

House Calendar No. 166

111TH CONGRESS }
2d Session }

HOUSE OF REPRESENTATIVES

{ REPORT
{ 111-422

IN THE MATTER OF THE INVESTIGATION INTO OFFI-
CIALLY CONNECTED TRAVEL OF HOUSE MEMBERS
TO ATTEND THE CARIB NEWS FOUNDATION MUL-
TINATIONAL BUSINESS CONFERENCES IN 2007 AND
2008

R E P O R T

OF THE

COMMITTEE ON STANDARDS OF
OFFICIAL CONDUCT

BOOK 1 OF 2



FEBRUARY 26, 2010.—Referred to the House Calendar and ordered to be
printed

**IN THE MATTER OF THE INVESTIGATION INTO OFFICIALLY CONNECTED TRAVEL OF
HOUSE MEMBERS TO ATTEND THE CARIB NEWS FOUNDATION MULTINATIONAL
BUSINESS CONFERENCES IN 2007 AND 2008—BOOK 1 OF 2**

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COMMITTEE ON STANDARDS OF OFFICIAL CONDUCT

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AMELIA JOHNSON, <i>Investigative Clerk</i>	

LETTER OF TRANSMITTAL

HOUSE OF REPRESENTATIVES,
COMMITTEE ON STANDARDS OF OFFICIAL CONDUCT,
Washington, DC, February 26, 2010.

Hon. LORRAINE C. MILLER,
Clerk, House of Representatives,
Washington, DC.

DEAR MS. MILLER: Pursuant to clauses 3(a)(2) and 3(b) of rule XI of the Rules of the House of Representatives, we herewith transmit the attached Report, "In the Matter of The Investigation Into Officially Connected Travel of House Members To Attend The Carib News Foundation Multinational Business Conferences in 2007 and 2008."

Sincerely,

ZOE LOFGREN,
Chair.
JO BONNER,
Ranking Republican
Member.

EXECUTIVE SUMMARY

The Investigative Subcommittee conducted a five-month review following a preliminary review by the Committee on Standards of Official Conduct (Standards Committee). The Investigative Subcommittee has concluded that Karl Rodney and Patricia Louis, agents of the Carib News Foundation (Foundation), provided false and misleading information to Members of Congress and the Standards Committee. They falsely indicated on the Private Sponsor Travel Certification Forms (sponsor form) provided to Members who attended the 2007 and 2008 Multi-National Business Conferences that the sole sponsor of those conferences was the Foundation.

At issue was corporate sponsorship of the 2007 and 2008 conferences. Several corporations, including AT&T, Verizon, and American Airlines, donated money to the Foundation specifically to sponsor the 2007 and/or 2008 conferences. Karl Rodney solicited the donations from the corporations on behalf of the Foundation. However, he told Representatives Thompson, Clarke, Payne, Kilpatrick, and Delegate Christensen, as well as staff of the Standards Committee, that the Foundation was the sole sponsor of the conference.

New travel rules were implemented in March of 2007. The new rules limit the corporations and entities that may sponsor travel for Members. Under the new rules, an entity that employs or retains lobbyists may only sponsor a Member's travel for one-day trips, provided the entity qualifies as a sponsor.

Before a Member may accept travel expenses from a private sponsor, the Member must receive approval from the Standards Committee. The Member is required to submit information about the trip, including the sponsor(s) of the trip, to the Standards Committee. The Standards Committee will not approve a trip for longer than one day if the trip is sponsored by an entity that employs or retains lobbyists. It will not approve a trip if an entity providing a source of funds does not qualify as a sponsor.

The new rules require the private sponsor to give information about the trip, including the location, the agenda, and the sponsors of the trip, to Members invited on that trip. It also requires the sponsor to certify certain information including that there are no other sources of funding for the travel. In turn, the invited Member submits the information provided by the private sponsor to the Standards Committee on a Private Sponsor Travel: Traveler Form (traveler form). The Member also submits a form to the Standards Committee that includes the sponsors of the trip and the estimated cost. The Member obtains this information from the trip sponsor.

Standards Committee staff reviews the information submitted by the Member. The Standards Committee staff attempts to verify the information provided by the trip sponsor. The Standards Com-

mittee will deny the Member's request for travel if a number of criteria, including the sponsors of the trip, do not meet the requirements of the new rule.

Patricia Louis, at the direction of Karl Rodney, contacted the Standards Committee in 2007 after the new rules were implemented and submitted the Private Sponsor Travel Certification Form and a trip agenda for Standards Committee staff to review. Standards Committee staff was concerned that the trip was sponsored by entities other than the Foundation. The staff repeatedly asked Patricia Louis, who in turn asked Karl Rodney, if any other entity provided money or in-kind donations to the Foundation for the 2007 conference.

Karl Rodney instructed Patricia Louis to tell the Standards Committee staff that the Foundation was the only sponsor of the trip. He also told her to tell the Standards Committee staff that corporations listed on the agenda donated to the Foundation's general fund.

After Karl Rodney and Patricia Louis told the Standards Committee staff on several occasions that the Foundation was the sole sponsor of the trip, the Standards Committee approved the Members' requests to attend the conference.

In 2008, the Foundation hosted another conference. The Foundation sent sponsor forms to Members to invite them to the conference. Some of the Members submitted the forms from the Foundation and traveler forms to the Standards Committee to review.

Standards Committee staff emailed and called Karl Rodney and Patricia Louis to ask about the conference. The staff asked if any other entity provided money or in-kind donations for the conference. Karl Rodney instructed Patricia Louis to tell the staff, "no."

After Karl Rodney and Patricia Louis told the Standards Committee staff on several occasions that the Foundation was the sole sponsor of the trip, the Standards Committee approved the Members' requests to attend the conference.

The Members relied upon the information the Foundation provided. The Standards Committee attempted to verify the information the Foundation provided. The Standards Committee did not find any evidence tending to show that the Foundation was not the sole sponsor of the conferences. The Standards Committee relied upon the information the Foundation provided.

The Investigative Subcommittee concluded that Karl Rodney and Patricia Louis provided false and misleading information to the Members by sending post-travel expense totals they knew to be false to the Members. Additionally, the Investigative Subcommittee concluded that Karl Rodney and Patricia Louis provided false testimony before the Investigative Subcommittee regarding the information they provided to the Members who attended the 2007 and 2008 conferences.

The Investigative Subcommittee found that Members who attended the conferences, other than Representative Charles Rangel, did not knowingly accept an improper gift of travel. These Members include Representatives Bennie Thompson, Yvette Clarke, Donald Payne, Carolyn Cheeks Kilpatrick, and Delegate Donna

Christensen. The Investigative Subcommittee found that Representative Rangel accepted an improper gift of travel.

The information provided to the Standards Committee by Karl Rodney and Patricia Louis, at Karl Rodney's direction, was false and misleading. Several corporations, including AT&T, Verizon, and American Airlines, donated to Carib News specifically for the conferences, after being solicited to contribute by Karl Rodney. Karl Rodney provided those entities with invoices specifying that the donations from those entities were for the conferences. The Government of Antigua and Barbuda (hereinafter Government of Antigua) also paid for lodging for Members of Congress, per an agreement with Karl Rodney.

The Investigative Subcommittee reviewed Representatives Bennie Thompson, Yvette Clarke, Donald Payne, Carolyn Cheeks Kilpatrick, and Delegate Donna Christensen's conduct under House Rule XXIII, clauses 1, 2, and 4, and House Rule XXV, clause 5.

The Investigative Subcommittee also reviewed Representative Charles Rangel's conduct under House Rule XXIII, clauses 1, 2, and 4, and House Rule XXV, clause 5. Representative Rangel's staff prepared a memorandum for him in 2008 that discussed a corporation's contribution to the 2008 conference. In 2006, Representative Rangel asked the Standards Committee whether he could ask corporations to donate money to the Foundation for the conference. The Standards Committee told him that it was not permissible.

The Investigative Subcommittee also reviewed the actions taken by Dawn Kelly Mobley, then designated counsel to the former Chair of the Standards Committee, related to the 2007 conference and determined that her communications with Patricia Louis were improper. Ms. Mobley provided internal Committee communications to Patricia Louis, which assisted Karl Rodney in formulating his answers to Committee counsel Susan Olson's questions regarding the conference sponsors. Ms. Mobley also gave contradictory information to Investigative Subcommittee counsel and the Investigative Subcommittee regarding her interaction with Carib News and other Committee Staff.

Therefore, the Investigative Subcommittee finds that Karl Rodney, through Patricia Louis, provided false information to the Standards Committee when Patricia Louis sent the sponsor form to the Committee for review in 2007 and again when they provided the sponsor form to Members for the 2008 conference, which was in turn submitted for review to the Committee. Furthermore, Karl Rodney directly and through Patricia Louis, provided false information in response to questions from Ms. Olson regarding the 2007 conference. Karl Rodney and Faye Rodney provided false or misleading information to Committee counsel Margaret Perl in response to questions regarding the 2008 conference. Additionally, Karl Rodney, through Patricia Louis, provided false information to Members of Congress to be used in the filing of their Post-Travel Disclosure Forms with the Office of the Clerk following the 2007 and 2008 conferences.

The Investigative Subcommittee also finds that Karl Rodney provided false or misleading testimony, while under oath, to the Investigative Subcommittee when he testified that the Government of Antigua did not pay for the lodging of the Members who attended

the 2007 conference and that the Government of Antigua was aware at the time that its payment was not being made for such lodging.

The Investigative Subcommittee finds that Dawn Kelly Mobley improperly communicated internal confidential Committee information to Karl Rodney and Patricia Louis. The Investigative Subcommittee further finds that Dawn Kelly Mobley improperly influenced the information provided by Karl Rodney and Patricia Louis to Ms. Olson during her review of the 2007 Multi-National Business Conference.

The Investigative Subcommittee makes no finding as to Representative Rangel's actual knowledge, but finds that his staff had knowledge that must be imputed to him. The knowledge involved the fact that private corporations, other than the Carib News Foundation, contributed funds directly to be used for the 2007 and 2008 Multi-National Business Conferences. Because of this knowledge, Representative Rangel was responsible for properly reporting to the Committee the correct classification of these corporations as co-sponsors for the 2007 and 2008 conferences. The Investigative Subcommittee does not conclude that Representative Rangel knowingly submitted false information to the Committee. However, it does find that Representative Rangel did not exercise proper supervision over his staff and office to ensure such information was properly reported.

The Investigative Subcommittee further found that the Standards Committee and the House would benefit from a review of the House travel rules and the Standards Committee's interpretation of those travel rules. While there is no doubt that the Foundation's conduct in the matter was illegal, and that Representative Rangel accepted a gift of travel he knew or should have known was improper, insufficient guidance by the Standards Committee staff during the Investigative Subcommittee's review suggests that a review of the rules and guidelines would be beneficial.

Because of the aforementioned information and findings, the Investigative Subcommittee makes the following recommendations.

1. The Investigative Subcommittee recommends that the Standards Committee refer the matters involving Karl Rodney, Faye Rodney and Patricia Louis, regarding their providing or conspiring to provide, false information to Congress, on multiple occasions, in violation of 18 U.S.C. § 1001 and 18 U.S.C. § 1505, to the U.S. Department of Justice for such action as the Department deems necessary.

2. The Investigative Subcommittee recommends that the Standards Committee authorize the release of materials in possession of the Committee and not available through any other source, to the U.S. Department of Justice, as necessary for any further action the Department of Justice pursues as a result of the referral of this matter.

3. As explained in this Report, the Investigative Subcommittee is concerned that violations of House rules and other standards of conduct may have occurred. The Investigative Subcommittee could pursue these matters only if its jurisdiction were expanded pursuant to Standards Committee rules and the resolution adopted by the Standards Committee on June 24, 2009. The Investigative Sub-

committee does not find sufficient evidence to conclude, nor does it believe that it would discover additional evidence to alter its conclusion, that Representative Rangel had actual knowledge of the memoranda written by his staff. However, the Investigative Subcommittee finds Representative Rangel is responsible for the knowledge maintained by his staff. For this reason, the Investigative Subcommittee does not recommend that its jurisdiction be expanded. Rather, the Investigative Subcommittee recommends the Standards Committee adopt this Report as the Report of the full Committee and approve its dissemination to the House and the public. It is the intention of this Investigative Subcommittee that the publication of this Report will serve as a public admonishment by the Standards Committee to Representative Rangel. The Investigative Subcommittee also intends the publication of this report will serve as an advisory for all Members, employees, and officials of the House that Members may be held responsible for the knowledge and official conduct of their staff. Furthermore, the Investigative Subcommittee recommends that the Standards Committee request Representative Rangel to repay the total cost of his trips to attend the 2007 and 2008 conferences.

4. As explained in this Report, the conduct of Dawn Kelly Mobley in this matter raises concerns that violations of House Rules and other standards of conduct may have occurred. The Investigative Subcommittee could pursue these matters only if its jurisdiction were expanded pursuant to Standards Committee rules and the resolution adopted by the full Standards Committee on June 24, 2009. However, the Investigative Subcommittee does not recommend that its jurisdiction be expanded. Rather, the Investigative Subcommittee recommends the Standards Committee adopt this Report as the Report of the full Committee and approve its dissemination to the House and the public. It is the intention of this Investigative Subcommittee that the publication of this Report will serve as a public admonishment by the Committee to Ms. Mobley.

5. Based on its investigation, the Investigative Subcommittee recommends that the Standards Committee establish written policies and procedures as to the duties and responsibilities of the designated counsels to the Chair and Ranking Member to ensure that such counsels are performing their duties to the Committee consistent with the provisions of Committee Rule 6. The interaction of the designated counsels in the travel review process or other Standards Committee functions performed by the professional staff can result, as the Subcommittee believes happened in this case, in improperly influencing the actions and recommendations of the staff.

6. During the course of its review, the Investigative Subcommittee encountered areas that could benefit from improvement in the current House rules and Standards Committee rules regarding travel. The Investigative Subcommittee recommends that the Standards Committee conduct a review of the current House travel rules and Standards Committee rules as necessary to ensure that information submitted by a sponsor accurately reflects the source of funding for Congressional travel and any other amendments that may be necessary to ensure an effective and efficient travel review process. For example, sponsors should be required to certify to the

accuracy of all information provided to invitees, including the post-travel cost information. Failure to provide certified post-travel information may result in that sponsor being ineligible to sponsor future trips. The travel regulations should also be amended to clarify the definition of a permissible source and to foster the identification and disclosure of such sources in connection with congressional travel.

7. During the course of the investigation, counsel for Karl Rodney was also engaged to represent Faye Rodney and Patricia Louis. The record indicates that information and questions asked during the Subcommittee interviews of one witness were disclosed to the other witnesses prior to their testimony or that counsel used the testimony of one witness to prepare the other witnesses for their testimony. Each witness was given a sequestration warning at the conclusion of his or her testimony. As addressed by the investigative subcommittee in *In the Matter of Representative Earl F. Hilliard*, multiple representation by one counsel is “inimical to the fact-finding process.”¹ Thus, the Investigative Subcommittee recommends that the Standards Committee adopt a rule prohibiting or limiting representation of multiple witnesses by counsel or counsels within the same firm.

8. The Investigative Subcommittee finds that Representative Bennie Thompson did not knowingly violate any provision of the House gift rule or other applicable rules of conduct when he accepted payment or reimbursement of travel to the 2007 and 2008 conferences. Additionally, the Investigative Subcommittee finds that Representative Bennie Thompson is entitled to rely upon the opinion letter issued by the Standards Committee approving his travel to the 2007 and the 2008 conferences. Therefore, Representative Thompson may not be sanctioned for unknowingly violating provisions of the House gift rule and other applicable rules or statutes. Nevertheless, the Investigative Subcommittee recommends that the Standards Committee request Representative Thompson to repay the costs of his trips to attend the 2007 and 2008 conferences as determined by the Standards Committee using its standard practices relating to the reimbursement of trips determined to be invalid. The Investigative Subcommittee further recommends that the Standards Committee dismiss the review of officially connected travel by Representative Thompson to the 2007 and 2008 conferences.

9. The Investigative Subcommittee finds that Delegate Donna Christensen did not knowingly violate any provision of the House gift rule or other applicable rules of conduct when she accepted payment or reimbursement of travel to the 2007 and 2008 conferences. Additionally, the Investigative Subcommittee finds that Delegate Christensen is entitled to rely upon the opinion letter issued by the Standards Committee approving her travel to the

¹ See House Comm. on Standards of Official Conduct, *In the Matter of Representative Earl F. Hilliard*, H. Rep. 107–130, 107th Cong., 1st Sess. 98 (July 10, 2001) (describing multirepresentation of witnesses as “inimical to the fact-finding process”); see also House Comm. on Standards of Official Conduct, *Investigation of Certain Allegations Related to Voting on the Medicare Prescription Drug, Improvement, and Modernization Act of 2003*, H. Rep. 108–722, 108th Cong., 2d Sess. 13–14 & n.16 (recommending a “sequestration of witnesses” requirement be implemented in future inquires by Committee rule, policy, or resolution and noting that multirepresentation of witnesses by the same attorney “poses a substantial risk to the integrity of an investigation”).

2007 and the 2008 conferences. Therefore, Delegate Christensen may not be sanctioned for unknowingly violating provisions of the House gift rule. Nevertheless, the Investigative Subcommittee recommends that the Standards Committee request Representative Christensen to repay the costs of her trips to attend the 2007 and 2008 conferences as determined by the Standards Committee using its standard practices relating to the reimbursement of trips determined to be invalid. The Investigative Subcommittee further recommends that the Standards Committee dismiss the review of officially connected travel by Delegate Christensen to the 2007 and 2008 conferences.

10. The Investigative Subcommittee finds that Representative Yvette Clarke did not knowingly violate any provision of the House gift rule or other applicable rules of conduct when she accepted payment or reimbursement of travel to the 2007 conference. Additionally, the Investigative Subcommittee finds that Representative Yvette Clarke is entitled to rely upon the opinion letter issued by the Standards Committee approving her travel to the 2007 conference. Therefore, Representative Clarke may not be sanctioned for unknowingly violating provisions of the House gift rule. Nevertheless, the Investigative Subcommittee recommends that the Standards Committee request Representative Clarke to repay the costs of her trip to attend the 2007 conference as determined by the Standards Committee using its standard practices relating to the reimbursement of trips determined to be invalid. The Investigative Subcommittee further recommends that the Standards Committee dismiss the review of officially connected travel by Representative Clarke to the 2007 conference.

11. The Investigative Subcommittee finds that Representative Donald Payne did not knowingly violate any provision of the House gift rule or other applicable rules of conduct when he accepted payment or reimbursement of travel to the 2008 conference. Additionally, the Investigative Subcommittee finds that Representative Donald Payne is entitled to rely upon the opinion letter issued by the Standards Committee approving his travel to the 2008 conference. Therefore, Representative Payne may not be sanctioned for unknowingly violating provisions of the House gift rule. Nevertheless, the Investigative Subcommittee recommends that the Standards Committee request Representative Payne to repay the costs of his trip to attend the 2008 conference as determined by the Standards Committee using its standard practices relating to the reimbursement of trips determined to be invalid. The Investigative Subcommittee further recommends that the Standards Committee dismiss the review of officially connected travel by Representative Payne to the 2008 conference.

12. The Investigative Subcommittee finds that Representative Carolyn Cheeks Kilpatrick did not knowingly violate any provision of the House gift rule or other applicable rules of conduct when she accepted payment or reimbursement of travel to the 2008 conference. Additionally, the Investigative Subcommittee finds that Representative Carolyn Cheeks Kilpatrick is entitled to rely upon the opinion letter issued by the Standards Committee approving her travel to the 2008 conference. Therefore, Representative Kilpatrick may not be sanctioned for unknowingly violating provisions

of the House gift rule. Nevertheless, the Investigative Subcommittee recommends that the Standards Committee request Representative Kilpatrick to repay the costs of her trip to attend the 2008 conference as determined by the Standards Committee using its standard practices relating to the reimbursement of trips determined to be invalid. The Investigative Subcommittee further recommends that the Standards Committee dismiss the review of officially connected travel by Representative Kilpatrick to the 2008 conference.

13. The Investigative Subcommittee recommends that the Standards Committee transmit this Report to the House and approve its dissemination to the public.

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COMMITTEE ON STANDARDS OF OFFICIAL CONDUCT

INVESTIGATION INTO OFFICIALLY CONNECTED TRAVEL
OF HOUSE MEMBERS TO ATTEND THE CARIB NEWS
FOUNDATION MULTINATIONAL BUSINESS CONFER-
ENCES IN 2007 AND 2008

FEBRUARY 26, 2010

Ms. LOFGREN, from the Committee on Standards of Official
Conduct, submitted the following

R E P O R T

I. INTRODUCTION

The Committee on Standards of Official Conduct (Standards Committee) submits this Report pursuant to House Rule XI, Clause 3(a)(2), which authorizes the Committee to investigate any alleged violation by a Member, officer, or employee of the House of Representatives of the Code of Official Conduct or any law, rule, regulation, or other standard of conduct applicable to the conduct of such Member, officer, or employee.

Pursuant to Rule 18, in 2009 the Committee, on its own initiative, began investigating officially-connected travel in 2007 and 2008 that was sponsored, funded, or organized by organizations known as Carib News or the Carib News Foundation. The travel involved in the investigation concerned the Carib News Foundation Multi-National Business Conferences, which were held in Antigua and Barbuda in November 2007 and St. Maarten in November 2008. During the course of the Committee's independent investigation, the Committee received referrals naming particular Members from the Office of Congressional Ethics (OCE) regarding this matter. On June 24, 2009, in accordance with clause 3 of House Rule XI and Committee Rules 14(a)(3) and 18, the Committee voted unanimously to establish an Investigative Subcommittee to conduct

an inquiry regarding allegations that have arisen regarding sponsorship of travel relating to six Members.

The Investigative Subcommittee conducted a thorough eight-month investigation. The Investigative Subcommittee authorized the issuance of six subpoenas; interviewed 29 witnesses; reviewed and analyzed over 3,000 pages of documents; and held over 19 Investigative Subcommittee meetings. The members of the Subcommittee voted unanimously to adopt the report which was presented to the Committee.

On February 25, 2010, the Standards Committee unanimously voted to adopt the Report of the Investigative Subcommittee and includes that Report herewith as part of the Standards Committee's Report to the House of Representatives on this matter. By this act, the Standards Committee adopts the findings, conclusions, and recommendations of the Investigative Subcommittee.

The Standards Committee unanimously voted to release a public Report finding that Representatives Bennie Thompson, Yvette Clarke, Donald Payne, Carolyn Cheeks Kilpatrick, and Delegate Donna Christensen did not knowingly violate any provision of the Code of Official Conduct or any law, rule, regulation, or other standard of conduct applicable to each individual's conduct in the performance of his or her duties or the discharge of his or her responsibilities with respect to the acceptance of payment or reimbursement for travel to either or both of the Carib News Foundation Multi-National Business Conferences held in 2007 and 2008. These Members properly relied on the information provided to them by the officers and employees of Carib News and the Carib News Foundation in seeking and receiving pre-trip approval from the Committee to accept these trips.

The Investigative Subcommittee found that these Members did not violate any House rule, regulation, law, or other standard of conduct. Only after the initiation of the Subcommittee's investigation was it learned that payments were made for their travel that were impermissible. Unfortunately, because false and misleading information was provided to the Committee, the Members inadvertently received impermissible gifts of travel that require repayment for the costs of their trips.

Although the Committee had approved the Members' travel, that approval was conditional upon the information provided to the Committee being true and correct. That was not the case. Since the Members were provided false information by others, and relied upon that information in seeking approval to accept the trips, the Committee concludes that the Members committed no wrongdoing. Nevertheless, since the Members did, in fact, receive impermissible gifts of travel, they must repay the costs of their trips to the respective entities that paid for their travel. Because some portions of transportation costs were paid by Carib News out of funds the actual source of which could not be determined, the Committee will require those funds to be paid to the U.S. Treasury.

The Report further finds that Representative Charles B. Rangel violated the House gift rule by accepting payment or reimbursement for travel to the 2007 and 2008 conferences. The evidence shows that members of Representative Rangel's staff knew that corporations had contributed funds to Carib News specifically for the 2007 and 2008 conferences. This information was not provided

to the Standards Committee when he sought and received approval from the Committee to accept these trips. The Committee does not find sufficient evidence to conclude, nor does it believe that it would discover additional evidence to alter its conclusion, that Representative Rangel had actual knowledge of the memoranda written by his staff. However, the report finds that Representative Rangel was responsible for the knowledge and actions of his staff in the performance of their official duties. It is the intention of the Committee that publication of this Report will serve as a public admonishment by the Standards Committee of Representative Rangel. The Committee will also require Representative Rangel to repay the costs of the trips to the respective entities that paid for his travel. Because some portions of his transportation costs were paid by Carib News out of funds the actual source of which could not be determined, the Committee will require those funds to be paid to the U.S. Treasury.

The Report further finds that Dawn Kelly Mobley, former shared staff to the Committee who was designated counsel to the former Chair of the Standards Committee, improperly communicated confidential internal Committee information to officers and employees of Carib News, Karl Rodney and Patricia Louis, and that she improperly influenced the information provided by Karl Rodney and Patricia Louis to Standards Committee staff during the Committee's review of the 2007 Multi-National Business Conference. It is the intention of the Committee that publication of this Report will serve as a public admonishment by the Standards Committee of Ms. Mobley.

Finally, the Report finds that officers and employees of Carib News and the Carib News Foundation—Karl Rodney, Faye Rodney, and Patricia Louis—submitted false or misleading information to the Committee during its pre-travel review of the 2007 and 2008 conferences and again when providing sworn testimony to the Investigative Subcommittee. The Committee unanimously voted to refer the conduct of these officers and employees of Carib News and the Carib News Foundation to the United States Department of Justice for further action as it deems appropriate.

In accordance with clauses 3(a)(2) and 3(b) of House Rule XI, and Standards Committee Rule 10(a)(7), the Standards Committee unanimously agreed to issue the attached Report to the House. The Report follows the receipt of materials forwarded to the Standards Committee by the Office of Congressional Ethics (OCE) and addresses the findings and conclusions of the Standards Committee with regard to the conduct of Representatives Thompson, Payne, Kilpatrick, Clarke, Rangel, and Delegate Christensen. OCE's Report and Findings for each member are contained within the Standards Committee's Report.

The Standards Committee thanks the members of the Investigative Subcommittee for their hard work, dedication, and service to the Committee and to the House. Representative G.K. Butterfield served as Chair of the Investigative Subcommittee. Representative Charles W. Dent served as Ranking Republican Member. Representatives Brad Miller and Michael K. Simpson also served on the Subcommittee. In addition, Representative J. Gresham Barrett initially served as Ranking Republican Member before resigning his position on the Standards Committee, at which time Represent-

ative Dent was selected as Ranking Republican Member. Each of these members devoted substantial time and effort to the investigation, and the Committee thanks each of them for their service.

II. STATEMENT UNDER RULE 13, CLAUSE 39(c) OF THE RULES OF THE HOUSE OF REPRESENTATIVES

The Standards Committee made no special oversight findings in this report. No budget statement is submitted. No funding is authorized by any measure in this report.

I. INTRODUCTION

A. ESTABLISHMENT OF THE INVESTIGATIVE SUBCOMMITTEE

On June 24, 2009, the Standards Committee passed a Resolution by unanimous vote establishing an Investigative Subcommittee in response to an ongoing Standards Committee investigation into officially connected travel by Members of the House of Representatives and referrals from the Office of Congressional Ethics.² The travel involved in the investigation as authorized by the Resolution concerned two conferences hosted by the Carib News Foundation, Inc. (the Foundation), which were held in Antigua in November 2007, and St. Maarten in November 2008. While the Foundation has sponsored similar conferences since 1995, only the conferences held in 2007 and 2008 were included within the jurisdiction of the Investigative Subcommittee under the Resolution, because they were held after the House travel rules were amended and became effective in March 2007. The amended travel rules required that all Members, staff, and employees receive pre-travel approval from the Standards Committee before accepting any officially connected travel from a private sponsor.

In a public statement released on June 25, 2009, Representative Zoe Lofgren, Standards Committee Chair, and Representative Jo Bonner, Ranking Republican Member, announced the establishment of the Investigative Subcommittee. The announcement stated that Representative G. K. Butterfield would serve as the Chairman of the Investigative Subcommittee and Representative J. Gresham Barrett as the Ranking Republican Member.³ Representatives Brad Miller and Michael K. Simpson would serve on the Subcommittee as Members.

On July 9, 2009, the Investigative Subcommittee held its first meeting. During the initial meeting, the Subcommittee authorized Standards Committee counsel assigned to the Subcommittee to interview Standards Committee staff involved in the pre-travel reviews for the 2007 and 2008 conferences. The Investigative Subcommittee also authorized the issuance of a subpoena to the Foundation for all records, communications, documents and other materials related to the 2007 and 2008 conferences. The Investigative Subcommittee further authorized counsel to contact Members' offices and verify which Members attended the 2007 and 2008 conferences. During a subsequent meeting on July 30, 2009, the Subcommittee authorized counsel to begin interviewing Members' staff,

²See Exhibit 1.

³Representative Barrett, following his resignation from the Standards Committee, was subsequently replaced as Ranking Republican Member of the Subcommittee by Representative Charles W. Dent.

notify involved Members of the investigation, and request documents and records maintained by the Members and their staff related to the two conferences.

B. INVESTIGATIVE PROCESS

The Investigative Subcommittee authorized counsel to interview Standards Committee staff that had reviewed or had knowledge of the 2007 and 2008 conference travel requests. Because of their involvement and the sequestration rule in the Resolution, counsel and staff who had worked on or discussed the two conferences were recused from any work on the investigation and discussions regarding the investigation. Counsel who had been hired after the 2008 conference were assigned to the investigation.

Pursuant to Standards Committee Rule 19(b)(5), the Subcommittee authorized—and the Standards Committee’s Chair and Ranking Member subsequently issued—a subpoena to Karl Rodney, who agreed to accept service on behalf of the Foundation and Carib News, for all records related or pertaining to the 2007 and 2008 Multi-National Business conferences sponsored or funded by the Carib News Foundation. The initial returns of documents required under the subpoena did not contain any transaction records, such as the records of contributions from corporations to the Foundation for the conferences, hotel receipts and bills, or transportation records. Upon discussion with counsel to the Foundation, some of these records were subsequently provided. When questioned as to the records provided pursuant to the subpoena, Mr. Rodney indicated he had other records that he had not provided.⁴ The Subcommittee asked Mr. Rodney to provide those records.⁵ His attorney later notified Subcommittee counsel that the records described by Mr. Rodney during his interview did not exist.

Pursuant to Standards Committee Rule 19(b)(5), the Subcommittee authorized the issuance of a subpoena to Unique Vacations, Inc., the U.S. representative for Sandals Grande Antigua Resort and Spa, site of the 2007 conference. Unique Vacations provided records, including the contract between Unique Vacations, Inc. and the Carib News Foundation, signed on May 5, 2007, by Faye Rodney, which indicated the agreement for the costs for lodging, meals, and conference facilities to be used for the 2007 Conference.⁶ The materials provided by Unique Vacations, Inc., pursuant to the subpoena, also included a memorandum from Karl Rodney to Dr. Errol Cort, Minister of Finance, for the Government of Antigua referencing an agreement that Antigua would pay for the lodging and meals for Members of Congress and other VIPs.⁷

Investigative Subcommittee counsel contacted the Sonesta Maho Beach Resort in St. Maarten, the site of the 2008 conference, and requested they provide any records in their possession related to the 2008 conference including lodging bills for the Members who

⁴Karl Rodney October 28, 2009, Tr. at 22. *See also* Karl Rodney December 1, 2009, Tr. at 145–146.

⁵Karl Rodney December 1, 2009, Tr. at 146.

⁶*See* Exhibit 2.

⁷*See* Exhibit 3.

attended the 2008 conference. The Sonesta Maho has not provided any requested records.⁸

The Investigative Subcommittee authorized a subpoena to Citibank Corporation for bank records for accounts owned by Carib News, Inc. (Carib News), the Carib News Foundation, Karl Rodney, and Faye Rodney. The subpoena was issued by the Standards Committee and served on Citibank on November 5, 2009. Citibank provided the records requested pursuant to the subpoena in late November and early December 2009. The records indicated that Carib News has multiple accounts with Citibank and frequently transfers money among the varying accounts. A review of these records indicated that the corporate contributions received for the 2007 and 2008 conferences were deposited in different accounts and comingled with other funds received by News.

Standards Committee counsel conducted staff interviews of current and former Standards Committee staff that were involved or had knowledge of the pre-travel reviews and approvals for the 2007 and 2008 conferences.⁹ Standards Committee counsel also interviewed current and former staff of Representatives Charles Rangel, Bennie Thompson, Yvette Clarke, Carolyn Kilpatrick, Donald Payne, and Delegate Donna Christensen, who had knowledge of the conferences and documents submitted to the Standards Committee for approval.

The Investigative Subcommittee interviewed Delegate Christensen and Representatives Rangel, Thompson, Kilpatrick, Clarke, Payne, as well as Sheila Jackson Lee, who attended one day of the 2008 conference at her own expense. The Investigative Subcommittee also took sworn testimony from Karl Rodney, Faye Rodney, Patricia Louis, and Dawn Kelly Mobley.

1. Carib News, Inc. and the Carib News Foundation

While there is little public information about the Carib News Foundation other than its affiliation with Carib News, Inc., attorneys for the Carib News Foundation, Carib News, Inc., and Karl Rodney provided some background information in a letter sent to Leo Wise, Staff Director and Chief Counsel, Office of Congressional Ethics (OCE).¹⁰ As explained in the letter, Mr. Rodney is a native of Jamaica and has been active in the Caribbean American community for many years. Mr. Rodney had been employed for 15 years with a life insurance company when, in 1982, he recognized the need for a media outlet for the Caribbean-American community. At that time, Mr. Rodney and his wife, Faye, founded Carib News using personal funds. Carib News is a weekly publication located in New York City that provides news and other information for the Caribbean-American community residing primarily in New York. According to records on file with the New York State Division of Corporations, Carib News, Inc. was incorporated on June 8, 1982, in Westchester County, New York, as a domestic business corpora-

⁸The Sonesta Maho Beach Resort does not have a legal presence in the United States on whom a congressional subpoena could be served. Any cooperation from the Sonesta Maho would be voluntary.

⁹Committee counsel had interviewed some Members' staff before the Investigative Subcommittee was empanelled during its Rule 18(a) inquiry. Transcripts of those interviews were also reviewed by counsel assigned to the Investigative Subcommittee.

¹⁰See Exhibit 4.

tion.¹¹ Karl Rodney is listed as the corporation's Chairman and Chief Executive Officer.

According to records on file with the New York State Division of Corporations, the Carib News Foundation was incorporated on May 27, 1988, as Carib News Charities, Inc., and is identified as a domestic, not-for-profit corporation. On May 15, 2001, the corporate name for Carib News Charities was changed to Carib News Foundation. Karl Rodney is listed as the process agent for the corporation.¹² There is no listing regarding officers or directors of the corporation. However, during interviews with Karl and Faye Rodney, each indicated they were both directors of the Foundation and their daughter, Michele Rodney, is the President.¹³ Michele Rodney is an attorney licensed to practice in the New York metropolitan area. Her office is located at the same address as the Carib News Foundation and Carib News, Inc.¹⁴

According to the letter and additional information provided by Karl and Faye Rodney, the goal of the Foundation is to support the community outreach program of Carib News, Inc. The Foundation receives "modest annual contributions" unrelated to the annual conference for other activities.¹⁵ According to the letter from his attorneys, Mr. Rodney and the Foundation have "welcomed the financial support and meaningful participation of corporations interested in marketing their services to the Caribbean-American community" in promoting the annual conference.¹⁶

2. The Multi-National Business Conferences

According to the conference's "mission statement," the Multi-National Business Conferences organized by Carib News have been held annually since 1995 for the following purpose:

To bring together businesses, community, and governmental leaders interested in understanding the economic opportunities in the Caribbean marketplace, locally and in the Caribbean.

To make a global community among Diverse Business Entities and the Caribbean.

Linkage between the emerging markets of the U.S. and the Developing Economics [sic] of the Caribbean.¹⁷

According to the information provided on the conference's Web site,¹⁸ the agendas¹⁹ presented to the Standards Committee during the pre-travel approval process, and testimony from witnesses who attended the conferences,²⁰ the conferences consisted of three days of meetings and workshops where information about education,

¹¹ See Exhibit 5.

¹² See Exhibit 6.

¹³ Investigative Subcommittee interviews of Karl Rodney on October 28, 2009; Faye Rodney on October 27, 2009; and Patricia Louis on November 18, 2009.

¹⁴ New York State Unified Court System, Attorney Directory, Attorney Detail—Michele Rodney, <https://iapps.courts.state.ny.us/attorney/AttorneyDetails?attorneyId=5468239> (last visited November 12, 2009).

¹⁵ See Exhibit 4.

¹⁶ *Id.*

¹⁷ Caribbean Multinational Business Conference, About the Conference, <http://www.caribnewsconference.com/abouttheconference.html> (last accessed on November 4, 2009).

¹⁸ See Exhibit 7.

¹⁹ See Exhibit 8.

²⁰ Subcommittee interviews of Representatives Rangel, Thompson, Clarke, Kilpatrick, Payne and Delegate Christensen.

health, security, and business opportunities, among other topics, were discussed and explored. Each Member who attended the conferences had specific roles, such as speaking before groups or participating in round table discussions, based on their interests and congressional assignments.²¹ Witnesses indicated that the value of meeting with leaders of Caribbean nations and discussing topics of interest to both the Caribbean nations and the United States could not be overestimated.²² Representative Thompson added that the Caribbean held a special interest because the area was part of the “President’s Third Border Initiative” to help strengthen security in this region.²³

II. FEDERAL LAWS AND HOUSE RULES

A. RELEVANT PROVISIONS OF TITLE 18 U.S.C. § 1001—STATEMENTS OR ENTRIES GENERALLY

(a) Except as otherwise provided in this section, whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully—

(1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact;

(2) makes any materially false, fictitious, or fraudulent statement or representation; or

(3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry;

shall be fined under this title, imprisoned not more than 5 years or, if the offense involves international or domestic terrorism (as defined in section 2331), imprisoned not more than 8 years, or both. If the matter relates to an offense under chapter 109A, 109B, 110, or 117, or section 1591, then the term of imprisonment imposed under this section shall be not more than 8 years.

(b) Subsection (a) does not apply to a party to a judicial proceeding, or that party’s counsel, for statements, representations, writings or documents submitted by such party or counsel to a judge or magistrate in that proceeding.

(c) With respect to any matter within the jurisdiction of the legislative branch, subsection (a) shall apply only to—

(1) administrative matters, including a claim for payment, a matter related to the procurement of property or services, personnel or employment practices, or support services, or a document required by law, rule, or regulation to be submitted to the Congress or any office or officer within the legislative branch; or

(2) any investigation or review, conducted pursuant to the authority of any committee, subcommittee, commission or office

²¹ *Id.*

²² *Id.*

²³ “The Caribbean nations, our often overlooked ‘third border,’ are important partners on trade, health and education issues and regional democracy. Illegal drug trafficking, migrant smuggling and financial crime, however, threaten both United States and regional security interests. In order to better focus the U.S.-Caribbean relationship and work with our partners on a number of capacity building tasks, the Bush Administration has developed a ‘Third Border Initiative.’” White House Fact Sheet on the Caribbean Border Initiative, April 21, 2001, <http://georgewbush-whitehouse.archives.gov/news/releases/2001/04/20010423-5.html> (last visited February 23, 2010).

of the Congress, consistent with applicable rules of the House or Senate.

B. TITLE 18 U.S.C. § 1341—FRAUDS AND SWINDLES

Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, or to sell, dispose of, loan, exchange, alter, give away, distribute, supply, or furnish or procure for unlawful use any counterfeit or spurious coin, obligation, security, or other article, or anything represented to be or intimated or held out to be such counterfeit or spurious article, for the purpose of executing such scheme or artifice or attempting so to do, places in any post office or authorized depository for mail matter, any matter or thing whatever to be sent or delivered by the Postal Service, or deposits or causes to be deposited any matter or thing whatever to be sent or delivered by any private or commercial interstate carrier, or takes or receives therefrom, any such matter or thing, or knowingly causes to be delivered by mail or such carrier according to the direction thereon, or at the place at which it is directed to be delivered by the person to whom it is addressed, any such matter or thing, shall be fined under this title or imprisoned not more than 20 years, or both. If the violation occurs in relation to, or involving any benefit authorized, transported, transmitted, transferred, disbursed, or paid in connection with, a presidentially declared major disaster or emergency (as those terms are defined in section 102 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. § 5122)), or affects a financial institution, such person shall be fined not more than \$1,000,000 or imprisoned not more than 30 years, or both.

C. TITLE 18 U.S.C. § 1343—FRAUD BY WIRE, RADIO OR TELEVISION

Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice, shall be fined under this title or imprisoned not more than 20 years, or both. If the violation occurs in relation to, or involving any benefit authorized, transported, transmitted, transferred, disbursed, or paid in connection with, a presidentially declared major disaster or emergency (as those terms are defined in section 102 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. § 5122)), or affects a financial institution, such person shall be fined not more than \$1,000,000 or imprisoned not more than 30 years, or both.

D. 18 U.S.C. § 1621—PERJURY GENERALLY

Whoever—

(1) having taken an oath before a competent tribunal, officer, or person, in any case in which a law of the United States authorizes an oath to be administered, that he will testify, declare, depose, or certify truly, or that any written testimony,

declaration, deposition, or certificate by him subscribed, is true, willfully and contrary to such oath states or subscribes any material matter which he does not believe to be true; or

(2) in any declaration, certificate, verification, or statement under penalty of perjury as permitted under section 1746 of title 28, United States Code, willfully subscribes as true any material matter which he does not believe to be true;

is guilty of perjury and shall, except as otherwise expressly provided by law, be fined under this title or imprisoned not more than five years, or both. This section is applicable whether the statement or subscription is made within or without the United States.

E. RELEVANT PROVISIONS OF TITLE 5 U.S.C. § 7342, RECEIPT AND DISPOSITION OF FOREIGN GIFTS AND DECORATIONS (FGDA)

(b) An employee may not—

(1) request or otherwise encourage the tender of a gift or decoration; or

(2) accept a gift or decoration, other than in accordance with the provisions of subsections (c) and (d).

(c)

(1) The Congress consents to—

(A) the accepting and retaining by an employee of a gift of minimal value tendered and received as a souvenir or mark of courtesy; and

(B) the accepting by an employee of a gift of more than minimal value when such gift is in the nature of an educational scholarship or medical treatment or when it appears that to refuse the gift would likely cause offense or embarrassment or otherwise adversely affect the foreign relations of the United States, except that

(i) a tangible gift of more than minimal value is deemed to have been accepted on behalf of the United States and, upon acceptance, shall become the property of the United States; and

(ii) an employee may accept gifts of travel or expenses for travel taking place entirely outside the United States (such as transportation, food, and lodging) of more than minimal value if such acceptance is appropriate, consistent with the interests of the United States, and permitted by the employing agency and any regulations which may be prescribed by the employing agency.

(2) Within 60 days after accepting a tangible gift of more than minimal value (other than a gift described in paragraph

(1)(B)(ii)), an employee shall—

(A) deposit the gift for disposal with his or her employing agency; or

(B) subject to the approval of the employing agency, deposit the gift with that agency for official use.

Within 30 days after terminating the official use of a gift under subparagraph (B), the employing agency shall forward the gift to the Administrator of General Services in accordance with subsection (e)(1) or provide for its disposal in accordance with subsection (e)(2).

(3) When an employee deposits a gift of more than minimal value for disposal or for official use pursuant to paragraph (2), or within 30 days after accepting travel or travel expenses as provided in paragraph (1)(B)(ii) unless such travel or travel expenses are accepted in accordance with specific instructions of his or her employing agency, the employee shall file a statement with his or her employing agency or its delegate containing the information prescribed in subsection (f) for that gift.

(d) The Congress consents to the accepting, retaining, and wearing by an employee of a decoration tendered in recognition of active field service in time of combat operations or awarded for other outstanding or unusually meritorious performance, subject to the approval of the employing agency of such employee. Without this approval, the decoration is deemed to have been accepted on behalf of the United States, shall become the property of the United States, and shall be deposited by the employee, within sixty days of acceptance, with the employing agency for official use, for forwarding to the Administrator of General Services for disposal in accordance with subsection (e)(1), or for disposal in accordance with subsection (e)(2).

* * *

(h) The Attorney General may bring a civil action in any district court of the United States against any employee who knowingly solicits or accepts a gift from a foreign government not consented to by this section or who fails to deposit or report such gift as required by this section. The court in which such action is brought may assess a penalty against such employee in any amount not to exceed the retail value of the gift improperly solicited or received plus \$5,000.

F. RELEVANT PROVISIONS OF TITLE 26 U.S.C. § 4941 AND 26 U.S.C § 4946

1. Title 26 U.S.C. 4941—Private Foundations: Taxes on Self-Dealing

(a) Initial taxes.

(1) On self-dealer. There is hereby imposed a tax on each act of self-dealing between a disqualified person and a private foundation. The rate of tax shall be equal to 10 percent of the amount involved with respect to the act of self-dealing for each year (or part thereof) in the taxable period. The tax imposed by this paragraph shall be paid by any disqualified person (other than a foundation manager acting only as such) who participates in the act of self-dealing. In the case of a government official (as defined in section 4946(c) [26 U.S.C. § 4946(c)]), a tax shall be imposed by this paragraph only if such disqualified person participates in the act of self-dealing knowing that it is such an act.

(2) On foundation manager. In any case in which a tax is imposed by paragraph (1), there is hereby imposed on the participation of any foundation manager in an act of self-dealing between a disqualified person and a private foundation, knowing that it is such an act, a tax equal to 5 percent of the amount involved with respect to the act of self-dealing for each year (or part thereof) in the taxable period, unless such participation is

not willful and is due to reasonable cause. The tax imposed by this paragraph shall be paid by any foundation manager who participated in the act of self-dealing.

(b) Additional taxes.

(1) On self-dealer. In any case in which an initial tax is imposed by subsection (a)(1) on an act of self-dealing by a disqualified person with a private foundation and the act is not corrected within the taxable period, there is hereby imposed a tax equal to 200 percent of the amount involved. The tax imposed by this paragraph shall be paid by any disqualified person (other than a foundation manager acting only as such) who participated in the act of self-dealing.

(2) On foundation manager. In any case in which an additional tax is imposed by paragraph (1), if a foundation manager refused to agree to part or all of the correction, there is hereby imposed a tax equal to 50 percent of the amount involved. The tax imposed by this paragraph shall be paid by any foundation manager who refused to agree to part or all of the correction.

(c) Special rules.

For purposes of subsections (a) and (b)—

(1) Joint and several liability. If more than one person is liable under any paragraph of subsection (a) or (b) with respect to any one act of self-dealing, all such persons shall be jointly and severally liable under such paragraph with respect to such act.

(2) \$20,000 limit for management. With respect to any one act of self-dealing, the maximum amount of the tax imposed by subsection (a)(2) shall not exceed \$20,000, and the maximum amount of the tax imposed by subsection (b)(2) shall not exceed \$20,000.

(d) Self-dealing.

(1) In general. For purposes of this section, the term “self-dealing” means any direct or indirect—

(A) sale or exchange, or leasing, of property between a private foundation and a disqualified person;

(B) lending of money or other extension of credit between a private foundation and a disqualified person;

(C) furnishing of goods, services, or facilities between a private foundation and a disqualified person;

(D) payment of compensation (or payment or reimbursement of expenses) by a private foundation to a disqualified person;

(E) transfer to, or use by or for the benefit of, a disqualified person of the income or assets of a private foundation; and

(F) agreement by a private foundation to make any payment of money or other property to a government official (as defined in section 4946(c) [26 U.S.C. § 4946(c)]), other than an agreement to employ such individual for any period after the termination of his government service if such individual is terminating his government service within a 90-day period.

2. Title 26 U.S.C. § 4946—Definitions and special rules

(a) Disqualified person.

(1) In general. For purposes of this subchapter [26 U.S.C. §§ 4940 et seq.], the term “disqualified person” means, with respect to a private foundation, a person who is—

(A) a substantial contributor to the foundation,
 (B) a foundation manager (within the meaning of subsection (b)(1)),

(C) an owner of more than 20 percent of—
 (i) the total combined voting power of a corporation,
 (ii) the profits interest of a partnership, or
 (iii) the beneficial interest of a trust or unincorporated enterprise, which is a substantial contributor to the foundation,

(D) a member of the family (as defined in subsection (d)) of any individual described in subparagraph (A), (B), or (C),

(E) a corporation of which persons described in subparagraph (A), (B), (C), or (D) own more than 35 percent of the total combined voting power,

(F) a partnership in which persons described in subparagraph (A), (B), (C), or (D) own more than 35 percent of the profits interest,

(G) a trust or estate in which persons described in subparagraph (A), (B), (C), or (D) hold more than 35 percent of the beneficial interest,

(H) only for purposes of section 4943 [26 U.S.C. § 4943], a private foundation—

(i) which is effectively controlled (directly or indirectly) by the same person or persons who control the private foundation in question, or

(ii) substantially all of the contributions to which were made (directly or indirectly) by the same person or persons described in subparagraph (A), (B), or (C), or members of their families (within the meaning of subsection (d)), who made (directly or indirectly) substantially all of the contributions to the private foundation in question, and

(I) only for purposes of section 4941 [26 U.S.C. § 4941], a government official (as defined in subsection (c)).

(2) Substantial contributors. For purposes of paragraph (1), the term “substantial contributor” means a person who is described in section 507(d)(2) [26 U.S.C. § 507(d)(2)].

(3) Stockholdings. For purposes of paragraphs (1)(C)(i) and (1)(E), there shall be taken into account indirect stockholdings which would be taken into account under section 267(c) [26 U.S.C. § 267(c)], except that, for purposes of this paragraph, section 267(c)(4) [26 U.S.C. § 267(c)(4)] shall be treated as providing that the members of the family of an individual are the members within the meaning of subsection (d).

(4) Partnerships; trusts. For purposes of paragraphs (1)(C)(ii) and (iii), (1)(F), and (1)(G), the ownership of profits or beneficial interests shall be determined in accordance with the rules for constructive ownership of stock provided in section 267(c) [26 U.S.C. § 267(c)] (other than paragraph (3) thereof), except that section 267(c)(4) [26 U.S.C. § 267(c)(4)] shall be

treated as providing that the members of the family of an individual are the members within the meaning of subsection (d).

(b) Foundation manager. For purposes of this subchapter [26 U.S.C. § 4940 et seq.], the term “foundation manager” means, with respect to any private foundation—

(1) an officer, director, or trustee of a foundation (or an individual having powers or responsibilities similar to those of officers, directors, or trustees of the foundation), and

(2) with respect to any act (or failure to act), the employees of the foundation having authority or responsibility with respect to such act (or failure to act).

(c) Government official. For purposes of subsection (a)(1)(I) and section 4941 [26 U.S.C. § 4941], the term “government official” means, with respect to an act of self-dealing described in section 4941 [26 U.S.C. § 4941], an individual who, at the time of such act, holds any of the following offices or positions (other than as a “special Government employee”, as defined in section 202(a) of title 18, United States Code):

(1) an elective public office in the executive or legislative branch of the Government of the United States,

(2) an office in the executive or judicial branch of the Government of the United States, appointment to which was made by the President,

(3) a position in the executive, legislative, or judicial branch of the Government of the United States—

(A) which is listed in schedule C of rule VI of the Civil Service Rules, or

(B) the compensation for which is equal to or greater than the lowest rate of basic pay for the Senior Executive Service under section 5382 of title 5, United States Code,

(4) a position under the House of Representatives or the Senate of the United States held by an individual receiving gross compensation at an annual rate of \$15,000 or more,

(5) an elective or appointive public office in the executive, legislative, or judicial branch of the government of a State, possession of the United States, or political subdivision or other area of any of the foregoing, or of the District of Columbia, held by an individual receiving gross compensation at an annual rate of \$20,000 or more,

(6) a position as personal or executive assistant or secretary to any of the foregoing, or,

(7) a Member of the Internal Revenue Service Oversight Board.

(d) Members of family. For purposes of subsection (a)(1), the family of any individual shall include only his spouse, ancestors, children, grandchildren, great grandchildren, and the spouses of children, grandchildren, and great grandchildren.

G. RELEVANT PROVISIONS OF HOUSE RULE XXIII—CODE OF OFFICIAL CONDUCT

Clause 1. A Member, Delegate, Resident Commissioner, officer, or employee of the House shall behave at all times in a manner that shall reflect creditably on the House.

Clause 2. A Member, Delegate, Resident Commissioner, officer, or employee of the House shall adhere to the spirit and the letter

of the Rules of the House and to the rules of duly constituted committees thereof.

Clause 4. A Member, Delegate, Resident Commissioner, officer, or employee of the House may not accept gifts except as provided by clause 5 of Rule XXV.

H. RELEVANT PROVISIONS OF HOUSE RULE XXV—LIMITATION ON OUTSIDE EARNED INCOME AND ACCEPTANCE OF GIFTS

Clause 5(a)(1)(A)(i). A Member, Delegate, Resident Commissioner, officer or employee of the House may not knowingly accept a gift except as provided in this clause.

Clause 5(a)(1)(A)(ii). A Member, Delegate, Resident Commissioner, officer, or employee of the House may not knowingly accept a gift from a registered lobbyist or agent of a foreign principal or from a private entity that retains or employs registered lobbyists or agents of a foreign principal except as provided in subparagraph (3) of this paragraph.

Clause 5(a)(2)(A). In this clause the term “gift” means gratuity, favor, discount, entertainment, hospitality, loan, forbearance, or other item having monetary value. The term includes gifts of services, training, transportation, lodging, and meals, whether provided in kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.

Clause 5(b)(1)(A). A reimbursement (including payment in kind) to a Member, Delegate, Resident Commissioner, officer, or employee of the House for necessary transportation, lodging, and related expenses for travel to a meeting, speaking engagement, fact-finding trip, or similar event in connection with the duties of such individual as an office-holder shall be considered as a reimbursement to the House and not a gift prohibited by this clause when it is from a private source other than a registered lobbyist or agent of a foreign principal or a private entity that retains or employs registered lobbyists or agents of a foreign principal (except as provided in subdivision (C)), if the Member, Delegate, Resident Commissioner, officer or employee—(ii) discloses the expenses reimbursed or to be reimbursed . . . to the Clerk within 15 days after the travel is completed.

Clause 5(b)(1)(C). A reimbursement (including payment in kind) to a Member, delegate, resident Commissioner, officer, or employee of the House for any purpose described in subdivision (A) also shall be considered as a reimbursement to the House and not a gift prohibited by this clause (without regard to whether the source retains or employs registered lobbyists or agents of a foreign principal) if it is, under regulations prescribed by the Committee on Standards of Official Conduct to implement this provision—

(i) directly from an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965; or

(ii) provided only for attendance at or participation in a one-day event (exclusive of travel time and an overnight stay).

Clause 5(b)(3). Each disclosure made under subparagraph (1)(A) shall be signed by the Member, Delegate, Resident Commissioner, or officer (in the case of travel by that Member, Delegate, Resident Commissioners, or officer) or by the Member, Delegate, Resident

Commissioner, or officer under whose direct supervision the employee works (in the case of travel by an employee) and shall include—

(A) a good faith estimate of total transportation expenses reimbursed or to be reimbursed;

(B) a good faith estimate of total lodging expenses reimbursed or to be reimbursed;

(C) a good faith estimate of total meal expenses reimbursed or to be reimbursed;

(D) a good faith estimate of the total of other expenses reimbursed or to be reimbursed;

(E) a determination that all such expenses are necessary transportation, lodging, and related expenses as defined in subparagraph (4);

(F) a description of the meetings and events attended; and

(G) in the case of a reimbursement to a Member, delegate, resident Commissioner, or officer, a determination that the travel was in conjunction with the duties of such individual as an officeholder and would not create the appearance that the Member, Delegate, resident Commissioner, or officer is using public office for private gain.

Clause 5(b)(4). In this paragraph the term “necessary transportation, lodging, and related expenses”—

(A) includes reasonable expenses that are necessary for travel for a period not exceeding four days within the United States or seven days exclusive of travel time outside of the United States unless approved in advance by the Committee on Standards of Official Conduct;

(B) is limited to reasonable expenditures for transportation, lodging, conference fees and materials, and food and refreshments, including reimbursement for necessary transportation, whether or not such transportation occurs within the periods described in subdivision (A);

(C) does not include expenditures for recreational activities, nor does it include entertainment other than that provided to all attendees as an integral part of the event, except for activities or entertainment otherwise permissible under this clause; and

(D) may include travel expenses incurred on behalf of a relative of the Member, Delegate, Resident Commissioner, officer or employee.

Clause 5(c)(2). A Member, delegate, Resident Commissioner, officer, or employee of the House may not accept a reimbursement (including payment in kind) for transportation, lodging, or related expenses under the exception in paragraph (b)(1)(C)(ii) of this clause for a trip that is financed in whole or in part by a private entity that retains or employs registered lobbyists or agents of a foreign principal unless any involvement of a registered lobbyist or agent of a foreign principal in the planning, organization, request, or arrangement of the trip is de minimis under rules prescribed by the Committee on Standards of Official Conduct to implement paragraph (b)(1)(C) of this clause.

Clause 5(d). A Member, Delegate, Resident Commissioner, officer, or employee of the House shall, before accepting travel other-

wise permissible under paragraph (b)(1) of this clause from any private source—

(1) provide to the Committee on Standards of Official Conduct before such trip a written certification signed by the source or (in the case of a corporate person) by an officer of the source—

(A) that the trip will not be financed in any part by a registered lobbyist or agent of a foreign principal;

(B) that the source either—

(i) does not retain or employ registered lobbyists or agents of a foreign principal; or

(ii) is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965; or

(iii) certifies that the trip meets the requirements specified in rules prescribed by the Committee on Standards of Official Conduct to implement paragraph (b)(1)(C)(ii) of this clause and specifically details the extent of any involvement of a registered lobbyist or agent of a foreign principal in the planning, organization, request, or arrangement of the trip considered to qualify as *de minimis* under such rules;

(C) that the source will not accept from another source any funds earmarked directly or indirectly for the purpose of financing any part of the trip[.]

I. RELEVANT PROVISIONS UNDER THE COMMITTEE ON STANDARDS OF OFFICIAL CONDUCT TRAVEL GUIDELINES AND REGULATIONS (EFFECTIVE MARCH 1, 2007)

Section B—Reasonableness of Travel Expenses

* * * * *

(3) Lodging

(a) For travel to events arranged or organized *without regard* to congressional participation (for example, annual meetings of business or trade associations or other Membership organizations), Members, officer and employees may accept lodging accommodations at a pre-arranged location for event attendees commensurate with those customarily provided to or purchased by other event attendees. The quality or location of the accommodations may not be enhanced because of the official position of the Member, officer or employee. [*emphasis in original*]

* * * * *

Section D—Direct and Immediate Relationship Between Source of Funding and an Event

Expenses may only be accepted from an entity or entities that have a significant role in organizing and conducting a trip, and that also have a clear and defined organizational interest in the purpose of the trip or location being visited. Expenses may not be accepted from a source that has merely donated monetary or in-kind support to the trip but does not have a significant role in organizing and conducting the trip.

J. RELEVANT PROVISIONS OF THE RULES OF THE COMMITTEE ON
STANDARDS OF OFFICIAL CONDUCT

Rule 3—Advisory Opinions and Waivers

Clause (k). The Committee may take no adverse action in regard to any conduct that has been undertaken in reliance on a written opinion if the conduct conforms to the specific facts addressed in the opinion.²⁴

III. NARRATIVE SUMMARY OF EVIDENCE

A. THE 2007 CARIB NEWS FOUNDATION MULTI-NATIONAL BUSINESS
CONFERENCE

1. Attendance by Members and Staff

The Investigative Subcommittee confirmed, through interviews and the review of documents filed with the Standards Committee and the Office of the House Clerk, that the Members and staff who received transportation and lodging to attend the 2007 Multi-National Business Conference in Antigua were:

- Representative Stephanie Tubbs Jones (now deceased), accompanied by her sister Barbara Walker;²⁵
- Representative Charles Rangel;
- Representative Bennie Thompson, accompanied by his wife, Dr. London Thompson;
- Delegate Donna Christensen;
- Representative Yvette Clarke; and,
- George Dalley, former Chief of Staff to Representative Charles Rangel.²⁶

2. Pre-travel Approval Process

The first contact between anyone at the Foundation and the Standards Committee regarding the 2007 conference came before Ms. Louis submitted the sponsor form to the invitees.²⁷ A review of email communications and interviews disclosed that Ms. Louis first contacted Ms. Mobley in September 2007.²⁸ At the time, Ms. Mobley was Representative Tubbs Jones' designated counsel to the Standards Committee.²⁹ Representative Tubbs Jones was the Chair of the Standards Committee at the time.³⁰ According to the testimony of Patricia Louis, Karl Rodney, and Faye Rodney, Representative Tubbs Jones advised them that Ms. Mobley would be their point of contact for the 2007 conference.³¹ Ms. Louis sent an email to that effect on September 17, 2007, to George Dalley (former Chief of Staff to Representative Rangel) and Shelley Thomas (scheduler for Representative Christensen).³²

²⁴ Rules of the Comm. on Standards of Official Conduct, adopted February 10, 2009.

²⁵ Neither the Standards Committee nor the Investigative Subcommittee has jurisdiction over Representative Tubbs Jones. Representative Tubbs Jones passed away on August 20, 2008.

²⁶ Neither the Standards Committee nor the Investigative Subcommittee has jurisdiction over George Dalley due to his retirement from the House of Representatives on June 30, 2009.

²⁷ See Exhibit 10.

²⁸ *Id.*

²⁹ Mobley August 11, 2009, Tr. at 4.

³⁰ *Id.*

³¹ Investigative Subcommittee interviews of Karl Rodney on October 28, 2009; Faye Rodney on October 27, 2009; and Patricia Louis on November 18, 2009.

³² See Exhibit 9.

On September 17, 2007, Ms. Louis sent an email to Ms. Mobley referencing an earlier communication between the two regarding the 2007 conference.³³ In the email, Ms. Louis mentioned that Ms. Mobley had asked for a program for the 2007 conference and Ms. Louis was still working on providing one to her.³⁴ Ms. Mobley forwarded the email to Bill O'Reilly, the Staff Director and Chief Counsel to the Standards Committee at the time.³⁵ Ms. Mobley asked Mr. O'Reilly to assign someone to review the trip.³⁶ Mr. O'Reilly forwarded the email from Ms. Louis to Ms. Olson and asked her to handle the trip review.³⁷

Ms. Olson began communicating with Patricia Louis and Mr. and Mrs. Rodney to collect additional information and to clarify the information provided by the Foundation on the sponsor form.³⁸ A review of email communications between Ms. Olson and Ms. Mobley, Bill O'Reilly and Patricia Louis, revealed that Ms. Olson raised several concerns regarding sponsorship of the conference.³⁹ Karl Rodney and Patricia Louis did not list additional sponsors on the sponsor form for the 2007 conference.⁴⁰ However, they identified several contributors as sponsors in the 2007 conference agenda and listed some contributors in Question 12 of the sponsor form they submitted to the Standards Committee for preliminary review.⁴¹

(a) Information Provided By Susan Olson

Ms. Olson was interviewed by counsel assigned to the Investigative Subcommittee on July 21, 2009. Ms. Olson stated that Bill O'Reilly assigned her to review the 2007 conference.⁴² She began reviewing the paperwork Ms. Louis submitted to the Standards Committee for a preliminary review and noted several problems related to the trip sponsors.⁴³ According to Ms. Olson, Ms. Louis identified contributors as sponsors on the agenda and on the conference Web site, but did not list them as sponsors on the sponsor form.⁴⁴ Corporations were also listed in response to question 12 on the first sponsor form Ms. Louis submitted to the Standards Committee.⁴⁵ However, only the Foundation was identified as the sponsor in question 1 of the sponsor form.⁴⁶ Ms. Olson sent numerous emails to Patricia Louis regarding the corporations and Government of Antigua to ascertain their role with the conference.

Based on her understanding of the information provided by the Foundation, Ms. Olson advised Mr. O'Reilly and Ms. Mobley that, in her opinion, the corporations were co-sponsors and must be identified as such on the sponsor form.⁴⁷ Additionally, Ms. Olson advised Mr. O'Reilly and Ms. Mobley that, in her opinion, since at least one of the corporations identified on the sponsor form and in

³³ See Exhibit 10.

³⁴ *Id.*

³⁵ See Exhibit 11.

³⁶ *Id.*

³⁷ *Id.*

³⁸ Investigative Subcommittee staff interview of Susan Olson on July 21, 2009.

³⁹ *Id.* See also Exhibit 8.

⁴⁰ See Exhibit 13.

⁴¹ *Id.*

⁴² Olson Tr. at 3.

⁴³ *Id.*

⁴⁴ See Exhibits 12–13.

⁴⁵ See Exhibit 12.

⁴⁶ *Id.*

⁴⁷ See Exhibit 14.

the responses from Ms. Louis retained or employed lobbyists, the trip had to be limited to a one-day event.⁴⁸

Mr. O'Reilly instructed Ms. Olson to investigate the issue further.⁴⁹ Ms. Olson was unaware that Ms. Mobley had already been in contact with Ms. Louis.⁵⁰ Ms. Mobley told Ms. Olson and Mr. O'Reilly that she received information from Ms. Louis that the corporations were not sponsors after all.⁵¹ Ms. Olson asked if she should get additional clarification on the roles of the corporations based on Ms. Louis' responses.⁵² However, Mr. O'Reilly instructed her "no, he didn't think it was necessary."⁵³

Ms. Olson explained her understanding of what an "earmark" of funds is under the rules.⁵⁴ When funds are given for the purpose of holding a conference and the entity giving the funds does not designate those funds to be used for congressional attendance at the event, the funds would not be considered earmarked under the rule, according to Ms. Olson.⁵⁵ She also explained that a sponsor must take part in planning and organizing the event.⁵⁶ If the sponsor is not participating in, planning or organizing the event and is only providing financial support, the trip could not be approved.⁵⁷

In this case, Ms. Olson was concerned that the corporations were contributing funds directly to the conference and should either be listed as sponsors or, because they did not participate in planning and organizing the conference, the trip would not be approvable.⁵⁸ She requested further information from the Foundation to determine if the corporations were paying for any of the expenses of the Members.⁵⁹ The Foundation assured her they were not, but represented that the corporations contributed generally to the Foundation and not specifically to the conference.⁶⁰

Ms. Olson explained that, because the corporations listed by the Foundation for the 2007 conference employed or retained lobbyists, the trip would have to be limited to a one-day event if they contributed specifically to the conference and not to the general fund of the Foundation.⁶¹ Based on a response from Ms. Louis that the "corporations contributed to the overall expenses of the conference" and because of their identification as sponsors on the agenda and other conference related materials, Ms. Olson believed the corporations did contribute specifically to the conference and not the general fund of the Foundation.⁶² Ms. Olson sent an email to Dawn Mobley and Bill O'Reilly to that effect.⁶³ Ms. Olson was unaware that Ms. Mobley forwarded her email to Ms. Louis.⁶⁴

Ms. Olson related that part of her concern about the sponsors of the 2007 conference arose from the fact that, before the travel rule

⁴⁸ *Id.*

⁴⁹ Olson Tr. at 26.

⁵⁰ *Id.* at 24.

⁵¹ See Exhibit 15.

⁵² *Id.*

⁵³ Olson Tr. at 29.

⁵⁴ *Id.* at 9–10.

⁵⁵ *Id.*

⁵⁶ *Id.* at 10.

⁵⁷ *Id.*

⁵⁸ *Id.* at 10, 15 and 19.

⁵⁹ See Exhibit 15.

⁶⁰ *Id.*

⁶¹ Olson Tr. at 3. See also Olson Tr. at 7, 15 and 35.

⁶² *Id.* at 15–16.

⁶³ See Exhibit 15.

⁶⁴ Olson Tr. at 52–53.

changes in 2007, the Foundation had always identified these same corporate entities as being co-sponsors of the previous annual conferences.⁶⁵ Ms. Olson wanted to ensure that the entities were contributing to the general fund of the Foundation and not specifically to the conference.⁶⁶ She indicated that she addressed her concerns in a series of emails to Bill O'Reilly and Dawn Mobley.⁶⁷ When asked why she sent emails to Ms. Mobley, Ms. Olson responded that she was directed to do so by Mr. O'Reilly.⁶⁸ Ms. Olson further stated that the initial assignment for her to conduct the pre-travel review actually came from Ms. Mobley through Mr. O'Reilly.⁶⁹ Ms. Olson further related that there were a series of emails between Ms. Mobley and Ms. Louis, which she found to be unusual even though Ms. Mobley worked in the office.⁷⁰ Of the hundreds of submissions received by the Committee for pre-travel approval, Ms. Olson only recalled one other occasion when Ms. Mobley was involved in a trip approval.⁷¹ The particular trip was one that the Chair was participating in and Ms. Olson had recommended denying approval for that trip.⁷²

Ms. Olson discussed the process for reviewing and approving or denying a proposed trip.⁷³ She explained that usually the Standards Committee would receive the pre-travel forms, agenda, and other materials from the invitee.⁷⁴ A review could not be completed until all the materials were received.⁷⁵ She explained that during the review process, the agenda and forms are reviewed to verify that the trip is officially connected to the Member's duties and that the Member's time during the trip is fully accounted for.⁷⁶ She explained that there cannot be a lot of free time on the schedule, and that the Members must either be attending or participating in various sessions during most of the time they are present at a conference.⁷⁷ As part of her review of the 2007 Conference, Ms. Olson began reviewing the agenda she received from Ms. Mobley.⁷⁸ This review occurred before the Foundation submitted any signed paperwork to the invitees.⁷⁹ Ms. Olson believed that the Foundation "wanted kind of an idea of whether or not this proposed agenda would be something that we would approve."⁸⁰

Ms. Olson also explained her process in dealing with Post-Travel Disclosure Forms.⁸¹ She explained that she reviews the post-travel forms after they are filed with the Clerk's office to make sure all of the information is provided.⁸² She also compares the post-travel information with the pre-travel forms to make sure that there are not any significant differences between the two, such as the length

⁶⁵*Id.* at 17.

⁶⁶*Id.* at 15–16.

⁶⁷*Id.*

⁶⁸*Id.* at 19.

⁶⁹*Id.* at 20–21.

⁷⁰*Id.* at 20.

⁷¹*Id.* at 21–23.

⁷²*Id.*

⁷³*Id.* at 5–6.

⁷⁴*Id.* at 32.

⁷⁵*Id.* at 4–5.

⁷⁶*Id.* at 36.

⁷⁷*Id.* at 36–37.

⁷⁸*Id.* at 34–35.

⁷⁹*Id.*

⁸⁰*Id.* at 35–36.

⁸¹*Id.* at 56–57.

⁸²*Id.* at 56.

of stay or the Member being accompanied by a family member who was not previously identified or approved.⁸³

Ms. Olson stated that during the 2007 conference, she was notified of a non-approved trip taken by some of the Members.⁸⁴ Some of the Members traveled to Montserrat, West Indies, to view damage caused by a volcano.⁸⁵ The trip involved travel to another island paid for by a foreign government that was not included in the approved agenda.⁸⁶ This was a major change to the approved travel itinerary and was not allowed under the Foreign Gifts and Declarations Act (FGDA).⁸⁷ The trip to Montserrat could not be approved because it was not permitted under the provisions in the FGDA.⁸⁸ The Members who took part in the trip were instructed to repay the costs and did so.⁸⁹

Ms. Olson opined that a traveler has an obligation to report any changes to a trip that they become aware of when completing their post-travel forms.⁹⁰ Ms. Olson stated there was no published guidance regarding this issue.⁹¹ However, because the post-travel form requires the traveler to certify the information provided is accurate, it was her opinion that this certification created an obligation to report any changes.⁹²

Ms. Olson explained that prior to the 2007 conference a potential sponsor's status as a non-profit organization was not routinely examined by the Standards Committee staff.⁹³ Ms. Olson stated that since the 2007 conference, she began reviewing the tax filing status of private sponsors to verify their non-profit status.⁹⁴ Ms. Olson explained that she understood there were certain tax provisions that related to travel paid by private foundations.⁹⁵ Ms. Olson now routinely verifies the private sponsor's status through the Internal Revenue Service's (IRS) Web site to determine whether the sponsor is registered with the IRS as a public charity, private foundation, or for-profit corporation during her review of privately-sponsored travel.⁹⁶ Currently, there is no distinction made in the House Rules between a public charity and a private foundation.⁹⁷ According to Ms. Olson, at the time the trip was reviewed, there were no policies in place regarding private foundations.⁹⁸ As long as the trip met the requirements under House Rules, the trip could be approved, even if the Internal Revenue Code (I.R.C.) imposed tax penalties for such travel payment or reimbursement.⁹⁹ The Standards Committee has provided some advice to Members relating to the I.R.C. before 2007, but not in all cases.¹⁰⁰

⁸³ *Id.* at 56-57

⁸⁴ *Id.* at 57-60.

⁸⁵ *Id.*

⁸⁶ *Id.*

⁸⁷ *Id.* at 57.

⁸⁸ *Id.* at 57-60.

⁸⁹ *Id.*

⁹⁰ *Id.* at 61-63.

⁹¹ *Id.* at 64.

⁹² *Id.* at 64-65.

⁹³ *Id.* at 63.

⁹⁴ *Id.*

⁹⁵ *Id.* at 64.

⁹⁶ *Id.* at 65.

⁹⁷ *Id.* at 67-68.

⁹⁸ *Id.* at 68.

⁹⁹ *Id.*

¹⁰⁰ *Id.* at 66.

A review of email communications between Ms. Olson and Ms. Louis regarding the 2007 conference indicates that the Foundation initially identified several companies as co-sponsors of the event.¹⁰¹ The unsigned sponsor form first submitted by the Foundation to the Standards Committee for its pre-review identified corporations and the reasons for their participation at the 2007 conference in the response to question 12.¹⁰² In the response to question 12, Patricia Louis wrote: “Pfizer-Education/Health, AT&T, and IMB—provide technology to the region, MACY’s—seeks new vendor source, Citibank—opportunities in the region.”¹⁰³

The instructions provided to the Foundation for completing the sponsor form gave the following instructions for answering question 12:

Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip: *The sponsor(s) (the entity or entities paying for the trip) should be the entity primarily responsible for organizing the trip. Travel may not be accepted from an entity that merely contributes money towards the travel and is not otherwise involved in planning or conducting the trip.*¹⁰⁴

Ms. Olson provided the following copies of the email exchanges between herself, Patricia Louis, Dawn Mobley, and Bill O’Reilly to the Investigative Subcommittee. The emails begin with the first email to Dawn Mobley on September 17, 2007.

From: plouis¹⁰⁵
Sent: Monday, September 17, 2007 3:47 PM
TO: Kelly Mobley, Dawn
Subject: Draft Program—2007 Business Conference

Ms. Mobley:

We spoke earlier re permission for Members to attend the Conference and you asked for the program. I have not gotten back to you because we have been working on getting the program together.

Attached is a draft for your guidance

Regards and Thanks

Patricia Louis

Executive Assistant

CARIB NEWS

7 West 36th Street, 8th Floor

New York, NY 10018.¹⁰⁶

Ms. Mobley responded to this email at 5:53 p.m. on the same date:

To: plouis
Subject: RE: Draft Program—2007 Business Conference

¹⁰¹ See Exhibit 13.

¹⁰² *Id.*

¹⁰³ *Id.* See also Louis November 18, 2009, Tr. at 25.

¹⁰⁴ *Id.* (Italics in original).

¹⁰⁵ All emails addresses throughout this report were redacted to protect the privacy of the parties involved.

¹⁰⁶ See Exhibit 10.

Nothing was attached to this email. Therefore, we have not received the proposed agenda you mention below and have nothing to preview.¹⁰⁷

On September 18, 2007, Ms. Louis responded:

Sorry for the omission. Program now attached.¹⁰⁸

On September 18, 2007, Ms. Mobley forwarded the response from Ms. Louis to Bill O'Reilly:

Would you please have someone look at this proposed travel agenda for the Chairwoman? The trip is in November but she'd like to talk with someone about it later this week. There is an entertainment component which doesn't appear to be clear yet. Let me know who will have it please? Dawn¹⁰⁹

On September 19, 2007, Mr. O'Reilly forwarded the above emails to Susan Olson along with this email:

Have you dealt with the Carib News travel before? I have a hazy memory of looking at this trip last year. Can you review this and work with Dawn or the Chairwoman to answer any questions they have?¹¹⁰

At 1:56 p.m. on September 21, 2007, Patricia Louis sent the following email to Dawn Mobley, who in turn forwarded it to Ms. Olson and Mr. O'Reilly:

The official sponsor of the conference is the CARIB NEWS FOUNDATION, a not-for-profit 501C3 Organization that provides educational information about the Caribbean region and its relationship with the U.S. in doing business and developing good neighborly ties with the United States, security, health, education etc.

The CARIB NEWS FOUNDATION does not retain or employ a registered lobbyist or registered foreign agent. Please use me as your contact for the purposes of this conference. The form will be emailed to you this afternoon.

Regards¹¹¹

On the same date, the draft sponsor form listing the previously identified corporations in the response to question 12 was faxed to the Standards Committee.¹¹²

On October 2, 2007, Ms. Mobley forwarded an email she received from Ms. Louis on October 1, 2007, with her comments:

From: Kelly Mobley, Dawn
Sent: Tuesday, October 2, 2007 12:05 PM
To: Olson, Susan
Subject: FW: Please read query below

Susan: See CARIB News' email below in response to my voice message about sponsorship. Please speak with Patri-

¹⁰⁷ See Exhibit 16.

¹⁰⁸ See Exhibit 17.

¹⁰⁹ See Exhibit 11.

¹¹⁰ *Id.*

¹¹¹ This email not included as an Exhibit.

¹¹² See Exhibit 13.

cia Lewis of CARIB News so we can start to process this travel; if possible.

I have kept the Chairwoman updated on this matter and will let her know you will begin the process.

I still have the information on my desk. Feel free to grab it at your convenience.

Dawn¹¹³

From: plouis

Sent: Monday, October 01, 2007 6:40 PM

To: Kelly Mobley, Dawn

Subject: RE: Please read query below

The conference dates are November 8–11, 2007: and opens on Thursday November 8 and ends the morning of November 11, 2007—(3 nights).

CARIB NEWS FOUNDATION is the Sponsor of the event.

Item No. 12: The companies like Pfizer, AT&T are donors/contributors of grants to the Foundation.

For educational purposes and NOT the SPONSOR, consequently I assume the information contained in that item will have to be changed.

Awaiting your advice.¹¹⁴

This email exchange suggests that Ms. Mobley had contacted Ms. Louis by phone and left her a message regarding the sponsorship issue. Ms. Louis then responded to clarify that the corporations she originally identified as sponsors, both on the sponsor form, and the original agenda, were not sponsors of the conference but contributors to the Foundation.¹¹⁵ Subsequently, Ms. Olson continued to inquire about the status of the corporations identified in the agenda and the travel form.¹¹⁶ Ms. Olson sent the following email to Ms. Louis on October 10, 2007:

From: Olson, Susan

Sent: Wednesday, October 10, 2007 4:01 PM

To: plouis

Cc: Dawn Kelly Mobley; O'Reilly, Bill

Subject: Carib News—Pre-trip Approval Issues

Dear Mrs. Louis:

With regard to the pre-trip approval requests for the Carib News Foundation's (Foundation) trip to Antigua, the issues involving sponsorship are as follows:

While the sponsor form that you completed indicates that the Foundation is the sole sponsor of the 2007 trip, the draft schedule, however, indicates that the following entities are "sponsoring" sessions, events, etc. during this trip"

Antigua Government; Sandals; Royal Caribbean Bakery; CITI; Pfizer; Macy's; AT&T; HSBC; IBM; Goodworks International; Preferred Health Partners; Antigua & Barbuda; American Airlines; and Golden Krust.

¹¹³ See Exhibit 18.

¹¹⁴ *Id.*

¹¹⁵ See Exhibit 18.

¹¹⁶ See Exhibit 19.

Last year the Foundation provided the following information regarding these “additional sponsors” for the November 9 to 12, 2006 trip:

The Foundation, which is a 501(c)(3) nonprofit organization, will be paying for the Members’ travel expenses including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a “contribution to the overall pool of expenses in contribution to the [Foundation],” which is used to “underwrite the overall expenses of the Conference,” primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organization who will be attending and participating in the Conference.

Accordingly, the Committee’s Advisory Opinion, dated October 27, 2006, provided that all of the organizations that provided financial underwriting for the trip along with the Foundation were required to be listed as the “trip sponsors” on the participating Members’ post travel disclosure form and their 2006 annual financial disclosure statements.

Accordingly, you need to provide information describing the role of these “additional sponsors” as listed in the 2007 trip draft schedule for this current trip. Without such information, I cannot proceed with the review of the pre-trip approval requests for the Foundation’s Antigua trip.¹¹⁷

Ms. Louis sent the following email to Dawn Mobley, Shelley Thomas and George Dalley after receiving the above email from Ms. Olson:

From: plouis
 Sent: Wednesday, October 10, 2007 5:56 PM
 To: Kelly Mobley, Dawn; Thomas, Shelley; Dalley, George
 Subject: FW: Carib News—Pre-trip Approval Issues

Please see email I received from Ms. Olson of the Committee on Standards of Official Conduct.

A possible response could be: The sponsors contribute to the overall expense of the trip and the general work of the Foundation. As a courtesy, each contributor is given an opportunity to be attached to a part of the program that is being presented. They do not determine the content or the other participants in the Conference.

Please advise us.¹¹⁸

From the content of this email, it is clear that Ms. Louis is asking Ms. Mobley, Ms. Thomas, and Mr. Dalley to assist her in providing a response to Ms. Olson’s question about the corporations listed on the agenda and what their role was to the conference. There is no evidence that Mr. Dalley responded to this email. Ms. Thomas responded to Ms. Louis’ email above that she was not aware of the new procedures.¹¹⁹ Ms. Mobley responded with the following email:

¹¹⁷ See Exhibit 15.

¹¹⁸ See Exhibit 20.

¹¹⁹ Ms. Thomas’ email response is not included as an exhibit.

From: Kelly Mobley, Dawn
 Sent: Wednesday, October 10, 2007 6:49 PM
 To: plouis
 Subject: Re: Carib News—Pre-trip Approval issues

Her question centers on whether any of these “co-sponsors” retains a lobbyist or foreign. This is the issue you and I focused on previously. It is a central problem if any do and a repaying for the events. If so, you are in the same position as last year with only one day events. Call Susan back tomorrow as early as possible. Hopefully, these co-sponsors don’t retain lobbyists, but you should have their representations on this matter. At a minimum, Macy’s does right? Alternatively if they are only sponsoring event tables or the like, a lobbyist will not be problematic.¹²⁰

It should be noted that Ms. Mobley’s response to Ms. Louis did not include Ms. Olson as a recipient.¹²¹ Ms. Mobley told the Subcommittee that she did not include Ms. Olson on emails to protect the confidentiality of Ms. Olson’s email address and the inner deliberations of the Standards Committee, but did share the information with Ms. Olson.¹²² Ms. Mobley also told the Subcommittee that she shared this email to help “work through the kink.”¹²³ However, the Subcommittee could find no similar email sent from Ms. Mobley to Ms. Olson or Mr. O’Reilly. Additionally, as indicated in the emails already discussed, Ms. Olson and Ms. Louis had already been sending email communication to each other so Ms. Louis would have already had Ms. Olson’s email address.¹²⁴ Ms. Olson’s emails to Ms. Louis included Ms. Mobley and Mr. O’Reilly as recipients, as indicated in the emails from Ms. Olson above.¹²⁵ Ms. Olson also told Subcommittee counsel she was unaware that Ms. Mobley continued to communicate with Ms. Louis after she began the trip review.¹²⁶ During her interview with counsel to the Subcommittee, and subsequently her sworn testimony before the Subcommittee, Ms. Louis could not explain why she sent Ms. Olson’s email and her proposed response to Shelley Thomas, George Dalley and Ms. Mobley, other than to state that she had been communicating with all of them during the trip review process.¹²⁷

On Thursday, October 11, 2007, Ms. Louis sent the following email to Ms. Olson in response to her email requesting clarification on the roles of the corporations identified on the agenda:

From: plouis
 Sent: Thursday, October 11, 2007 10:37 AM
 To: Olson, Susan
 Subject: RE: Carib News—Pre-trip Approval issues

Ms. Olson,
 In response to your email:

¹²⁰ See Exhibit 20.

¹²¹ *Id.*

¹²² Mobley December 15, 2009, Tr. at 23.

¹²³ *Id.* at 42.

¹²⁴ See Exhibits 15, 19, 21, 23, 24, 26, 28.

¹²⁵ *Id.*

¹²⁶ Olson Tr. at 24.

¹²⁷ Subcommittee staff interview of Patricia Louis on October 14, 2009. See also Louis Tr. at 36.

The sponsors contribute to the overall expenses of the trip and the general work of the Foundation.

As a courtesy, each contributor is given an opportunity to be attached to a part of the program that is being presented. They do not determine the content or the other participants in the Conference.

Federally registered lobbyists or foreign agents will not be accompanying the Members or participating in the program.

Regards ¹²⁸

Of note is that the response to Ms. Olson above contains the same proposed language that Ms. Louis sent to Ms. Mobley asking for advice and contains an additional line regarding lobbyists and “foreign agent.”¹²⁹ This additional line seems to correlate directly with Ms. Mobley’s response to Ms. Louis, as the actual language in the rules uses the term “agents of a foreign principal.” Ms. Mobley made it clear to Ms. Louis that there would be a problem if “these co-sponsors’ retains a lobbyists or foreign [sic],” and Ms. Louis’s response added the statement regarding lobbyists and foreign agents.¹³⁰ After receiving the above response from Ms. Louis, Ms. Olson forwarded the response to Bill O’Reilly and Dawn Mobley along with the following email:

From: Olson, Susan
 Sent: Friday, October 12, 2007 9:29 AM
 To: O’Reilly, Bill; Kelly Mobley, Dawn
 Subject: FW: Carib News—Pre-trip Approval issues
 Bill and Dawn,

Please note the following response from Ms. Louis at Carib News. Unfortunately, it appears that if each sponsor contributes funding directly to the trip (an earmark of funds) and not simply to the general funds of Carib News, then the assumption is that all of these entities are co-sponsors of the trip for the purposes of the House travel rules. If that is the case and since it is likely that at least one of these co-sponsors hires or retains a federally registered lobbyist, the trip could only be a one-day event trip. Thus the Committee can’t approve the trip as it currently exists.

But, if you have a different interpretation of the below information from Ms. Louis, please do let me know.
 Thanks! Susan ¹³¹

Mr. O’Reilly responded at 11:09 a.m. stating, “That’s always been my understanding of the rules—can you also run this by others to see if anyone has any other thoughts.”¹³² In turn, Ms. Olson forwarded the string of emails to other staff in the office as suggested and asked them to review her analysis.¹³³ She sent the emails to Carol Dixon, John Sassaman, Peter Van Hartesveldt, Tonia Smith,

¹²⁸ See Exhibit 21.

¹²⁹ *Id.*

¹³⁰ *Id.*

¹³¹ See Exhibit 14.

¹³² *Id.*

¹³³ *Id.*

Ken Kellner, and Morgan Kim, all of whom were Standards Committee counsels.¹³⁴

Ms. Olson also received a response from Ms. Mobley as indicated in the following email:

From: Kelly Mobley, Dawn
 Sent: Friday, October 12, 2007 1:49 PM
 To: Olson, Susan; O'Reilly, Bill
 Subject: RE: Carib News—Pre-trip Approval issues

Did their travel form indicate that the others directly fund the trip? I had difficulty speaking with Ms. Louis. She is Carribean [sic] and simply did not understand terminology; specifically the meaning of “sponsor”. Before I asked you to look into this matter, Ms. Louis said Macy’s and the others were not paying for the trip or organizing. Carib News organized, funded, and arranged the travel. It is my understanding that the groups she calls “sponsors” below, will be participants at the program. As such, she uses the terms “contributors”, “sponsors”, and “participants” interchangeably. Ms. Louis indicated that these other organizations support the Carib News Foundation on an annual basis.

Would you speak with her or the director, Mrs. Rodney, directly about this? I think it is a matter of misunderstanding and needs direct clarification.

Thanks,
 Dawn¹³⁵

Ms. Olson subsequently sent the following email to Ms. Louis on October 12, 2007, asking for further clarification regarding the corporations:

From: Olson, Susan
 Sent: Friday, October 12, 2007 2:41 PM
 To: plouis
 Cc: Kelly Mobley, Dawn; O'Reilly, Bill
 Subject: RE: Carib News—Pre-trip Approval issues
 Ms. Louis,

Please explain more in detail your email message below relative to the “sponsors contribute to the overall expense of the trip.” In this regard, do the following entities pay for any of the expenses of the trip for the invited House Members, including roundtrip air transportation costs, lodging costs, meal costs, cost of a particular meal or reception, etc?

Antigua Government; Sandals; Royal Caribbean Bakery; CITI; Pfizer; Macy’s; AT&T; HSBC; IBM; Goodworks International; Preferred Health Partners; Antigua and Barbuda; American Airlines; and Golden Krust.¹³⁶

Ms. Louis responded at 3:08 p.m. with the following email:

From: plouis
 Sent: Friday, October 12, 2007 3:08 PM

¹³⁴ *Id.*

¹³⁵ *See* Exhibit 22.

¹³⁶ *See* Exhibit 23.

To: Olson, Susan
 Subject: RE: Carib News—Pre-trip Approval issues

Ms. Olson,

I sent you a fax indicating that the companies are not sponsors or co-sponsors of any part of the trip and play no role in the planning or content. They are participants. The program has been amended to reflect this.

I am sorry for the misunderstanding and confusion and thank you for your patience.

Regards and Thanks¹³⁷

The facsimile Ms. Louis referred to in her email states in part:

. . . the Conference is paid for by CARIB NEWS FOUNDATION. The Companies are participants. They are not sponsors or co-sponsors for any part of the trip and play no role in the planning or content.¹³⁸

After receiving Ms. Louis's response and the fax, Ms. Olson sent another email to Bill O'Reilly and Dawn Mobley asking for further guidance, forwarding Ms. Louis's response:

From: Olson, Susan
 Sent: Friday, October 12, 2007 4:28 PM
 To: O'Reilly, Bill; Kelly Mobley, Dawn
 Subject: FW: Carib News—Pre-trip Approval issues

Do you want me to ask Ms. Louis this follow-up question, as I am concerned that she doesn't specifically address the funding issue, or is this simply "beating the issue to death?"

Ms. Louis,

While you indicate that "the companies are not sponsors or co-sponsors of any part of the trip and play no role in the planning or content," I also need a specific assurance from you that the companies do not pay for any of the expenses of the trip for the invited House Members, including roundtrip air transportation costs, lodging costs, meals costs, cost of a particular meal or reception, etc.

Thank you!

Susan¹³⁹

On October 12, 2007, at 6:13 p.m., Bill O'Reilly responded in an email to Ms. Olson and Ms. Mobley stating:

I'd like an answer to that question, but am wondering if she is the right person to provide it at this point. I'm certainly not confident that those entities are not sponsors, as it looks like we said last year that they were sponsors. But if they can affirmatively and cleanly state what you've asked below I'd be inclined to accept the representation.¹⁴⁰

Ms. Mobley responded to Mr. O'Reilly's email at 6:18 p.m. stating, "Their Directors are Mr. and Mrs. Rodney who could be queried at the same number."¹⁴¹

¹³⁷ See Exhibit 24.

¹³⁸ See Exhibit 25.

¹³⁹ See Exhibit 26.

¹⁴⁰ *Id.*

¹⁴¹ See Exhibit 27.

On Monday, October 15, 2007, Ms. Louis sent another email to Ms. Olson responding to her email from October 12, 2007:

From: plouis
 Sent: Monday, October 15, 2007 10:48 AM
 To: Olson, Susan
 Subject: RE: Carib News—Pre-trip Approval issues
 Ms. Olson,

In response to your email, the answer to your question is NO. Regards and Thanks for your patience.¹⁴²

After receipt of the above email, Ms. Olson sent another email to Mr. O'Reilly and Ms. Mobley in which she asked, "In light of the following response from Ms. Louis, shall I still pursue the funding issue with Mr. and Mrs. Rodney?"¹⁴³ Ms. Mobley responded to Ms. Olson's email stating, "If you feel the need to do so. It is my understanding that the Rodneys will be in the office this morning. If you call soon, you will probably get one of them directly."¹⁴⁴

According to Ms. Olson, when she asked Mr. O'Reilly if she should ask the question he advised her that it was not necessary.¹⁴⁵ Mr. O'Reilly did not recall giving her this instruction.¹⁴⁶

At the same time these email communications were occurring between Ms. Olson and Ms. Louis, Ms. Mobley was also in direct contact with Ms. Louis, without Ms. Olson's knowledge.¹⁴⁷ For example, on October 12, 2007, after Ms. Olson sent her email to Bill O'Reilly and Dawn Mobley at 9:49 a.m. discussing Ms. Louis's response, Ms. Mobley forwarded the internal Standards Committee email, in violation of Standards Committee Rules 3(j) and 7(d), to Ms. Louis attached to the following email:¹⁴⁸

From: Kelly Mobley, Dawn
 Sent: Friday, October 12, 2009 9:59 AM
 To: 'plouis'
 Subject: FW: Confidential

Please read both emails below. Give Susan a call as soon as you work through the kink, let her know you are following up. Please make yourself available to work through this matter today. Thank you Patricia. (These other organizations can participate in the program but should not help pay for the trip).¹⁴⁹

This was the first communication that used the word "participate" but does not call the corporations "participants."¹⁵⁰ However, the email from Ms. Olson indicated that if the corporations were paying for any part of the trip they would have had to be identified as co-sponsors and the trip would have had to be limited to a one day event.¹⁵¹ It should also be noted that the subject line in the email sent from Ms. Mobley to Ms. Louis was changed from

¹⁴² See Exhibit 28.

¹⁴³ See Exhibit 29.

¹⁴⁴ See Exhibit 30.

¹⁴⁵ Olson Tr. at 31.

¹⁴⁶ O'Reilly Tr. at 54.

¹⁴⁷ Olson Tr. at 52-53.

¹⁴⁸ See Exhibit 31.

¹⁴⁹ *Id.*

¹⁵⁰ *Id.*

¹⁵¹ See Exhibit 14.

“Carib News—Pre-trip Approval issues” to “Confidential.”¹⁵² Ms. Mobley then sent another email to Ms. Louis at 11:55 a.m. on October 12, 2007, which read, “Have you spoken with your Director and explained the problem so you can call Olson today?”¹⁵³ Later that day, Ms. Mobley sent another email to Ms. Louis:

From: Kelly Mobley, Dawn
 Sent: Friday, October 12, 2007 1:55 PM
 To: plouis
 Subject: RE: Confidential

The fax did not come through. I will be stepping out of the office for the remainder of the day, but will be in early Monday. Please follow up again with Susan. I have explained that the organizations you labeled as co-sponsors are not. They support your foundation annually, but have not and will not pay for the Members trip. This is simply a misunderstanding of the terms “sponsor”, “contributor”, and “participant” as used in the Ethics rules which is why I sent you the Rules book; for preparation.

Once you are able to clarify these issues and make sure your itinerary passes too, you should be fine. An Ethics Committee Staff Attorney must review and approve as well. Your Staff Attorney is Susan.¹⁵⁴

It is important to note that the above email from Ms. Mobley to Ms. Louis was sent at 1:55 p.m., six minutes after Ms. Mobley sent the email to Bill O’Reilly and Susan Olson, suggesting Ms. Louis may be confused with the terminology and 73 minutes before Ms. Louis’s response to Ms. Olson in which she states that the corporations are neither sponsors nor co-sponsors and identifies them for the first time as “participants.”¹⁵⁵

(b) Interviews of Dawn Kelly Mobley

On August 11, 2009, Dawn Kelly Mobley was interviewed by Subcommittee counsel regarding her involvement in the Foundation’s 2007 conference. Ms. Mobley, as indicated below, initially denied having any email communication with the Foundation or Patricia Louis.¹⁵⁶ She stated her first and only contact was a phone call from Patricia Louis in July or August 2007.¹⁵⁷ Of particular note is her response as to the reasons she heard of Carib News, to which she responded that she had received a call from someone at Carib News.¹⁵⁸ This statement is in conflict with her subsequent sworn testimony before the Subcommittee during which she indicated that the first time she heard about Carib News was when Bill O’Reilly handed her a post-it and asked her to call them:¹⁵⁹

Q. Have you ever heard of the Carib News Foundation?

A. I have.

Q. When was the first time you heard or became familiar with that foundation?

¹⁵² See Exhibit 31.

¹⁵³ *Id.*

¹⁵⁴ *Id.*

¹⁵⁵ *Id.*

¹⁵⁶ Mobley August 11, 2009, Tr. at 6.

¹⁵⁷ *Id.*

¹⁵⁸ *Id.*

¹⁵⁹ See *Infra* at p. 60 and n. 173. See also Mobley December 15, 2009, Tr. at 10, 15–17.

A. Somewhere about 2007. Maybe July or August 2007.

Q. So that was the first time you ever heard of the Carib News?

A. Absolutely.

Q. What was the reason you heard of them?

A. I received a phone call from someone from Carib News.

Q. Prior to that phone call, had you any meetings or calls or communications with anyone from Carib News before that?

A. No, I hadn't.

Q. Do you know who Karl Rodney is?

A. Yes. That is the owner of the Carib News.

Q. Do you know who Faye Rodney is?

A. I do not.

Q. Do you know who Patricia Louis is?

A. I spoke with Pat on the phone and—if that's the same person.

Q. From Carib News?

A. Yes.

Q. Did you have any communications or meetings personally with Karl Rodney?

A. No, I did not.

Q. You don't know who Faye Rodney is, so you won't remember whether you had any meetings with her?

A. No.

Q. Other than that one phone call you mentioned from Pat, did you ever have any other communications or meet personally with a Patricia Louis from Carib News?

A. I did not.

Q. Did you have any email communication with Patricia Louis from Carib News?

A. I did not.

Q. Do you recall an email sent from Patricia Louis received on September 17 regarding the 2007 Carib News conference?

A. I do not recall that.¹⁶⁰

Ms. Mobley later recalled a communication with Ms. Louis where she identified Susan Olson as the counsel assigned to review the trip.¹⁶¹ She did not recall the communication being in an email but believed it to be a phone call.¹⁶² Ms. Mobley was shown several emails between her and Ms. Louis but indicated that she did not recall any of the emails.¹⁶³ When she was asked about further communication with Ms. Louis after Ms. Olson was assigned to review the 2007 conference, Ms. Mobley stated she did not recall any further communication with Ms. Louis.¹⁶⁴ She also stated that, with respect to the 2007 conference, she did not recall any discussions among staff that she was involved in about the sponsors or what

¹⁶⁰ Mobley August 11, 2009, Tr. at 6.

¹⁶¹ *Id.* at 6–7.

¹⁶² *Id.* at 7.

¹⁶³ *Id.*

¹⁶⁴ *Id.* at 9.

the earmark would be.¹⁶⁵ She told Subcommittee counsel that it appeared to her that “Carib News, that Mr. Rodney was very confused about the whole process, and there was very little that [she] could provide for them other than to tell them to speak with the proper staff member who had been working on this and could hopefully help them.”¹⁶⁶

Ms. Mobley provided the following information in response to questions regarding Ms. Olson not being included on emails or other communications that Ms. Mobley had with Ms. Louis:

Q. Okay. Now did you tell Susan Olson anything about your conversations or your email that you were having with Ms. Louis?

A. Absolutely, I remember telling her, again, as I said, that I had concerns with this trip. I didn’t know what had happened in the past, but it certainly appeared to me that they were very confused. I could not help them very much because I was still trying to understand the rules myself. Whatever questions—I asked Susan several questions because I didn’t understand where the problem may lay, and Susan was a wealth of information.

Q. Would it have been helpful for you if you had included Susan on the emails?

A. Susan did receive—any of the emails that I remember, Susan would have gotten—

Q. The emails I just showed you do not list Susan as a recipient. It is strictly between you and Patricia Louis; is that right?

A. Those emails, yes.

Q. So you did not include Susan in any of those responses back to Patricia?

A. Very likely I could have sent them on to Susan. That is typically what we always do.

Q. What do you mean “sent them on?”

A. Sent them on, emailed them, sent them to Susan after.

Q. So you would have sent a separate email?

A. Yes. They would have been confidential communications with the staff, and therefore, I would not have put Susan’s name on any emails I sent to any of the other—the outsiders.¹⁶⁷

However, Ms. Olson stated that she was unaware of these communications.¹⁶⁸ Later during the interview, Ms. Mobley acknowledged that she had provided the internal email from Susan Olson to Patricia Louis to aid Ms. Louis in understanding Ms. Olson’s concern.¹⁶⁹

A review of emails disclosed that Ms. Mobley had additional contacts with Ms. Louis in September of 2007.¹⁷⁰ After her initial

¹⁶⁵ *Id.* at 12.

¹⁶⁶ *Id.*

¹⁶⁷ *Id.* at 29–30.

¹⁶⁸ Olson Tr. at 52–53. Ms. Olson provided Subcommittee counsel with copies of all the emails she had regarding this trip review. There were no emails included that were copies of emails sent by Ms. Mobley to Patricia Louis as indicated by Ms. Mobley.

¹⁶⁹ *Id.* at 39.

¹⁷⁰ See Exhibits 11, 17–18, 32.

email to Ms. Louis on September 17, 2007, Ms. Mobley sent Ms. Louis the following email on September 19, 2007:

From: Kelly Mobley, Dawn
 Sent: Wednesday, September 19, 2007 2:16 PM
 To: 'plouis'
 Subject: RE: Draft program—2007 Business Conference
 (No agenda or program attached)

Patricia:

I understand that several organizations will take part in sponsoring food and other parts of the Antigua travel. However, I need clarification of the official sponsor; that organization providing travel, lodging, and organizing the trip? Am I to assume it is CARIB NEWS? The official sponsoring organization must not retain or employ a registered lobbyist or foreign agent (and the sponsor must have a direct and immediate relationship with the event or location being visited). To assist with this, I am scanning information/guidelines and emailing in just a moment. Please provide a fax number if that method of submittal will be more helpful. If there is someone handling the matter, please provide their direct contact information as I must ensure adherence to these new guidelines pre-travel.

In any event, I do need to know who the official sponsor will be. I have assigned a staff attorney to review your documents and will remain in contact with you until this matter is finalized.

Please respond today or tomorrow at the latest. I will be traveling for a while thereafter and must ensure that my staff attorney has all that is necessary for a safe review.¹⁷¹

The above email warned Karl Rodney and Patricia Louis that the sponsors could not employ or retain lobbyists.¹⁷² This email may have influenced how Karl Rodney and Patricia Louis responded to Ms. Olson's inquiries and claims that the corporations were not sponsors in subsequent communications. Contrary to statements made during her interview with staff, it appears that Ms. Mobley was in regular contact with Ms. Louis and provided Ms. Louis with advice on what information to provide to the Standards Committee during the pre-trip review process.¹⁷³ It also appears that before responding to questions asked by Ms. Olson, Ms. Louis would contact Ms. Mobley seeking advice as to how to respond.¹⁷⁴

On December 15, 2009, Ms. Mobley provided sworn testimony before the Subcommittee. During this testimony, she again stated that she did not have any specific recollection of the email communications she had with Ms. Louis but did recall some communications.¹⁷⁵ She also restated her position that she informed Ms. Olson of all the communications she had with Ms. Louis.¹⁷⁶ In a letter she provided to the Subcommittee prior to her testimony, Ms. Mobley stated that she only became involved in the 2007 con-

¹⁷¹ See Exhibit 32.

¹⁷² *Id.*

¹⁷³ See Exhibits 11, 17–18, 32.

¹⁷⁴ See Exhibits 18, 32.

¹⁷⁵ Mobley December 15, 2009, Tr. at 13–14.

¹⁷⁶ *Id.* at 22–23.

ference review at the request of Mr. O'Reilly.¹⁷⁷ Ms. Mobley denied that Representative Tubbs Jones assigned her to work on the 2007 conference.¹⁷⁸ Ms. Mobley testified as follows:

Q. I want to go back up to the very next email, which is also on September 18, from you to Bill O'Reilly where it says: "Would you please have someone look at this proposed travel agenda for the chairwoman. The trip is in November, but she would like to talk to someone about it later this week. There is an entertainment component which doesn't appear to be clear yet. Let me know who will have it please."

A. Yes.

Q. And you don't recall this email. Is that correct?

A. No, I don't.

Q. But this email appears—and correct me if I am wrong, but it appears that you are forwarding the program that Ms. Louis attached to you to Mr. O'Reilly at this point. Is that pretty much your understanding of this email?

A. It says travel agenda, so I am going to assume it's a travel agenda. I don't know if it is the itinerary, but it says agenda. And I would have shared it with Bill and asked him to let me know who is going to be reviewing this matter.

Q. And then Bill O'Reilly sent a following email to Susan Olson asking her if she has ever dealt with the Carib News travel before. Is that right?

A. It says: Have you—it is to Susan. Have you dealt with the Carib News travel before? I have a hazy memory of looking at this trip last year. Can you review this and work with Dawn or the chairwoman to answer any questions they have. Bill O'Reilly.

Q. Now, earlier you had testified that you didn't do anything with Carib News until Mr. O'Reilly asked you to. But doesn't this email make it appear that you actually brought this trip up to Mr. O'Reilly first?

A. No, it doesn't. Actually, he came by my desk with the little sticky saying he had gotten a call and he wanted me to return the phone call to Carib News. And he had talked with them.

Q. Do you recall when that was?

A. No, I don't recall the exact date or time.

Q. Was it before these emails?

A. It was before I talked with them.

Q. So it was actually before the phone call that she is referring to in the first email?

A. It was before I spoke with them. Yes.

Q. The first call where she is talking about in the very first email, it was before that?

A. It was before I ever spoke with them. Correct.¹⁷⁹

¹⁷⁷ See Exhibit 33.

¹⁷⁸ Mobley December 15, 2009, Tr. at 11–12.

¹⁷⁹ *Id.* at 15–17.

Ms. Mobley told the Subcommittee that she had spoken with Ms. Louis on several occasions, but that she had never spoken with Karl or Faye Rodney.¹⁸⁰ She stated she had asked Ms. Louis several times if there was someone else she could discuss the trip with and was not put in contact with anyone else:

Q. Do you recall any conference calls that you held with Karl, Faye Rodney, and Patricia Louis, and you and Susan?

A. No.

Mr. Butterfield. That was precisely the question. Throughout this whole process, did you ever have any contact with Karl or Faye Rodney either by email or by telephone?

The Witness. No. And the reason I can say that is because I asked Ms. Louis if she would put us in contact with someone else. Ms. Louis was—for the record, I don't think we said this at all. Ms. Louis in the email says, "It's the first time I have done this. I really don't understand what I am doing." When I shared the rules with her, she had never worked on these travels herself.¹⁸¹

Ms. Olson told the Subcommittee staff that she was unaware of any communication between Ms. Mobley and Ms. Louis after the initial email, and a phone call Ms. Mobley referenced in an email sent to Ms. Olson and Mr. O'Reilly.¹⁸² Ms. Olson did not know that Ms. Mobley had sent the internal email she wrote to Ms. Louis nor did she ever suggest to Ms. Louis that the corporations were "participants" and not "sponsors."¹⁸³ Ms. Olson was unaware that American Airlines provided the tickets used for the Members' transportation or that the Government of Antigua paid for the rooms.¹⁸⁴ Had she been aware of these two facts she would have required American Airlines and the Government of Antigua, at a minimum, to be identified as sponsors.¹⁸⁵ Ms. Olson added that the Government of Antigua's payment for the Members' lodging would have also raised FGDA reporting requirements.¹⁸⁶

(c) Interviews of Patricia Louis

Subcommittee counsel interviewed Patricia Louis on September 22, 2009. During the interview, Ms. Louis stated that she contacted Dawn Mobley in September 2007 because Representative Tubbs Jones told the Rodneys that the travel rules had changed and Ms. Mobley would be the Foundation's point of contact at the Standards Committee to assist with the pre-approval process.¹⁸⁷ She explained that the Foundation sent Representative Tubbs Jones a letter informing her of the upcoming 2007 conference, and Represent-

¹⁸⁰ *Id.* at 51.

¹⁸¹ *Id.*

¹⁸² Olson Tr. at 24. *See also* Olson Tr. at 52.

¹⁸³ *Id.* at 52.

¹⁸⁴ Subcommittee staff interview of Susan Olson, December 2, 2009.

¹⁸⁵ *Id.*

¹⁸⁶ *Id.*

¹⁸⁷ Subcommittee staff interview of Patricia Louis on September 22, 2009. Ms. Louis, through her attorney, would not consent to the interview being transcribed.

ative Tubbs Jones replied with a letter discussing the travel rules and identifying Ms. Mobley as the point of contact.¹⁸⁸

Ms. Louis is the executive assistant to both Karl and Faye Rodney at Carib News. She began working for them in 2005, after retiring from her position as a Foreign Service officer with the government of St. Lucia at its consulate in New York.¹⁸⁹ During her interview with Subcommittee staff, Ms. Louis explained that part of her duties is to work on projects associated with the Carib News Foundation.¹⁹⁰ She stated the Foundation holds workshops and other outreach programs each year, including a Mother-of-the-Year program.¹⁹¹ She further stated that the annual Multi-National Business Conference is the Foundation's biggest event and the only event for which the Foundation seeks contributions.¹⁹²

Ms. Louis said she does administrative work and was familiar with the solicitation letters sent by the Foundation to potential contributors to the 2007 and 2008 conferences.¹⁹³ She stated Mr. Rodney drafts the letters and she types them and mails them.¹⁹⁴ When asked why some solicitation letters contained a carbon copy (cc:) at the bottom with Representative Rangel's name, she stated that she was directed to send Representative Rangel a copy of those particular letters by Mr. Rodney.¹⁹⁵ She also said that if a name appeared as a "cc:", she would send that person a copy.¹⁹⁶

Ms. Louis was unfamiliar with any bank accounts for Carib News or the Foundation, but stated that if contributions were received, she would give the contributions to Mr. Rodney.¹⁹⁷ She also stated that any bills received for the conferences would also be provided to Mr. Rodney.¹⁹⁸

Ms. Louis stated that she filled out the initial Private Sponsor Travel Certification Form for 2007 that was sent to the Standards Committee containing the names of the corporations in question 12, as well as the subsequent form for 2007 on which only Carib News was listed in question 12.¹⁹⁹ Ms. Louis also acknowledged that she completed the sponsor form for the 2008 conference.²⁰⁰ She related that the information she used when typing the forms came from Mr. Rodney.²⁰¹ In addition, Ms. Louis indicated that she completed the post-travel memos for the 2007 and 2008 conferences that she emailed to the Members, and that the information she typed into the memos also came from Mr. Rodney.²⁰²

Ms. Louis did not recall why she continued to contact Ms. Mobley after she was told that Ms. Olson would be the counsel working on the trip.²⁰³ She added that Mr. Rodney would give her the language to use on the responses she sent to Ms. Olson.²⁰⁴ She told

¹⁸⁸ *Id.*

¹⁸⁹ *Id.*

¹⁹⁰ *Id.*

¹⁹¹ *Id.*

¹⁹² *Id.*

¹⁹³ *Id.*

¹⁹⁴ *Id.*

¹⁹⁵ *Id.*

¹⁹⁶ *Id.*

¹⁹⁷ *Id.*

¹⁹⁸ *Id.*

¹⁹⁹ *Id.*

²⁰⁰ *Id.*

²⁰¹ *Id.*

²⁰² *Id.*

²⁰³ *Id.*

²⁰⁴ *Id.*

the Subcommittee staff during the interview that no one told her to send the email that stated “the answer to your question is NO.”²⁰⁵ After her interview, Ms. Louis’ attorney sent a letter on her behalf that indicated she did not specifically recall anyone telling her how to respond, but that Ms. Louis discussed all of the emails with Mr. Rodney and that Mr. Rodney provided the language for her to use in her responses.²⁰⁶

On November 18, 2009, Ms. Louis appeared before the Subcommittee to provide sworn testimony. During her interview with the Subcommittee, Ms. Louis stated that among her responsibilities as Executive Assistant to Karl and Faye Rodney, she assists with the annual conference each year.²⁰⁷ She stated that she is responsible for arranging the travel of the Members and types the letters that go to the various participants or contributors.²⁰⁸ She told the Subcommittee that Mr. Rodney drafts the letters by hand and she types them:

Q. Now, when you talk about the letters, are you drafting and typing the letters?

A. No.

Q. What do you do?

A. I am typing.

Q. Okay. And where do you get the draft to type from?

A. Mr. Rodney.

Q. And does Mr. Rodney always write the draft?

A. Yes, he does.

Q. And does he do it by handwriting or transcription?

A. Hand.²⁰⁹

Ms. Louis also told the Subcommittee that she completed the travel forms that were provided to the invitees.²¹⁰ She explained that Mr. Rodney drafted the information that he wanted and then she typed the information on the forms.²¹¹ She also indicated that once she was told a Member or other VIP planned to attend, she helped arrange their transportation.²¹²

Ms. Louis told the Subcommittee that, prior to the 2007 conference, she was informed that new rules had been established that required new forms to be completed.²¹³ She was told that Dawn Mobley would assist the Foundation with completing the new forms:²¹⁴

Q. What occurred in 2007? Did anyone give you a name or instruct you that the rules have changed and you have to contact the committee?

Mr. Laufman. Are you asking her how she learned that—

Mr. Stoddard. No, I am asking her if anybody contacted you in any way and told you that because of the new rules

²⁰⁵ *Id.*

²⁰⁶ Letter from David Laufman, *see* Exhibit 34.

²⁰⁷ Louis November 18, 2009, Tr. at 7 and 15.

²⁰⁸ *Id.* at 15–17.

²⁰⁹ *Id.* at 16.

²¹⁰ *Id.* at 18.

²¹¹ *Id.* at 50.

²¹² *Id.* at 20.

²¹³ *Id.* at 21–22.

²¹⁴ *Id.*

that you are going to have to contact the committee to get preapproval for the 2007 conference travel.

The Witness. We sent the letter in, and the response came saying that there are new forms that have to be— that there are new rules that have to be completed.

BY MR. STODDARD:

Q. Do you recall any contact from Representative Tubbs Jones about the new rules and the conference?

A. There was a letter from her saying that she would assign somebody to work with us to—

Q. And do you remember who that person was that she assigned that she identified?

A. Kelly Mobley.

Q. Was it Dawn Kelly Mobley?

A. Yes. Dawn Kelly Mobley.²¹⁵

Ms. Louis also verified that she had received several emails from Ms. Olson regarding the corporate sponsors and would share the emails with Mr. Rodney, who would draft a response to Ms. Olson.²¹⁶ She recalled the one email exchange in which Ms. Olson asked if any of the corporations were paying for any of the expenses of the Members.²¹⁷ Ms. Louis told the Subcommittee that she forwarded Ms. Olson's email to Ms. Mobley and requested her advice because she had been dealing with Ms. Mobley on the trip.²¹⁸ She also stated that Mr. Rodney instructed her to send the email answering Ms. Olson's questions regarding the listed entities paying for any of the costs for the Members.²¹⁹ She was aware of the agreement with the Government of Antigua to pay for the lodging and meals of the Members as well as the use of the airline tickets donated by American Airlines for the transportation of the Members.²²⁰ She agreed that based on Ms. Olson's question asking whether any of the listed entities were paying for Members' costs, the answer should have been "yes" and not "no," but she was responding based on what she and Mr. Rodney believed the definition of "sponsor" was.²²¹ She also stated that she did not know if the government actually paid for the rooms:²²²

Q. I asked you before we broke—again, I'm sorry for dropping that ball. Before we broke, I asked you specifically in accordance with the email response to Ms. Olson about did any other of these entities pay for anything. And the one question I asked you is did anyone pay for the lodging costs, and wasn't it true that the Antigua Government agreed to pay for those lodging costs? Did you have a chance to reflect on that issue?

A. I don't know if they actually paid, but I sent the letter to the minister. And in the past some governments have not paid, so I don't know if Antigua did, in fact, pay because I don't—I didn't correspond with them. Mr. Rodney

²¹⁵ *Id.*

²¹⁶ *Id.* at 34–38.

²¹⁷ *Id.* at 27.

²¹⁸ *Id.* at 36.

²¹⁹ *Id.* at 49.

²²⁰ *Id.* at 47–48.

²²¹ *Id.*

²²² *Id.* at 48.

was the one who dealt with the Prime Minister or the minister, spoke with them. And if the checks came in or—I don't know.

Q. Now, you've been there for four years; is that right?

A. Right.

Q. So you were there for the 2005, 2006, 2007, 2008 conference?

A. Yes.

Q. And this year the 2009 conference?

A. Yeah.

Q. You say in the past some countries didn't pay. Was it standard practice for the foundation to make an agreement for the host country to pay for rooms for congressional travelers?

A. It's my understanding, because I wasn't there for the others, but—

Q. Now, you were there for the 2008 conference. Did St. Maarten's government agree to pay for congressional travelers, to the best of your recollection?

A. To the best of my recollection, yes.

Q. Okay.

A. As to if they did, I don't know.

Q. Okay. But you recall that they agreed that they were going to pay part of the cost. And that was for Members of Congress and anybody else?

A. VIPs.

Q. And who would be the VIPs?

A. I don't know. Former speakers, Dinkins, Mayor Dinkins, Harry Belafonte, the President of—

Q. Would the VIP also include the representative of the contributing corporation?

A. The representative of—

Q. Of a corporation, such as AT&T, that they were coming to speak to—

A. No, elected officials.

Q. So mostly elected officials and Harry Belafonte and celebrities?

A. The speakers and David Dinkins and—²²³

Ms. Louis also told the Subcommittee that she participated in a couple of telephone conferences with Ms. Mobley during which Karl and Faye Rodney also participated.²²⁴ One such conference included a discussion of the identification of the corporations as "participants."²²⁵

Q. This appears to be a fax to Dawn Kelly Mobley from you on October 11th, which I will show it to you and ask you if you recognize it. But basically it says, further to our conversation this morning recalling the travel certification form, the conference has paid for the Carib News Foundation. The companies are participants, are not sponsors or cosponsoring the partnership?

²²³ *Id.* at 54–55.

²²⁴ *Id.* at 53.

²²⁵ *Id.* at 58–59.

Can you look at that and see if you recognize that fax? Have you seen that fax?

A. Yes, I did.

Q. Have you seen that before?

A. Yes.

Q. Did you type that fax?

A. Yes, I did.

Q. Did anyone provide you with the text for you to type into that fax or provide you with a draft of what to say?

A. The draft, Mr. Rodney.

Q. And you indicate in that—in that fax that there was a conversation earlier that day. Do you recall who that conversation was with?

A. A conversation with Dawn Kelly Mobley.

Q. So you spoke to Dawn.

You indicate in that fax that the company—that the corporations we were talking about that contributed, that were previously identified sponsors, are actually participants?

A. Right.

Q. That's the first time we see the use of the word "participants" in any of the communications, in that fax. Did anyone tell you to use the word "participants" or call these companies participants to your recollection?

A. In the conversation, the conference call with the Rodneys, and Ms. Mobley, and Ms. Olson. And then we went over what the company—what the sponsors did, the planning of the conference by the sponsor. It was—the interpretation was that they were participating and not the sponsor, because the official sponsor was Carib News.

Q. And do you recall what Mr. Rodney or you or anybody on the Carib News side of the telephone conversation told Ms. Mobley as to what their participation was, which is why they reached the conclusion they were participants, not cosponsors? Do you remember that part of the conversation at all? I realize it was two years ago and you may not recall.

A. No.

Q. Do you remember what caused them to come up with the fact they were called—that they should be called participants?

A. [Nonverbal response.]

Q. Now, are you sure that Ms. Olson was—took part in that conversation?

A. I know there was a conference call, and Ms. Mobley was on it. Ms. Olson I am not sure, because this was two years ago.

Q. Right.

A. But I spoke with her because it says "our conversation."

Q. So it's possible that it was only with Ms. Mobley; is that right?

A. It was a conference call.

Q. Sure. But all—Mr. and Mrs. Rodney were both present; is that right?

A. Yes.²²⁶

Ms. Olson verified that she did not participate in any conference calls with Patricia Louis, Dawn Mobley and the Rodneys, but had spoken individually to Ms. Louis.²²⁷

Ms. Louis also verified that she was responsible for providing the Members who attended the trips with a memorandum containing the costs for their post-travel reports.²²⁸ She testified that Mr. Rodney would give her the draft of the memorandum and she would type it and send it to the Members.²²⁹ She did not know where the information on the draft came from.²³⁰ Ms. Louis also verified that she forwarded the charitable contribution form that was signed by Mr. Rodney to Verizon, one of the entities that donated money to the 2008 conference.²³¹ This form indicated that the conference registration and meals (not including lodging) was \$650.00 per person for the 2008 conference.²³²

Ms. Louis was asked if anyone instructed her to tell Ms. Olson that the corporations contributed to the general fund of the Foundation and not specifically to the conference.²³³ She responded that Mr. Rodney gave her that instruction:²³⁴

Q. Now, does the Carib News conference—or, I’m sorry, the Carib News Foundation receive contributions for other events during the year?

A. I don’t know. I’m not—the finances I’m not a part of, so I don’t know.

Q. Can you tell us who instructed you to tell Ms. Olson that the funds contributed by these corporations for the conference were contributed to the general fund of the foundation and not specifically for the conference?

A. Mr. Rodney gave me the information.²³⁵

(d) Subcommittee Interviews of Karl Rodney

Karl Rodney was interviewed by the Investigative Subcommittee on October 28, 2009, and again on December 1, 2009. Mr. Rodney is the publisher and CEO of Carib News, Inc.²³⁶ Mr. Rodney explained that at the time he began the publication he had no experience with publishing and is an economist by trade.²³⁷ Before starting Carib News, he worked for a life insurance company.²³⁸

Mr. Rodney also told the Subcommittee that he and his wife started Carib News Charities in 1988.²³⁹ The purpose of Carib News Charities was to “do what we saw as a community outreach activities [sic] that were not necessarily relevant to the publication itself; that we want to do within the community programs to encourage young people, programs to encourage mothers, programs

²²⁶ *Id.* at 58–60.

²²⁷ Subcommittee counsel follow-up question to Ms. Olson, December 2, 2009.

²²⁸ Louis November 18, 2009, Tr. at 67.

²²⁹ *Id.* at 67–68.

²³⁰ *Id.* at 67.

²³¹ See Exhibit 35.

²³² *Id.*

²³³ Louis Tr. at 91.

²³⁴ *Id.*

²³⁵ *Id.* at 91.

²³⁶ Karl Rodney October 28, 2009, Tr. at 11 and 34.

²³⁷ *Id.* at 10.

²³⁸ According to New York Department of State, Division of Corporations records, Carib News Inc. was incorporated on June 8, 1982. See Exhibit 5.

²³⁹ Karl Rodney October 28, 2009, Tr. at 10.

that we thought an immigrant community would be well served by.”²⁴⁰ He identified the officers of the Carib News Charities to the Subcommittee.²⁴¹ Michele Rodney, their daughter, is the President and he, Mrs. Rodney, Bernice Rodney, and Karlisa Rodney, also their daughters, are Directors of the Foundation.²⁴² Mr. Rodney told the Subcommittee that they re-designated Carib News Charities in 2006 as the Carib News Foundation because they wanted to do more with education and the word “foundation” was more in line with current “jargon.”²⁴³ Mr. Rodney did not know whether the Foundation was a public charity or private foundation and further related he did not know the tax law regarding private foundations or the limitations on a private foundation paying for a disqualified person’s travel expenses.²⁴⁴

Mr. Rodney told the Subcommittee that the Foundation does not have a budget for hosting events.²⁴⁵ When asked the total cost for the hosting the 2007 conference, Mr. Rodney answered that the 2007 conference cost approximately \$400,000 and the 2008 conference cost just a little over \$400,000.²⁴⁶ Mr. Rodney told the Subcommittee that the Foundation did not receive sufficient contributions to cover the entire cost of the conference so the balance was paid out of the Carib News newspaper’s operating budget, which he indicated was approximately \$1 million per year.²⁴⁷ Initially, Mr. Rodney stated that he had records showing the breakdown of costs for each conference and would provide them to the Subcommittee.²⁴⁸ Mr. Rodney revealed during his second interview on December 1, 2009, that he did not have the document that detailed the costs for the conferences, but that he constructed one for his attorney.²⁴⁹ His counsel argued that the document would be protected by attorney-client privilege and the Subcommittee agreed not to request that document, but did demand Mr. Rodney turn over any source documents he used to construct it.²⁵⁰ Mr. Rodney ultimately did not provide the records. Mr. Rodney’s counsel informed the Subcommittee that he did not believe the records existed.²⁵¹ Although subpoenaed to produce them, Mr. Rodney has never turned over any records detailing the Foundation’s or Carib News’s costs for either the 2007 or 2008 conference that he indicated he had.²⁵²

Mr. Rodney was unable to tell the Subcommittee how much of the costs for the 2007 conference were recovered from contributions and conference and lodging fees paid by the attendees.²⁵³ However, Mr. Rodney indicated that approximately \$160,000 was received in contributions from corporations in 2007 and approximately \$200,000 in 2008.²⁵⁴

²⁴⁰ *Id.* at 13.

²⁴¹ *Id.* at 19.

²⁴² *Id.*

²⁴³ *Id.* at 13. According to New York Department of State, Division of Corporations records, the Carib News Charities was renamed the Carib News Foundation in 2001. See Exhibit 6.

²⁴⁴ Karl Rodney October 28, 2009, Tr. at 14–15.

²⁴⁵ *Id.* at 21.

²⁴⁶ *Id.* at 21–22 and 35.

²⁴⁷ *Id.* at 21–22.

²⁴⁸ *Id.* at 22.

²⁴⁹ Karl Rodney December 1, 2009, Tr. at 46–50.

²⁵⁰ *Id.* at 50 and 145.

²⁵¹ Committee counsel telephone conversation with David Laufman on December 7, 2009.

²⁵² Karl Rodney October 28, 2009, Tr. at 22.

²⁵³ Karl Rodney December 1, 2009, Tr. at 23.

²⁵⁴ Karl Rodney October 28, 2009, Tr. at 25.

Mr. Rodney confirmed that each year he solicited contributions specifically for the conference from various corporations he had dealt with before.²⁵⁵ Mr. Rodney verified that he drafted the letters to the various corporations soliciting the contributions.²⁵⁶

When asked why he had indicated a carbon copy should go to Representative Rangel and other Members of Congress on two of the letters, he indicated it was for informational purposes because he knew they had an interest in those issues, such as transportation to the Caribbean.²⁵⁷ Representative Rangel's name appeared on a letter to AT&T that solicited AT&T to become a sponsor for the 2007 conference.²⁵⁸

Q. I'm going to show you what I've marked as Exhibit KR-1. It is a letter dated April 23, 2007. Sir, have you had a chance to review that document?

A. Yes.

Q. Do you recognize that document?

A. Yes.

Q. What is that document, sir?

A. It is a letter to Marie Long at AT&T Foundation soliciting support for the conference.

Q. For which conference was this soliciting support?

A. The 2007 conference.

Q. Can you tell the Subcommittee who sent this letter? First of all, who signed this letter?

A. That is my signature.

Q. Did you review this letter prior to signing it?

A. I think I did.

Q. Is this the language that you approved of to go to Ms. Long?

A. Yes, it appears that way.

Q. Okay. And I want to put your attention to the second page of the letter at the bottom. Do you see where it says—has a carbon copy indication there? Can you tell us whose name appears for a carbon copy?

A. Congressman Charles Rangel.

Q. Can you please tell the Subcommittee for what purpose does Mr. Rangel's name appear at the bottom for receiving a copy of this letter to AT&T?

A. Well, Mr. Rangel through the years has been very supportive of the—(interrupted by Mr. Rodney's counsel).²⁵⁹

After a conversation with Mr. Rodney's counsel regarding the topics of the inquiry, Representative Miller also asked why Mr. Rodney sent a copy of the letter to Representative Rangel:

Mr. Miller. Why did you think Mr. Rangel would be interested? You say you sent him this letter for his information?

The Witness. As I mentioned in my response to counsel that Mr. Rangel has always had an interest in the con-

²⁵⁵ *Id.* at 25–26.

²⁵⁶ *Id.* at 26–27.

²⁵⁷ *Id.*

²⁵⁸ See Exhibit 36.

²⁵⁹ Karl Rodney October 28, 2009, Tr. at 26–27.

ference, and through the years we worked with his staff as we have gone through the planning of the conference. We sent it to him strictly for his information. He didn't instruct us to. We didn't ask him to. We sent it strictly as information.²⁶⁰

Representative Rangel's name, along with other Members of Congress who did not attend the conference, also appeared on the letter soliciting airline tickets from American Airlines for the 2007 conference.²⁶¹ Mr. Rodney was questioned regarding this letter as well:

Q. Now, I have handed you, as I have said, 2, 3 and 4, and KR-1 actually had a "cc" to Congressman Rangel. If you look at KR-2, there are additional cc's. There is Congressman Rangel, Congressman Meeks, Congresswoman Eddie Bernice Johnson, and Congresswoman McMorris. And this letter was written the same day, and it was sent to American Airlines.

Can you tell the committee, if you know, why you included more than just Mr. Rangel or included the other parties on this particular letter?

A. On this particular letter, this addresses the issues of tourism and travel in the region. Congressman Meek has had several conferences, particularly displayed particular interest in that subject, travel and tourism, and he had his own interest in that. Congress Member Eddie Bernice Johnson, again, she was interested in transportation. So it was all information that we sent out.

Q. What you were sending them was a letter where you're requesting American Airlines to donate tickets for the 2007 conference?

A. To participate in the conference.

Q. Aren't you asking them on the second page to donate tickets?

A. As part of our sponsor, the sponsor package, we asked American Airlines to provide Carib News with X number of tickets.

Q. And in this case you were asking for 50 coach tickets round trip, 35 first-class round trip, 35 coach tickets for the purpose of the site and inspection and planning; is that correct?

A. That is correct.

Q. And again, I'll ask you why was it important in your mind for Carib News to notify Members of Congress who had an interest in transportation that you were asking an airline for free tickets?

A. We're writing a company to participate in the conference, and the company—in a particular area of interest. American Airlines is critical to the Caribbean, and so we are writing them for their participation, which we had several years.

The Members have a particular interest in the area that American Airlines participates, travel and tourism, and it

²⁶⁰ *Id.* at 29-30.

²⁶¹ *See* Exhibit 37.

was informational. The Members didn't ask us to do it. They didn't ask us to do anything. As far as I know, they did nothing. It was strictly informational.

Q. All right. Thank you, sir.

Now, on letters that you wrote that we have identified as KR-3, KR-4 and KR-5, I note for the record that no Congress Member was included as a recipient of any of these letters. Is it your impression, based on your previous testimony, that those Members were not interested in technology for the region, or why would you not include them in those letters?

A. Would you repeat?

Q. On letters marked KR-3, KR-4 and KR-5, again written on April 23rd and subsequently April 30th, you did not include a copy, a carbon copy, to any Member of Congress. Can you tell the Subcommittee why you left those Members off of those letters if it was just informative? And obviously there is a technology component with IBM. There are bank issues. Why did you not feel it was necessary to send copies of those letters?

A. The vast majority of letters we send does not have carbon copy, and those two were two that we sent for informational purposes. We had no need or reason to send copies.²⁶²

The Subcommittee asked Mr. Rodney about the contract the Foundation had signed with Unique Vacations, Inc., for the 2007 conference.²⁶³ Mr. Rodney explained that Unique Vacations was the marketing company for Sandals Resort.²⁶⁴ He acknowledged meeting with Sandals Resort officials and negotiating the terms of the contract.²⁶⁵ He further acknowledged reviewing the contract before it was signed by Faye Rodney.²⁶⁶ He verified that Faye Rodney's signature appeared on the contract.²⁶⁷ Mr. Rodney verified the amounts for lodging on the contract were the amounts the Foundation agreed to pay.²⁶⁸ Mr. Rodney acknowledged the contract with Unique Vacations was signed on May 5, 2007.²⁶⁹ He did not know if the amounts were the actual amounts paid without seeing the final bill, but did not believe the amounts had changed.²⁷⁰

Mr. Rodney initially told the Subcommittee that the Foundation had its own checking account, but later discussed how contributions for the conference are deposited in the Carib News publications "projects" account, along with donations for other projects.²⁷¹ He was asked specifically about one of the checks written as a deposit to Unique Vacations:

Mr. Dent. Is that check from the foundation, or is that a check from the news organization? Is that from the newspaper or from the foundation?

²⁶² Karl Rodney October 28, 2009, Tr. at 35-38.

²⁶³ *Id.* at 38-39.

²⁶⁴ *Id.* at 38.

²⁶⁵ *Id.* at 43-44.

²⁶⁶ *Id.* at 40.

²⁶⁷ *Id.* at 40-41, 43-44.

²⁶⁸ *Id.* at 44.

²⁶⁹ *Id.* at 56.

²⁷⁰ *Id.* at 46.

²⁷¹ *Id.* at 55.

The Witness. That's newspaper.

Mr. Miller. What is project account?

The Witness. In the running of our business, our accountant decided to, our newspaper account where you have revenue from the newspaper, and then the same company, an account that is for when we have funds for projects, so you can manage or get a better sense as to which newspaper, which project. It is the same company, same ID. It is just he felt at that time it was one way to help us to manage.

Mr. Miller. And this was a separate bank account with Citibank?

The Witness. Separate bank account with the same bank?

Mr. Miller. And what projects were run through this account?

The Witness. Projects such as a conference, any project, any nonrelated—

Mr. Miller. To publishing.

The Witness. Right?

Mr. Miller. And were all of the funds for this conference run through the project account?

The Witness. To the best of my recollection, yes.

Mr. Dent. If the foundation was sponsoring the trip, why would the foundation not write the—why would not the check be drawn from the foundation as opposed to the newspaper?

The Witness. The foundation, as I tried to indicate, the foundation was something new that we were, the funds that were coming were coming into the newspaper. At times, you have to get from cash flow funds out to cover costs. But it was not that the news foundation had funds that it wasn't used for. It was really what is our—and the advice of our accountant, if the funds come into Carib News, it is in Carib news, and you account for it in that sense. And that is how we would have done it. And it had nothing to do with any foundation.²⁷²

Mr. Rodney further discussed how funds were deposited and handled:

Mr. Miller. You may have answered this already, but did you have a bank account for the foundation?

The Witness. Yes.

Mr. Miller. What sorts of—what did you pay out of that account?

The Witness. We pay out of that account, funds that were in that account, any expenses that could be related to the conference that we were undertaking.

Mr. Miller. Say that again?

The Witness. We paid out of that account when funds were available any expense that are conference related.

Mr. Miller. Out of the foundation?

The Witness. Right.

²⁷² *Id.* at 54–56.

Mr. Miller. There was another foundation account, in addition to this project account that was also a foundation account?

The Witness. That's correct. The project is the main company, the same ID, same accountant, and all that comes together as one.

Mr. Miller. And on what bank was the foundation account?

The Witness. At Citibank. All the accounts had been in one bank, Citibank.

BY MR. STODDARD:

Q. Now, you indicated that if a check came in written to Carib News and it was for the conference, it would be put in the Carib News project account; is that correct?

A. That is usually, yeah.

Q. And what other funds were deposited into the Carib News project account?

A. My recollection is that project funds were deposited in project accounts.

Q. So there were no funds other than funds that were contributed for the conference, no other funds were deposited?

A. Oh, no, we have other funds that are not contribution. They are project related.

Q. And what kind of—where would those funds come from?

A. They would come from individuals who contribute to a particular project that we have under our management.²⁷³

Mr. Rodney also confirmed that when a corporation agreed to contribute to the conference, he would send them an invoice.²⁷⁴ The invoice would clearly indicate that it was for payment of the agreed upon contribution specifically for the conference and not the general fund of the foundation:

Q. And in fact, in the description of the invoice, the language appears, sponsor for the 12th annual Caribbean Multi-National Business Conference, is that correct?

A. That is correct.

Q. And do you know who typed that into the invoice?

A. The bookkeeper.

Q. And would anyone tell the bookkeeper to use that language to identify the purpose as a sponsor for the 12th annual conference?

A. My sense is that is the traditional way we have always done it.²⁷⁵

Mr. Rodney was asked about his communications with the Standards Committee before the 2007 conference and the new travel rules that went into effect that would change the manner in which the Foundation invited Members to attend.²⁷⁶ He indicated that he

²⁷³ *Id.* at 57–58.

²⁷⁴ *Id.* at 58.

²⁷⁵ *Id.*

²⁷⁶ *Id.* at 61.

had been in contact with the Standards Committee's former Chair, Representative Stephanie Tubbs Jones, before the conference and she indicated to him that the travel rules had changed and she assigned her designated counsel to communicate with the Foundation.²⁷⁷ Representative Tubbs Jones told Mr. Rodney that Dawn Kelly Mobley would assist the Foundation with understanding the new rules and processing the trip request.²⁷⁸

Mr. Rodney verified an email sent on September 17, 2007, was sent from carib—desk@att.net, which he indicated is an email address used by both Carib News and the Foundation.²⁷⁹ He reviewed the draft agenda that was attached to the email and verified it was the draft agenda for the 2007 conference.²⁸⁰ He further verified the email and agenda was sent to George Dalley and Shelley Thomas.²⁸¹ Mr. Rodney was asked about the agenda and the fact that it identified sponsors for various events:

Q. I'm going to show you a—my next exhibit is KR-8, and this is in tab 8. And it is an email that was sent from carib—desk@att.net. Who, what email is Carib—desk@att.net?

A. That's an email address that we use.

Q. Is that for the newspaper or the foundation?

A. That is for the newspaper and foundation. We have no—

Q. And this is an e-mail sent to [Shelley Thomas] and George Dalley; Subject: Draft Agenda, 2007 Conference; Program Working Copy—edited Sept 13.doc; and the signature block at the bottom says Patricia Louis. And if you could look over that.

Mr. Dent. Which tab is that again? I'm sorry.

Mr. Stoddard. Eight.

Mr. Laufman. This is a multipage document.

Mr. Stoddard. That's correct. It's a cover mail, email with an attachment?

Mr. Laufman. Do you want him to look at all the documents now?

Mr. Stoddard. If you could. I expect that Mr. Rodney will recognize the documents that were attached.

The Witness. It appears to be a draft of one of our programs.

BY MR. STODDARD:

Q. Of the agenda for the 2007 conference, is that correct?

A. Yes.

Q. And did you instruct Ms. Louis to send a draft copy to Shelley Thomas and George Dalley?

A. I don't recall having done this specifically, but I would not be at all surprised if I did.

Q. And do you know why you would want George Dalley and Shelley Thomas to receive a copy of a draft agenda, a working copy?

²⁷⁷ *Id.*

²⁷⁸ *Id.*

²⁷⁹ *Id.* at 62.

²⁸⁰ *Id.* at 63.

²⁸¹ *Id.*

A. Shelley Thomas is staff to Donna Christensen. George Dalley is staff to Mr. Rangel. As I mentioned earlier, Donna Christensen represented the Virgin Islands, and this conference has been of particular interest to her, and so we worked very closely with her from time to time. The same thing is true of Mr. Dalley. I think it was informational, to tell them where we were, and as far as I know, that was the reason.

Q. Were you seeking any input from them as to the agenda?

A. We never do.

Q. So you just felt that you needed to send those two a draft agenda?

A. That's correct.

Q. Now, looking at that draft agenda, if you look at the very first page, you notice at the bottom of the page, you talk about an opening reception, from 6:30 to 7:30, where the venue was, and it says, "Sponsor: AT&T," is that correct?

A. Yes, sir.

Q. Okay, and so, AT&T at this point was identified as a sponsor of a particular event at your conference, is that correct?

A. This was September 17th, based on information we had, and I know where we are going with this in terms of issue of sponsor because I know it's key to why I'm here and—

Q. Let me help you with this, now prior to 2007 conference, you would have been able to identify these companies as sponsors; is that correct?

A. That is correct. And when we applied for permission from Ethics, we also in our initial application identified every one of these as sponsors. And this was, we were down to October now, when we are trying to make some kind of decision, and we had not previously had rulings as to the difference in sponsorship. So, when we get to the point of sponsors, and I know you gave me those letters, the sponsors, those letters went out May, April, we were not even in conversation with Ethics about approval.

When it came to the point that we were asked the questions, based on the form and the new requirement, we clearly pointed out; they said, based on our understanding and the old form, these were sponsors. We were then given and guided by a definition of Ethics staff that by the new definition, Carib News Foundation by definition of their rules is the sponsor. And as such, we didn't align our position as Carib News to match that definition.

It was what we were doing in general, organizing, having complete control of the program that we, they—the committee agreed, Carib News is your sponsor, and so that was when the issue of sponsors came up.

We were clearly guided by the staff. We were very diligent in seeking out this definition, and we made sure we had nothing to hide. These sponsors that you are putting

out and making reference to, they were identified by us in the document that we sent to Ethics.

Q. Sir, on the staff, you refer to the committee and to the committee staff as telling you the definition of sponsor, who was that person or persons who identified, who told you that those companies would not be sponsors?

A. Sir, it's Dawn Kelly—Mobley Kelly. She also, in instruction, had pointed out that you must have meaningful connection, instructions on the definition, and she reinforced that. In fact, sir, we were talking to three different people on the staff; Dawn Kelly Mobley, Susan Olson, Hilary Smith. We were talking to everybody who had an input, trying to sort where we were. We made every deliberate effort to comply with their definition. They were the expert in the field. We knew this was new; the chairman said to us, she had personally said to us, these are the people who will help you. We worked with them. We relied on them. And we had absolutely, absolutely no reason not to rely on and go by what they were saying.

So when you point to sponsors in a letter, we talk about sponsors in April and May, we hadn't even gotten close to those decisions by the counsel. When we had this draft program in December, as you point out, these are your sponsors, we had not come to the conclusion with Ethics staff the definition of sponsor and how it would guide anything we do.

Q. Now you just mentioned, sir, that Representative Tubbs Jones told you, these are the people you deal with, but isn't it true the only name she gave you was Dawn Kelly Mobley?

A. If I said "these," I correct myself. The only one she gave me. What I did say is that we were not only talking to Dawn, and I don't know how they interloop within the decision.²⁸²

Mr. Rodney told the Subcommittee that he relied on the guidance from the Standards Committee staff in filling out the travel forms for the 2007 conference and it was with their guidance that the Foundation did not identify the corporate contributors to the 2007 conference as sponsors.²⁸³ He stated that he had "diligently" worked to identify the sponsors under the "old definition of sponsors":

The Witness. No. My position is, sir, the Chairperson directed us to expect the guidance from Dawn Kelly Mobley. We were contacted by Susan Olson. We were contacted by Hilary Smith. They were all a part of, my understanding and then based on their—they're a part of the Ethics Committee, and all were interlooped in helping or directing or guiding us to make these decisions. So we were listening to three people in Ethics at one time, trying to sort out in their minds and in providing us with guidance around some critical issue that we now have come to face.

²⁸² *Id.* at 62–66.

²⁸³ *Id.* at 67.

And what I can tell you is, in terms of the timing and in terms of what happened and what I know and what we participated, is we diligently disclosed the Ethics and their staff all these persons that were supposedly sponsors in the old definition of sponsors. We—it was their problem to—if, because Carib News was sponsored by their definition, then Macy's, CitiBank and those other corporations could not be sponsors because they are an entirely different definition. And so there was, how do you handle these? It went back and forth.

I'm sure you have access to the reams of email going back and forth to try to determine, how do we come to this understanding? And you should know that we were very forthright. All the information we provided, at no point did we attempt to hide the new, who were contributors, who were sponsors, and we were clear, very clear, and very diligent as to how we provided information or we reacted to information and how we came to whatever decision and conclusions.²⁸⁴

After a recess requested by Mr. Rodney's attorney, Mr. Rodney told the Subcommittee that he recalled speaking with Susan Olson and that she reinforced the position that the Foundation would be the sponsor for the purposes of the trip and the corporate contributors would be listed as participants.²⁸⁵ He testified that he had conversations with Ms. Olson, which he claimed was supported by the emails, and that Ms. Olson decided the corporations would be participants.²⁸⁶

Q. Now I asked you earlier if you had ever spoken to Susan Olson. You don't recall speaking to her?

A. I recall speaking with her. Yes, I do.

Q. Do you recall her asking you any questions about the companies, Pfizer, Macy's, AT&T, Verizon, those companies and what their role with the conference was?

A. Yes.

Q. Now, what did she tell you, or what did you tell her as far as their role?

A. Their roles, as far as we—the issue was, with Susan, as best I can recall, is that it was reinforced that Carib News and Carib News Foundation, based on the facts, would be considered the sponsor. What label—

Q. Excuse me, you are saying Susan Olson reaffirmed that with you?

A. That is my recollection. The issue, and I think the emails will confirm that, the issue was, how do you now characterize those companies that we had originally listed on the form as sponsors and in the traditional pre-2007, how do you then characterize them? What is their label? And that was the issue going back and forth with Susan Olson. And the memos, the emails should—it was in those conference conversations that Susan Olson decided that the proper label for those non-sponsoring entities would be

²⁸⁴ *Id.* at 66–67.

²⁸⁵ *Id.* at 70–71.

²⁸⁶ *Id.*

“participants.” The email will confirm that Susan sent to us, these are participants, change the program so that it reflects participants, and it is fine. We changed the program that we were sending back and forth, listing those entities as participants. And that was where we left the—that was the decision that we were guided to eventually.

Q. And these emails that you were referring to, were they emails that were between you and someone on the committee, or the committee and Patricia Louis?

A. It was primarily between Patricia Louis and the Members of the committee. But we meet regularly in planning the conference.

Q. You say “we,” who do you mean, sir.

A. Patricia Louis, myself, and Mrs. Rodney, to go over all aspects of the planning, and so we are made aware of these issues, and we determine responses as we go along, and on phone calls when necessary.²⁸⁷

Mr. Rodney stressed during his testimony that there was confusion as to the definition of “sponsor.”²⁸⁸ He stated that prior to 2007 they had always identified the corporations who contributed to the conference as sponsors.²⁸⁹ In 2007, the rules had changed and he believed there was a different definition for “sponsor” that he received from Ms. Mobley and Ms. Olson.²⁹⁰ He further stated that based on their guidance, Carib News Foundation would be the only sponsor because the Foundation planned and organized the trip and none of the corporations were involved in the planning or organizing.²⁹¹ He was asked to verify emails that were initially received from Ms. Mobley to Ms. Louis:²⁹²

Q. Does he recall any conversation or email since he was involved in conversations and emails and he is aware of them—do you recall Patricia Louis’ response to Dawn Kelly Mobley as to who the sponsors were on September 18?

A. All right. I was aware of that.

Q. And so you understood that at that point you were identifying the sponsors of the trip as those individuals, is that correct?

A. We were identifying the sponsors of the trip in the traditional sense, which we want to be very clear on.

Q. Just as far as, there is nothing about traditional sense. It says, “these are my sponsors,” is that correct?

A. These are my sponsors as I understood it—

Q. And that’s all I’m asking.

A. Okay.

Q. Now the next email, which is right above that on the very first page, is a little broader. Can you read that to us? Put it on the record. Who is that email from?

A. Which is this, sir?

²⁸⁷ *Id.* at 70–72.

²⁸⁸ Subcommittee Interview of Karl Rodney on October 28, 2009 and December 1, 2009. See also Karl Rodney October 28, 2009, Tr. at 64–65.

²⁸⁹ Karl Rodney October 28, 2009, Tr. at 64.

²⁹⁰ *Id.* at 71.

²⁹¹ *Id.* at 70–71.

²⁹² *Id.* at 72–74.

Q. It is the lot of text spot in the middle. It is right above with Patricia Louis responds with, “these are our sponsors.”

Mr. Laufman. What are you asking?

BY MR. STODDARD:

Q. Read that email. Who it is from, and who is it to?

A. From Kelly Mobley.

Q. And to?

A. To P. Louis.

Q. And what date?

A. September 19th.

Q. And what is the text of that email?

A. I understand that several of these will take part in sponsoring food and other parts of the Antigua travel. However, I need clarification on the official sponsor, that organization providing travel, lodging, and organizing trip. Am I to assume it is Carib News? The official sponsoring organization must not retain, employ a registered lobbyist or a registered foreign agent. And the sponsor must have a direct and immediate relationship with the event or location being visited. To assist with this, I’m scanning information, guidelines, emails in just a moment. Please provide a fax number if method of submittal will be more helpful. If there is someone handling this matter, please provide me their direct contact information, as I must ensure adherence to these new guidelines for travel. In any event, I do not need to know who the official sponsor will be, I will assign a staff attorney to review your documents and remain in contact with you until this matter is finalized. Please respond today or tomorrow at the latest. I will be traveling for a while thereafter and must ensure my staff attorney has all the necessary information for a safe review.²⁹³

Mr. Rodney continued to explain that he had identified the sponsors to the 2007 conference as they had in the past, but “the Committee” told him that these corporations could not be listed as sponsors but had to be listed as participants.²⁹⁴ On December 1, 2009, during the continuation of his testimony before the Subcommittee, Mr. Rodney again stressed that he reported the corporations as sponsors, but was told by “the Committee” that under the rules those corporations could not be sponsors and they would have to be changed to “participants.”²⁹⁵ When asked who on the Standards Committee told him this, he was unable to identify the individual.²⁹⁶ He argued that this information was in the email sent from Susan Olson that instructed them to change the identification from sponsor to participant.²⁹⁷ The Subcommittee asked Mr. Rodney to verify he had seen the emails from Susan Olson regarding the sponsor issue, as well as the emails sent between Pa-

²⁹³ *Id.* at 73–74.

²⁹⁴ *Id.* at 119.

²⁹⁵ Karl Rodney December 1, 2009, Tr. at 6.

²⁹⁶ *Id.* at 81–82.

²⁹⁷ *Id.* at 77.

tricia Louis and Dawn Mobley.²⁹⁸ After he indicated that he was familiar with the emails, the emails and the responses from Patricia Louis were discussed and Mr. Rodney was asked questions regarding the emails and his interpretation of what Ms. Olson was asking.²⁹⁹ However, Mr. Rodney would not directly answer any of the questions regarding this issue:

Q. Okay. Now, you said that you only responded, you only listed—eliminated these corporations and the government as sponsors because you were directed to do so by someone on the committee. They were no longer sponsors. Someone here told you that. But from Ms. Olson's email she clearly didn't say that in this email. Would you agree?

A. What email?

Q. In the email you have right in front of you. There is nothing in here that says these aren't sponsors. In fact, she is asking what is their role. They were sponsors last year. Clarify their role. And this was on October 10th, right?

Mr. Laufman. What is the pending question?

BY MR. STODDARD:

Q. The pending question is, is it clear from this email that she did not say these people are not sponsors? In fact, wanted to know what their role was, because the previous year they were sponsors—from the advice of the committee. The committee said “These are sponsors, they have to be listed,” the year before. She provided that.

So is it clear to you on this email that she still thinks they are sponsors; and, in fact, is saying they are still sponsors, please advise as to what their role is?

A. I am not clear as to the internal—

Q. I am only asking you about this email and what your conclusion is from it. She is telling you in this email—she is asking what their role is, and she is saying because last year when you asked us this question, our advice said they were sponsors and should be listed because they are underwriting some of the costs.

Is it clear to you from her email here that those corporations still need to be sponsors until you clarify their further role?

A. My answer is we were getting—we have three people in the Ethics Committee that we are dealing with. And I am sure you have emails to the effect from the same Susan Olson that says, Change those names from sponsors.

[Interruption by Mr. Rodney's counsel] . . .

Q. I am asking you here, does that email indicate from Susan Olson that those corporations are not sponsors?

[Interruption by Mr. Rodney's counsel] . . .

A. You need to be fair. And you have information in here that would suggest that Susan Olson, the same Susan Olson says to me these people have to be listed as partici-

²⁹⁸ *Id.* at 75–98.

²⁹⁹ *Id.*

pants. And I don't see why it is coming back here when you have email to the effect—I mean I don't.

Q. We will get to that email, I guarantee you. But right now I am asking you, on October 10th, did Susan Olson indicate to you in that email that those corporations were not sponsors?

A. It certainly is in conflict with everything that they have told us before that they were sponsors; which is your definition, not mine. And to my thinking, and to answer your—in my mind, we were designating the sponsors. But based on the committee's own definition, they could not be sponsors because none of these are providing a value, doing the content, determining the operation. So my understanding is that they could not be sponsors based on all we have had before.

And so to your question as to whether or not Susan Olson—for me, the definitive action is when we have gone through this and it comes back to us, they couldn't be sponsors, they need to be participants.

Q. Sir, you stated over and over that Ms. Olson told you that they weren't sponsors. I am asking you specifically about this email. And you are saying that all the advice they gave you was they weren't sponsors. Here she is actually saying that they are sponsors, please advise as to their role. Is that not what her email indicates to you?

From this email can you determine if at this point in time—we are not talking about later, at this point in time—did Ms. Olson still believe these corporations to be sponsors?

A. Sir, on the private sponsors form where it says sponsors, the definition of sponsors is there. That does not fit this.

Q. Can you just answer the question about that email? That is all I am asking you. In that email, she says: According to the committee's advisory opinion dated October 27th, 2006, provided that all the organizations that provided financial underwriting for the trip, along with the Foundation, were required to be listed as the trip sponsors.

That is a pretty clear definition—if they provided financial underwriting for the Foundation, along with the Foundation. At this point from her email, was Ms. Olson telling you these companies were not sponsors?

A. But you would agree with me that this is in total conflict with advice I have gotten from the same committee earlier with respect to the definition of sponsors. Because I want to be clear in my head what I am being asked.

Q. You are being asked, according to Susan Olson on October 10th with this email, that she still considered those companies and was telling you these companies are sponsors.

[Interruption by Mr. Rodney's counsel] . . .

Q. The question is, based on this email, was it clear or did Susan Olson still not understand whether or not those corporations were sponsors? Was that your interpretation

of her email, that she is asking you to provide additional information to verify what the role of these companies is?

A. All right. Based on this, she is asking for additional information.

Q. To verify what the role of these companies is?

A. Yes.

Q. And so at this point she did not say they weren't sponsors. She is asking what they were; isn't that right? At this point?

A. At this point. But it just goes back to my recollection that the definition of sponsors was made, counsel, prior to this, prior to October 10th.

Q. But that was not by Susan Olson, was it?

A. It was a Member of the Ethics Committee that we were dealing with.

Q. And who was that?

A. My recollection is it might have been Dawn Mobley.

Q. And the reason I am asking these questions is before you said Susan Olson told you this. And at this point she is asking you a specific question: What are the roles of these companies? I don't know what they are. We said they were sponsors last year because they helped pay. So what is the role?

In fact, she sends another email. After that response that I read earlier that they contribute to the overall function, she sent another email. And this email was sent on October 12th to Ms. Louis that says, please explain in more detail your email message below relative to the "sponsors contribute to the overall expense of the trip." In this regard, do the following entities pay for any of the expenses of the trip for the invited House Members? And she lists the Antigua Government and Sandals and Royal Caribbean Bakery, et cetera, Citibank. She lists all those companies that are on that email. And she says, do they pay for any of the expenses of the trip including round-trip air transportation? That is one of them.

Now, at that time she was asking specifically if any of those companies—American Airlines is listed—paid for any of the expenses for round-trip air transportation. Is that correct? Do you recall seeing that email?

A. Yes.

Q. And did in fact a corporation pay for air transportation? This is on October 12th. This is before the trip. This is what your understanding was, who was getting what. This is before even the issue with the Antigua Government came up. This is back in early October. Did any corporation, any of those corporations listed, pay for round-trip air transportation—or were going to pay for air transportation?

A. No corporation paid for any round trip.

Q. Did American Airlines provide tickets?

A. Not on October 12th and not for any Members.

Q. Did you ask if American Airlines would provide you with tickets and they said they were providing tickets?

A. You want me to answer you now as to American Airlines? American Airlines has a barter agreement with Carib News over the years where we have an agreement we barter tickets for their participation in the conference. They get—we have an arrangement, we have an agreement. There is consideration for the tickets we get from American Airlines. Allow me to—because these tickets are not earmarked for Members. They are not given to us to give to Members. We can do with them as we see fit. We can sell those tickets. This has been a tradition with American Airlines through the years.

There was no intent on our part to use—to use any tickets in violation of any rules. In fact, you should have in your documentation a memorandum from Ms. Louis to American Airlines and to Donna, to say we do not want to be in violation of any regulation. And counsel, if you allow me to—

Q. No, I am not going to allow you. That is more than the question.

[Interruption by Mr. Rodney's counsel] . . .

Mr. Stoddard. I am asking, on October 12th did you have an agreement with American Airlines to provide airline tickets?

A. Not for Members.

Q. Can I finish the question? To Carib News.

[Interruption by Mr. Rodney's counsel] . . .

Q. Did American Airlines agree to provide Carib News with 25 tickets for the 2007 conference?

A. I am not even clear what date that happened. I would have to check my records.

Q. And were tickets that were provided by American Airlines eventually used for congressional Members?

A. Tickets were used.

Q. Were tickets that were provided by American Airlines used?

A. Tickets that were used at our discretion. Counsel, it comes to the heart of what you are trying to—that we had some intention of—there is no motivation for us to be using American Airlines tickets to pay for Members. We are talking about \$2,000.

Counsel, go back and do your arithmetic and you will see those tickets that are used for American Airlines. Why would we jeopardize a relationship for \$2,000 with American Airlines? Our relationship with American Airlines went back 12 years, and we have that agreement. It is not anything we concocted for Members or anything concocted to deceive or mislead. Counsel, we have no motivation for that. Absolutely none. And I know it is to the heart of the issue. And I want to have you understand our position, that we consider American Airlines to have a contract. We gave them value for it, tremendous value. We could do with those tickets what we feel like, and we are not using that to get around any regulations in Congress.

Q. Mr. Rodney, did American Airlines provide tickets for the 2007 conference?

A. Yes, sir.

Q. And were any of those tickets used for any Members of Congress' travel?

A. Yes.

Q. Thank you. On October 12th when this email was asked, she also asked, did any of the following Members pay for lodging costs? And at this point you had an agreement with the Government of Antigua to pay for Members' lodging costs. Isn't that true? Is that true or not?

A. No.

Q. That is not true? Okay. Thank you. We will move on.

[Subcommittee recess and discussion]

Q. But you indicate that that was after it was all worked out and Ms. Olson had said change these participants, which was later in the month. And I'll get to that email later. But on October 12th before that point on this email it seems that Ms. Olson is still trying to figure out what their role is as sponsors. So we can infer from this email, and if you disagree with me please tell me that, that at this particular point when she sent this email on October 12th, she was still trying to determine are these entities sponsors or not. She's asking are they paying for anything, is that right?

A. That is right. Counsel, remember that prior to this, though, we had settled on what action what the sponsor would be.

Q. In fact from that email Ms. Louis on October 15th responded. So on the 12th which was Friday at 2:41 p.m. Ms. Olson sent that email and said I'm still confused, based on your response what's their role, do they pay for any of these things, at that point you would have known that American Airlines was paying for some of the tickets, however they were going to be used, or that the Antigua Government had agreed at that point to pay for lodging, and should they have based on just this email, before you get further into the sponsor and participant issue, should the response then been, well, yeah, they could be sponsors, they are paying for that. Do you know why that was not provided or why the response—let me tell you what the response was. On October 15th—well, before I get that, did you discuss Ms. Olson's email, this October 12th email, with anyone else on the committee or with Mr. Dalley or Ms. Thomas before sending a reply on Monday the 15th?

A. I don't recall having that conversation.

Q. On the 15th at 10:00 in the morning there was a response sent from Ms. Louis to Ms. Olson that said in response to your email the answer to your question is no regarding this thing. In other words, the response is, no, none of these people pay for anything. But we know that they did. Should that actually have been, well, yes, they do but that's all they do?

A. No, no, no, I'm very clear on that.

Q. Okay.

A. On that it was our understanding that once we decided to be sponsors none of these could pay, not that they would pay or should pay or might have paid, none could pay. And that's when the answer to it was if this is the definition that we are the sponsor then these sponsors, participants, could not pay. And as we said, we were very clear in our understanding no, because the definition that we are the sponsors we are to take up the Members' costs and therefore no. Working from that we then put that into effect that these Members, these companies were participants and that we would take it on. And that was our intention.

Q. Okay. So that was on October 15th. But subsequently American Airlines tickets were actually given to Members, that Carib News didn't pay for those tickets, that they were actually given those free tickets from American Airlines, isn't that right?

A. You want to shorten this. We have gone through this before. We explained to you American Airlines—

Q. I understand that.

A. We did that.

Q. Right. But what I'm saying is you just said that at this point on October 15th you knew at that point that none of these companies could pay. And so that's why the answer was no, they didn't pay for costs, lodging costs, they did not pay for meal costs?

A. Or they will not be paying.

Q. Fine. And I accept that. But in fact after October 15th American Airlines donated free tickets that had zero amount on them because they were donated tickets, they were promotional tickets from American Airlines, were actually given for Members. So I guess the confusion I have from your answer is that you knew that they couldn't pay, but in fact those tickets because they were given to congressional Members rather than you charging the tickets to a Carib News credit card or something, that you in fact did pay or allow American Airlines through the tickets they donated to the Carib News to pay for that transportation. Isn't that a fair assessment?

A. Would you like my assessment now?

Q. Yes.

A. And I thought we had done this prior to the break. That we consider American Airlines to be a participant with gaining benefits. American Airlines not only has a speaking opportunity, American Airlines had the worst public relation[s] record in the Caribbean. And it was through this conference and their participation that they rehabilitate their image and they said it over and over. So American Airlines wasn't giving us anything. American Airlines, we had an agreement with them. They were our tickets. Counsel, we could have sold those tickets and paid for the Members. It was a clear understanding that these tickets were not earmarked for Members, we did not, we were not deliberately—because again I have to take you back to the memorandum from Patricia Louis to Donna at

American Airlines. It specifically said I do not want to be in violation of any rules and regulations. Why would we be saying that? Because it's clear in her mind that there is no intent, there is no motivation to be using that. And in fact American Airlines must have had the same interpretation and their counsel. We did not have counsel. We were doing the interpretation as guided by the Ethics Committee.

So in terms of American Airlines, again, let us look at the proportionality. You are talking about \$2,000. Why would we as a company endanger or even try to deceive Congress or provide false information for \$2,000? Counsel, there has to have some proportionality to it. I mean there is no motivation to do that because we can't afford that. I mean there is no enrichment on our part. And we tried to be as clear as we can, as honest as we can, that we were not using American Airlines tickets to deceive Members.

Mr. Laufman. Let him ask his next question.

The Witness. I'm sorry.

BY MR. STODDARD:

Q. I mentioned earlier that Ms. Olson sent an email internal to this committee to Bill O'Reilly and Donna [sic] Kelly Mobley talking about your response. Bill and Dawn, please note the following response to Ms. Louis at Carib News. The portion appears that if each sponsor contributes funding directly to the trip and did not—and earmarked the funds and not simply to the general funds at Carib News, then the assumption is that all of these entities are cosponsors of the trip for purposes of the House travel rules. If that is the case it is likely that at least one of these cosponsors hired—retained a federally registered lobbyist the trip can only be a one day event trip. Thus the committee can't approve the trip as it currently exists. This was on October 12, 2007, at 9:29, on a Friday. This is before she sent the email asking for the additional clarification. She's saying basically here that if they contribute to the trip and not to the general fund of the Carib News that they must be listed as cosponsors. That's her interpretation on October 12th.

Now, Ms. Mobley sent you this internal email. Do you recall reading it?

A. What email?

Mr. Laufman. Can you show him.

BY MR. STODDARD:

Q. I'll show you. It's the one at the very bottom.

A. I remember seeing this memo.

Q. And so Ms. Mobley sent that to you and said here's the issue Susan is raising. So that memo clearly makes the case that if they contribute to the conference they have to be cosponsors. Is there anything that you didn't understand about that issue?

A. I didn't know and I don't recall the category of cosponsors in the private form. I know the category of sponsors and the responsibility of the sponsors. And this is a—again, gentlemen, we are getting three different voices

from Ethics. We're really not counsel, we're not professional. We are a simple group trying to get an approval. We had no expertise in the matter. We're being followed by the guidance. As you go through emails back and forth, and I don't know what internals are, we try to go by what we have been advised. At this point in time she's raising a question. As a counsel I wouldn't know because I don't remember the cosponsors. I know what we were defined as and our responsibility. So that is my understanding that we go back and forth.

Q. You indicated that you relied on the committee's definition of sponsor and what those corporations were. But that email clearly shows that Ms. Olson, the counsel who was handling the review, believed at that point that because the companies, the corporations contributed to the conference and not the general fund they would have to be listed as sponsors. Now, is that true, the corporations, that corporations did in fact contribute for the purpose of the conference, right, not to the general fund?

A. This is Ms. Olson's interpretation.

Q. Ms. Olson's opinion as counsel to this committee whether they should be sponsors. Did the corporations contribute to the general fund of the Foundation or to the conference specifically? And I know we've already asked that question, but I just want to clear it up.

A. These foundations—the participants contributed to the general fund of the conference.

Q. Of the conference and not to the general fund of the Foundation?

A. Conference, and to the extent that the Foundation is the sponsor of the Foundation also.

Q. But for their contributions it was invoiced and specifically to be paid for the 2007 conference, isn't that true? You invoiced each one of those corporations for the conference, they paid you for the conference? And American Airlines gave you tickets that only could be used for the conference?

A. No, that's not true.

Q. Well, I will tell you, sir—I don't want you to say that's not true. But I did in fact interview American Airlines and they said that they specifically stated that you have to use it for the conference. You are right that you could use them for any purpose, but they could only be used for the conference. That was the restriction they placed on those. In fact Ms. Louis attempted to use some of the unused tickets for another event and American Airlines said no, you cannot do that. So I don't want you to say anything that's not true. I want you to say that I know that American Airlines only contributed to the conference as did the other corporations. Based on that knowledge and reading Ms. Olson's email would you not based on your reading of the email believe that at that point those companies were sponsors?

And it doesn't mean that you couldn't hold a conference. I want to make that point. It's just saying if they were

sponsors then it's limited to a one day event. But based on Ms. Olson saying, hey, if they contribute only to the conference then they have to be sponsors. Isn't that your understanding of her email?

Mr. Laufman. Are you asking what his understanding is reading it now or what it meant at the time?

Mr. Stoddard. Well, now. He said he read it before and your interpretation shouldn't have changed. If you received that email back in 2007, from that email she's basically saying if they contributed to the conference and not the general fund of the Foundation they're sponsors. Isn't that really what she's saying?

The Witness. Clearly you understand that's in conflict with what was our understanding.

BY MR. STODDARD:

Q. I understand that. I'm just asking what's your interpretation of what she said?

A. That's her interpretation, one voice in the Committee of Ethics with another interpretation with another Committee of Ethics. You know, we were looking for a simple answer.³⁰⁰

At the beginning of his second interview, Mr. Rodney asked to address the issue regarding the Government of Antigua agreeing to pay for the lodging and meals used by Members during the 2007 conference.³⁰¹ Mr. Rodney explained that the Foundation always signs a basic agreement with the host country for each year's conference that required the host country to pay for lodging of Members and some VIPs.³⁰² During his first interview on October 28, 2009, Mr. Rodney told the Subcommittee that the Foundation paid for the rooms and did not acknowledge the agreement with the Government of Antigua until it was shown to him.³⁰³ At that point, he stated he did not know if the Government of Antigua actually paid.³⁰⁴ During his second interview, Mr. Rodney stated he had reviewed the matter and determined that once he learned from the Standards Committee that the other corporations could not be sponsors or pay for the Members' travel, he notified the Government of Antigua and advised them they would not be paying for the lodging of the Members.³⁰⁵ He did not recall who he spoke to in Antigua, nor did he provide any record of this communication:³⁰⁶

The Witness. Thanks very much.

I would like to supplement my previous testimony regarding the 2007 conference in Antigua. At my deposition on October 28th I said at that time I wasn't sure whether the Government of Antigua had made a payment for the conference. After reviewing the matter further, I confirmed the Government of Antigua did in fact make a payment of \$31,500 to Sandals Resort in connection with a conference there. To the best of my knowledge, that payment occurred

³⁰⁰ Karl Rodney December 1, 2009, Tr. at 75-98.

³⁰¹ *Id.* at 4.

³⁰² *Id.* at 3-5.

³⁰³ Karl Rodney October 28, 2009, Tr. at 102-103.

³⁰⁴ *Id.*

³⁰⁵ Karl Rodney December 1, 2009, Tr. at 4-5.

³⁰⁶ *Id.* at 39-40.

or was made on or about October 31, 2007, as shown in a November 28, 2007, statement from Unique Vacations for which we have provided this committee.

But, contrary to what is indicated in the terms of the basic agreement with the Government of Antigua, that payment did not go towards the cost of Members' lodging. After we came to the understanding from our communication with the Ethics Committee and the Ethics staff that Carib News was the official sponsor and had responsibility to pay for Members' lodging. We understood that that payment had to be made by Carib News.

Subsequently, circumstances around the Members attending further reinforced that. We got word from Members' staff in Antigua that because of a pending bill in Congress that those Members who were scheduled to come to Antigua would not be coming; the vote was going to be taken that Friday or that Saturday. Any rooms that were reserved for the Members were then released, because, as you know, we had two hotels, one was a preferred, and there were a number of people who wanted to come to the preferred hotel, so those Members' rooms were released.

Just in the middle of the conference, on the Friday, we were advised again that some Members the vote was taken on a Friday and some Members would in fact be coming in on that Saturday, and arrangements were made for the Members to then arrive on Saturday. We had to then rearrange the rooms for those Members, and we're grateful that those Members came because they were able to make a contribution, but they came at the very last day.

At the end of the conference, we settled with the hotel which Carib News issued a check for \$39,000 including approximately \$3,000 for Members' lodging. It is our understanding and we believe that payments applied to Members' lodging, especially since they arrived at the end of the conference and their previous rooms were cancelled, that Carib News in fact paid for the Members' lodging.

Mr. Stoddard. Does that complete your statement, sir?

The Witness. That completes my statement.

Chairman Butterfield. All right, Mr. Stoddard.

Mr. Stoddard. Thank you, Mr. Chairman.

EXAMINATION

BY MR. STODDARD:

Q. Mr. Rodney, you stated that you learned—in your statement you learned that Carib News had to pay for those rooms. When did you learn that precisely?

A. It's between—the best of my recollection, we were in conversation back and forth with the Ethics Committee, as you know, as to the definition of sponsors and as to the definition of participation. So we learned between October 12th and October 15th that the definition of sponsor as defined by the Ethics Committee was in fact determined. And that is [when] we determined the venue, we determined the content, we selected the country and we were responsible for all the planning and operation of the conference.

Q. And so your testimony is that you actually paid for the rooms prior to the conference, or you knew you were going to pay for the rooms prior to the conference, is that correct?

A. I am not clear on the question.

Q. The conference was held in November, is that correct?

A. That is correct.

Q. And you indicated that on October 31st the Government of Antigua paid the amount that you had told them they needed to pay for the rooms for Members of Congress and VIPs, is that correct?

A. In the basic agreement it was stated October 3 and October 5—those were the numbers you showed us—that Antigua, like several other sponsors, were listed by us as sponsors. We were being very transparent. They were listed as sponsors.

The Ethics Committee then determined and advised us that Carib News was the sponsor because of the conditions that they determined. We took that to mean we were to sponsor it back in October between the 12th and the 15th, as I mentioned. When that happened and we became the sponsor, the same companies that we listed originally in our application to say these are, in layman terms, sponsors, Ethics said they are no longer sponsors. You are. Those same companies were then determined by the same committee that there are no[t] participants.

That is our understanding, and that is how we operated from there on in. That we were the sponsor, the others were participants. This is clarified and determined in the Members going back and forth with Ethics.

Ethics then said to us, they are participants. They are not cosponsors. The determination now goes forward, you are responsible for the Members' lodging.

That is our understanding, and that's how we operated with all the ones we listed and were told that they had to be participants.

Q. When the Government of Antigua paid for the rooms on October 31st, what was your understanding as to their responsibility to pay for the rooms?

A. The Government of Antigua paid that amount, \$31,500, for—we used the word "VIPs". October 5th and 2nd we added the word "Members". On October 31st, it was clear that we are paying for VIPs.

Gentlemen, we have 50 speakers at this conference. I said it over and over, we have something like 23 sessions, we have 50 speakers, and so then five who are Members of Congress. The Government of Antigua attempts to pick up some of the expenses of those speakers. Before October 3rd and 5th, Members were included in those. After that, they're removed from that because that was our understanding; and that's what we proceeded from there.

Q. So at the time—to ask my question again, maybe I'm not making it clear—at the time that the Government of Antigua paid for rooms for lodging of Members and VIPs to the conference, under the agreement that you reached

with them you had known at that point that they were no longer able to do that, is that correct?

A. Counsel, I'm not clear that I understand your question.

Q. I want you to for a second forget your conversation with the committee and forget the discussion you had about sponsors and participants. I want to deal only with the Government of Antigua. You had an agreement with the Government of Antigua that they would pay for the rooms of Members of Congress and VIPs, is that not correct?

A. October 5th and October 2nd the reference that you gave to us suggested at that time there was this agreement or requirement that Antigua would pay for Members and VIPs.

Q. So that was the agreement you had with them prior to the conference?

A. Prior to the 12th of October.

Q. And they subsequently paid on the 31st of October, is that correct? According to your statement you just provided us, on October 31st the government paid for those rooms?

A. That's correct.³⁰⁷

In his testimony as quoted above, Mr. Rodney stated that "Ethics" told him that the corporations and the Government of Antigua were not co-sponsors and therefore could not pay for the Members expenses.³⁰⁸ He stated he informed the Government of Antigua of this decision.³⁰⁹ However, Mr. Rodney could not produce emails or other records of any communication containing any language that would support this statement.³¹⁰ In fact, a review of the emails sent by Ms. Olson clearly contradicted this statement as she continued to ask what role the corporations and the Government of Antigua had in regard to the conference.³¹¹ The only email from anyone on the Standards Committee directing the Foundation to change the title of the corporations from sponsor to participant was in relation to the advertising for the conference in late October, after the Foundation made it clear that none of the corporations were providing funding or other support to the conference.³¹²

3. Contributors to the 2007 Conference

The Subcommittee received records from American Airlines, Pfizer, Macy's East, Verizon, HSBC Bank, and AT&T regarding their support of the 2007 and 2008 conferences. The Subcommittee also received records from the Carib News Foundation pursuant to a subpoena. The records, including the unsigned sponsor form, agenda, and Web site advertisement, indicated that before the 2007 conference, the Foundation listed several corporations as "sponsors"

³⁰⁷ *Id.* at 3–8.

³⁰⁸ Karl Rodney December 1, 2009, Tr. at 6–7.

³⁰⁹ *Id.* at 6.

³¹⁰ *Id.* at 39–40.

³¹¹ See Exhibits 15 and 23.

³¹² See Exhibit 38.

for the 2007 conference.³¹³ Among those listed were CITI, Pfizer, Macy's East, AT&T, Verizon, HSBC Bank, IBM, and American Airlines.³¹⁴

(a) Solicitations for Contributions

Beginning in April 2007, Karl Rodney sent letters to corporations soliciting financial or other support for the 2007 conference to be held in Antigua.³¹⁵ Language in each of the letters invites the corporations to “become one of the corporate sponsors for this history—making event,” which refers to the “very special conference of international significance” scheduled for November 8–11, 2007, in Antigua & Barbuda.³¹⁶

An April 23, 2007, letter to Marie Long, Vice President Constituency Relations, AT&T Foundation, stated that the Foundation will “always highlight AT&T’s role and position AT&T to get the full advantage of all aspect[s] of the Conference.”³¹⁷ The second page of the letter it stated, “As a Prime Sponsor, AT&T will be highlighted in conference marketing materials, advertising, brochures, invitation letters and public placement banners both in the U.S., Panama, and Other Caribbean countries.”³¹⁸ In the following paragraph, it continues to discuss the benefits of becoming a sponsor, stating, “Prime Sponsors get prime access to key elected officials through [a] private reception, seating at Luncheon and Dinner, photo opportunities, etc. AT&T will be able to host special receptions, conduct workshops and chat rooms on topics that are strategic to your business and industry.”³¹⁹ This letter contained the text “cc: Congressman Charles Rangel” at the bottom.³²⁰

The letters to Citibank, dated April 30, 2007; IBM Corporation, dated April 23, 2007; Macy’s East, dated April 23, 2007; HSBC Bank, dated April 30, 2007; and Pfizer, dated April 30, 2007, all contained the same language quoted above.³²¹ The letters differed only in details related specifically to the particular recipient corporation.³²²

In the solicitation letter to American Airlines, dated April 23, 2007, the letter contained the same language on the first page as the other letters; however, the second page was significantly different.³²³ In this letter, Karl Rodney told American Airlines that he expected “20 Members of Congress” to attend the 2007 conference.³²⁴ He also stated he would position American Airlines as the “main carrier to the Caribbean transporting the elected officials and celebrities.”³²⁵ The letter also asked American Airlines to participate as a Gold Sponsor of the event and indicated that American Airlines “would be recognized as a mainsponsor.”³²⁶ In return for being named a Gold Sponsor, the Foundation asked American

³¹³ See Exhibits 8, 12 and 13.

³¹⁴ *Id.*

³¹⁵ See Exhibits 36–37, 39–47

³¹⁶ *Id.*

³¹⁷ See Exhibits 36.

³¹⁸ *Id.*

³¹⁹ *Id.*

³²⁰ *Id.*

³²¹ See Exhibits 39–43.

³²² *Id.*

³²³ See Exhibits 37.

³²⁴ *Id.*

³²⁵ *Id.*

³²⁶ *Id.*

Airlines to provide 50 roundtrip coach class tickets and 35 round trip first-class tickets to be used for the conference, and five coach and five first-class tickets to be used for site inspection and pre-conference planning.³²⁷ The letter also contained a carbon copy annotation at the bottom with copies apparently going to Representatives Rangel, Gregory Meeks and Eddie Bernice Johnson, in addition to an individual named Dale Morris.³²⁸

(b) Contributions by Sources that Employ or Retain Lobbyists

As indicated in the chart below, corporations that employ or retain lobbyists contributed funds to the Foundation or Carib News for the 2007 conference. As the records received from Carib News indicated, these corporations were solicited by Karl Rodney to donate funds expressly for the conference.³²⁹ Karl Rodney sent invoices to the corporations for payment of their contributions that specified the contributions were for the 2007 conference.³³⁰ The invoices sent by Karl Rodney to each of the corporations that pledged to donate funds clearly state “Sponsor for the Twelfth Annual Caribbean Multi-National Business Conference.”³³¹ In addition to the funds contributed to the conference, each corporation sent representatives to participate in presentations during the conference.³³²

Based on documents provided by the Foundation pursuant to subpoena, the following corporations contributed the amounts indicated below to Carib News for the 2007 conference:

TABLE 1.—CORPORATE CONTRIBUTIONS FOR THE 2007 CONFERENCE³³³

AT&T	\$25,000
CITI	\$50,000
IBM	\$18,000
Macy’s East	\$17,500
HSBC Bank	\$15,700
Pfizer	\$25,000
Preferred Health Partners	\$10,000
GWI Consulting	\$10,000
Golden Krust Bakeries	\$5,000
Royal Caribbean Bakeries	\$5,000

³³³ Subcommittee review of checks from the listed corporations payable to Carib News, Inc. for 2007 conference.

According to these documents, Carib News received contributions of \$181,200 for the 2007 conference.³³⁴ These companies were also listed on the advertising Web site for the 2007 conference and identified as “sponsors.”³³⁵ The figure does not include the value of any airline ticket received from American Airlines or lodging and meals paid for by the Government of Antigua.

³²⁷ *Id.*

³²⁸ *Id.*

³²⁹ See Exhibits 36–37, 39–47.

³³⁰ See Exhibits 48–55.

³³¹ *Id.*

³³² Correspondence from Karl Rodney to each of the corporate sponsors indicating which sessions they would participate in.

³³⁴ *Id.*

³³⁵ See Exhibit 12.

(c) American Airlines Donated Airline Tickets for the 2007 Conference

American Airlines, a corporation that employs or retains federally registered lobbyists, donated 25 airline tickets to Carib News specifically for the 2007 conference.³³⁶ These tickets consisted of 5 coach class tickets for the pre-site inspection and 20 tickets—10 first-class and 10 coach tickets—for the conference itself.³³⁷ American Airlines did not specifically instruct Carib News to use the tickets for congressional travel, Carib News' use of the donated tickets was restricted to travel related to the 2007 conference.³³⁸ The solicitation letter and subsequent emails between Patricia Louis and American Airlines personnel clearly indicate that many of the tickets were to be used by Members of Congress.³³⁹ For example, the following section of an email was sent from Donna Eisenman of American Airlines to Patricia Louis on October 24, 2007:

From: Eisenman, Donna
 Sent: Wednesday, October 24, 2007 9:12 AM
 To: 'plouis'
 Cc: Guerrero, MarieFrance
 Subject: RE: Congressional reservations
 Patricia,
 Recap for promotional free tickets:
 10 First Class/Business
 (1.) Karl Rodney
 (2.) Faye Rodney
 (3.) Charles Rangel
 (4.) Eric Eve (11/3—confirmed coach since business class sold out/11/11 return business class)
 (5.) Maxine Waters
 (6.) Sydney Williams
 (7.) Bennie Thompson
 (8.) Dr. London Thompson
 (9.) Stephen Rangel
 (10.) Eddie Bernice Johnson (10/24—authorized per your email)³⁴⁰

The above excerpt from an email sent on October 24, 2007, confirms that both American Airlines and Patricia Louis were aware that the free promotional tickets provided by American Airlines were going to be used for at least some congressional travel at the time the Private Sponsor Travel Certification form was completed and forwarded to Members.³⁴¹ Even though some of the Members listed in the email did not actually attend the conference or utilize the tickets, it is clear that Mr. Rodney and Ms. Louis intended to use the free promotional tickets for some Members. Regardless of Karl Rodney's belief that he could use the tickets as he chose, be-

³³⁶ See Exhibit 56.

³³⁷ *Id.*

³³⁸ Subcommittee counsel telephone conference with William Farah, Counsel for American Airlines in November 2009. See also Exhibit 64.

³³⁹ See Exhibits 57–58 and 64.

³⁴⁰ See Exhibit 58.

³⁴¹ It should be noted that several of the Members identified in the email did not travel to the conference as planned. Additional emails between Patricia Louis and American Airlines provided the final identification of the congressional Members who actually used the promotional tickets.

cause his intent was to use some of the tickets for Members' travel, that intent should have been reported to Ms. Olson during the review process.³⁴² In fact, an earlier email sent on September 21, 2007, also identified Members of Congress who were to be issued donated free tickets.³⁴³ Even though Mr. Rodney testified before the Subcommittee that he could use the donated airline tickets any way he wanted to, it is clear that as early as September 21, 2007, he intended to use them for congressional travel.³⁴⁴

American Airlines provided the Subcommittee with copies of the tickets assigned to congressional travelers for the 2007 conference.³⁴⁵ The tickets were specifically donated for the 2007 conference, although not designated for congressional travel.³⁴⁶ After the 2007 conference, Ms. Louis inquired about some of the promotional tickets that were not used and whether they could be used for a different event.³⁴⁷ American Airlines' response indicated that the 25 tickets were donated only for the 2007 conference and could not be used for any other event.³⁴⁸

(d) Lodging and Meals Paid for by the Government of Antigua

The Subcommittee received documents from Unique Vacations, Inc., the U.S. representative for Sandals Resorts, which included a contract for the lodging, meals, and conference facilities for the 2007 conference. This contract was signed by Faye Rodney on behalf of the Foundation on May 5, 2007.³⁴⁹ Also included in the materials provided by Unique Vacations was a copy of a memorandum dated October 3, 2007, which was sent from Karl Rodney to the Honorable Dr. Errol Cort, Minister of Finance and the Economy, Government of Antigua.³⁵⁰ The memorandum stated that the Foundation had an agreement with the Government of Antigua, which was to pay \$31,500 for 25 rooms for Members of Congress and other VIPs.³⁵¹

Unique Vacations subsequently sent an invoice for \$31,500 to Dr. Cort on October 16, 2007.³⁵² On October 25, 2007, the Government of Antigua wire transferred \$31,500 to the account belonging to Unique Vacations, Inc., as indicated in a wire transfer record provided to the Subcommittee by Unique Vacations, Inc.³⁵³ Mr. Rodney testified that the payment made by the Government of Antigua was not used for Members' lodging and that he informed them that they could not be sponsors for the event.³⁵⁴ However, the total cost paid by the Government of Antigua was not reduced after Mr. Rodney allegedly informed the Government of Antigua that it could not pay for the Members' lodging.³⁵⁵ Mr. Rodney told the Subcommittee that the Government of Antigua understood that it

³⁴² See Exhibits 57–58 and 64.

³⁴³ See Exhibit 58.

³⁴⁴ Karl Rodney December 1, 2009, Tr. at 83.

³⁴⁵ See Exhibits 59–63.

³⁴⁶ See Exhibit 64.

³⁴⁷ *Id.*

³⁴⁸ *Id.*

³⁴⁹ See Exhibit 2.

³⁵⁰ See Exhibit 3.

³⁵¹ *Id.*

³⁵² See Exhibit 65.

³⁵³ See Exhibit 66.

³⁵⁴ Karl Rodney December 1, 2009, Tr. at 4, 8 and 12.

³⁵⁵ *Id.* at 8–9 and 12.

would not be paying for the Members' lodging.³⁵⁶ Mr. Rodney testified that he had no records supporting his assertion that he gave such instructions to Antigua.³⁵⁷

On February 4, 2010, the Subcommittee received a letter from Deborah Mae-Lovell, Ambassador to the United States for the Government of Antigua.³⁵⁸ In her letter, Ambassador Mae-Lovell referenced her consultation with Dr. Cort regarding the payments made by the Government of Antigua for the 2007 conference.³⁵⁹ The letter indicated the agreement between Carib News and the Government of Antigua was for the government to be responsible for the cost of the rooms used for Members of Congress who attended the conference.³⁶⁰ Carib News had informed the Government that there would be approximately 25 Members in attendance.³⁶¹ The Ambassador further indicated that it was "always the intention of the Government of Antigua and Barbuda to cover the cost of accommodation for the Members of Congress."³⁶² Additionally, the Ambassador stated, "The agreement with the Government and Carib News was specific to covering the cost of accommodation for the Members of Congress. They played an integral role in the Conference."³⁶³

4. Truthfulness of the Information Provided to Members and the Standards Committee

In addition to accurately and truthfully identifying all sponsors for privately-sponsored travel, a sponsor must also provide a good faith estimate or the actual amount of the expenses the sponsor plans to pay for each traveler on the Private Sponsor Travel Certification Form.³⁶⁴ The sponsor provides this form to each Member to enable them to complete their own traveler forms.³⁶⁵ The signatory must certify that the information provided on the forms submitted to the Members is "true, complete, and correct to the best of [his or her] knowledge."³⁶⁶

On the 2007 sponsor form submitted to Members for the 2007 conference, Karl Rodney certified to the truthfulness and completeness of the information on the form.³⁶⁷ In the spaces for expenses, the block "good faith estimate" was checked and the amounts provided in the spaces were \$320.00 for transportation, \$330.00 for lodging, and \$195.00 for meals for each person.³⁶⁸ Patricia Louis forwarded the form to the Members in October 2007.³⁶⁹ Staff who completed the traveler form for their respective Members all told the Subcommittee staff that they relied on the information pro-

³⁵⁶ *Id.*

³⁵⁷ *Id.* at 39.

³⁵⁸ Exhibit 133.

³⁵⁹ *Id.*

³⁶⁰ *Id.* at 1.

³⁶¹ *Id.*

³⁶² *Id.*

³⁶³ *Id.* at 2.

³⁶⁴ Instructions for Completing the Private Sponsor Travel Certification Form. http://ethics.house.gov/Media/PDF/Instructions_Sponsor_Certification_Form_2008.pdf (last visited February 23, 2010). See also House Rule XXV, Clause 5(b)(3).

³⁶⁵ *Id.*

³⁶⁶ Certification language from page 3 of the Private Sponsor Travel Certification Form.

³⁶⁷ See Exhibit 67.

³⁶⁸ *Id.* at 3.

³⁶⁹ From the facsimile record on the form, it appears the form was sent to Members on October 5, 2007. See Exhibit 90.

vided by the Foundation in completing the forms and had no reason to believe the information was incorrect.³⁷⁰

A review of the documents received from the Foundation pursuant to subpoena indicated that Faye Rodney signed a contract with Unique Vacations, Inc., on May 5, 2007.³⁷¹ The contract provided the actual rates for the rooms for the conference.³⁷² It listed the rates as \$350.00 per night per single room, \$420.00 per night per double room and \$420.00 per night for “comp concierge upgrade” room.³⁷³ Since the conference was scheduled for four days and three nights, the lowest cost for lodging would have been \$1,050.00 if a Member attended all three days of the conference.³⁷⁴ The Subcommittee learned that some Members attended the conference for fewer than the total three nights as indicated in Table 2 below, and that Mr. Rodney knew this fact prior to the conference.³⁷⁵ Despite this knowledge, Mr. Rodney still estimated the cost of lodging and meals for those Members staying fewer than three nights to be \$330.00, the same cost as those Members who planned to stay for the full three night duration.³⁷⁶ In fact, the total lodging cost of \$330.00 estimated by Mr. Rodney was actually lower than the actual cost of lodging for one night.³⁷⁷ During his Subcommittee interview, Mr. Rodney stated that he believed the \$330.00 entered on the form was for a single night’s lodging and meals rather than the total cost for the entire conference.³⁷⁸ However, Mr. Rodney had also entered the amount of \$110.00 in response to question 19 of the sponsor form, which asks for the per night lodging cost.³⁷⁹

It is clear that Mr. Rodney would have known the actual lodging and meals rates for the Members several months before he completed the Private Sponsor Travel Certification Form, as he had reviewed the contract prior to its acceptance.³⁸⁰ He also sent the October 3, 2007, memorandum to the Minister of Finance at the same time he signed the Private Sponsor Travel Certification Form.³⁸¹ In the memo, Mr. Rodney indicated the total cost per room for Members and VIPs was \$1,260.00, even though he was aware that some Members would not be staying for three nights.³⁸² Even if he still chose to use the good faith estimate, the amount should have been \$1,260.00, rather than the \$330.00 he entered on the sponsor form.³⁸³

Mr. Rodney identified meal costs separately on the sponsor form as \$195.00. Even adding this amount to the \$330.00 lodging cost, the sum of \$525.00 is still less than half of \$1,260.00, the amount he actually agreed to pay under the terms of the contract. It is also less than the \$1,260.00 per room he advised Dr. Cort that the Government of Antigua was responsible for paying. However, the ac-

³⁷⁰ Murray Tr. at 15, Scott Tr. at 10, and Campbell Tr. at 11.

³⁷¹ See Exhibit 2.

³⁷² *Id.*

³⁷³ *Id.*

³⁷⁴ *Id.*

³⁷⁵ See Subcommittee interviews of Representatives Rangel, Thompson, Clarke, and Christensen. See also Karl Rodney December 1, 2009, Tr. at 110.

³⁷⁶ See Exhibit 67.

³⁷⁷ See Exhibit 2.

³⁷⁸ Karl Rodney October 28, 2009, Tr. at 94.

³⁷⁹ *Id.*

³⁸⁰ Subcommittee interview of Karl Rodney on October 28, 2009.

³⁸¹ See Exhibits 3 and 67.

³⁸² See Exhibit 3.

³⁸³ See Exhibit 67.

tual rate on the sponsor form for lodging and meals should have been zero, because only the Foundation was identified as the sponsor. Because the Government of Antigua had agreed to pay for the rooms used by the Members before Mr. Rodney completed the sponsor form, Mr. Rodney was aware that the Foundation would not be responsible for the lodging payment. Additionally, the amount listed on the sponsor form for transportation should also have been only \$22.00, because American Airlines provided the tickets used by the Members and the family Members that accompanied them. The Foundation was only responsible for the \$22.00 in taxes for each ticket.

Mr. Rodney certified that the Carib News Foundation was the sole sponsor of the event, despite his knowledge that other entities had paid for aspects of the trip, including transportation, lodging, meals and conference fees for the congressional travelers.³⁸⁴ Mr. Rodney provided the Private Sponsor Travel Certification Form containing false or misleading information to the Members he invited to attend the 2007 conference. In turn, Members forwarded the form submitted to them from Mr. Rodney along with their own travel forms to the Standards Committee for review. The Members also certified the information contained in the forms submitted to the Standards Committee was true, based on the certification from Mr. Rodney. This placed the Members in an unwitting position of submitting false or incorrect information to the Standards Committee.

Mr. Rodney also failed to list the conference fees that he waived for each Member. Since he had waived this fee for the past conferences, this figure should have been anticipated and included.

Additionally, in November 2007, the Foundation provided the congressional travelers to the 2007 conference with documentation that indicated the final value of transportation, lodging and meals, per Member, for the trip.³⁸⁵ This information is normally provided by private sponsors to be used by Members to complete the required Post-Travel Disclosure Forms. Staff Members testified that they relied on the information provided by the Foundation to complete the Post-Travel Disclosure Forms for their respective Members. According to the Post-Travel Disclosure Forms submitted to the Clerk's office by each Member,³⁸⁶ the cost of transportation, lodging, and meals for each Member for the 2007 conference were:

TABLE 2.—TOTAL COSTS PER MEMBERS FOR THE 2007 CONFERENCE ACCORDING TO KARL RODNEY

Member/Family Member	Transportation	Lodging	Meals
Rep. Charles Rangel	\$490	\$410	Included
Rep. Bennie Thompson	\$364.30	\$410	\$195
Dr. London Thompson	\$364.30	\$0	\$195
Rep. Yvette Clarke	\$370	\$330	\$195
Del. Donna Christensen	\$490	\$410	Included

However, according to the records provided by the Foundation pursuant to subpoena, the actual expenses paid by the Foundation on behalf of each Member are indicated in the table below. These

³⁸⁴ See Exhibit 67.

³⁸⁵ See Exhibit 68.

³⁸⁶ See Exhibits 69–72.

figures are based on the lodging (which included the meals) having been paid for by the Government of Antigua, and the use of the American Airlines tickets. Additionally, Mr. Rodney failed to report the conference fee for each Member.

TABLE 3.—ACTUAL COSTS INCURRED BY THE CARIB NEWS FOUNDATION PER MEMBER FOR THE 2007 CONFERENCE

Member/Family Members	Transportation ³⁸⁷	Lodging ³⁸⁸	Meals	Other
Rep. Charles Rangel	\$22	\$0 (1 night)	Included
Rep. Bennie Thompson	\$22	\$0 (2 nights)	Included
Dr. London Thompson	\$22	\$0	Included
Rep. Yvette Clarke	\$22	\$0 (2 nights)	Included
Del. Donna Christensen	\$22	\$0 (1 night)	Included

³⁸⁷ The Foundation was only responsible for paying the \$22 tax per ticket for the tickets provided by American Airlines. American Airlines advised the Subcommittee that an actual value for the tickets could not be determined because of the nature of the promotional tickets. However, they subsequently provided the walk-up fare that would have been charged if the tickets were purchased the day of travel at the ticket counter. American Airlines explained that it does not claim any value for tax purposes. See Exhibits 26–31.

³⁸⁸ The lodging costs were paid by the Government of Antigua and should have been reported at the rate paid and the Government of Antigua should have been identified as the source.

Had American Airlines been properly identified as a co-sponsor for the 2007 conference, the Foundation would have had to report the costs paid on behalf of the Members as well as the amounts indicated in the chart below.³⁸⁹ The transportation costs as indicated in the table below should have been reported to the Members by American Airlines at the fair market value pursuant to the gift rule because the tickets had no actual face value.³⁹⁰ The lodging rates identified in the table below should have been reported as paid by the Government of Antigua:

TABLE 4.—LODGING COSTS INCURRED BY THE GOVERNMENT OF ANTIGUA PER MEMBER FOR THE 2007 CONFERENCE

Member/Family Member	Transportation ³⁹¹	Lodging ³⁹²	Meals	Other
Rep. Charles Rangel	\$2,018	\$420 (1 night)	Included
Rep. Bennie Thompson	\$2,165	\$840 (2 nights)	Included
Dr. London Thompson	\$2,165	\$0	Included
Rep. Yvette Clarke	\$1,358	\$840 (2 nights)	Included
Rep. Donna Christensen	\$1,358	\$420 (1 night)	Included

³⁹¹ These figures were provided in correspondence from William Farrah, counsel for American Airlines. To the Investigative Subcommittee on February 2, 2010.

³⁹² Even though the Government of Antigua paid for rooms based on the full stay, these figures represent the cost of meals and lodging for each Member based on the actual number of nights each Member stayed.

Based on the amounts for lodging in the contract, the payment made by the Government of Antigua, and the actual number of nights each Member stayed in Antigua, Mr. Rodney and Ms. Louis provided incorrect information regarding the actual expenses in the post-travel memo.³⁹³ This placed the Members in the unwitting position of filing false or incorrect information with the House Clerk's Office.³⁹⁴

³⁸⁹ These figures are based on correspondence between Subcommittee counsel and William Farrah, Counsel for American Airlines on February 2, 2010.

³⁹⁰ House Rule 25, clause 5(a)(1)(B)(ii).

³⁹³ See Exhibits 86, 89, 91, and 92.

³⁹⁴ See Exhibits 69–72.

B. THE 2008 CARIB NEWS FOUNDATION MULTI-NATIONAL BUSINESS CONFERENCE

1. Attendance by Members and Staff

The 13th Annual Carib News Foundation Multi-National Business Conference was held in St. Maarten, N.A., during November 2008.³⁹⁵ The Investigative Subcommittee confirmed through interviews and a review of documents filed with the Standards Committee and the Office of the Clerk of the House that Members and staff who received reimbursement for privately sponsored travel to attend the 2008 Carib News Foundation conference were:

- Representative Charles Rangel;
- Representative Bennie Thompson, accompanied by his wife, Dr. London Thompson;
- Delegate Donna Christensen;
- Representative Carolyn Kilpatrick; and
- Representative Donald Payne.³⁹⁶

The Subcommittee also interviewed Representative Sheila Jackson Lee regarding her attendance at the 2008 conference.³⁹⁷ Representative Jackson Lee did not accept reimbursement for travel expenses from the Carib News Foundation for her travel.³⁹⁸ She attended the 2008 conference but did not attend the 2007 conference, although she had attended four to five conferences prior to 2007.³⁹⁹ Representative Jackson Lee stated that she normally attends only one day of the multi-day conferences.⁴⁰⁰ She said she ordinarily makes a presentation during that day and attends the round table, closed-door session with the ministers and heads of state from the Caribbean nations.⁴⁰¹ As was her custom, Representative Jackson Lee only attended one day at the 2008 conference.⁴⁰²

Prior to 2007, the Rules allowed Members to accept travel without prior approval, and Representative Jackson Lee had accepted travel to the conference from the Foundation.⁴⁰³ In 2008, she thought the same rules applied and did not submit a pre-travel request to the Standards Committee.⁴⁰⁴ As a result, she did not receive approval for the trip so she paid for the trip herself.⁴⁰⁵ Representative Jackson Lee indicated that she used campaign funds to pay for the airfare and personal funds to pay for the lodging.⁴⁰⁶ She spent one night at the resort and the room was initially paid for as part of the Foundation's package, so she requested an invoice from the Foundation and paid them directly for the room.⁴⁰⁷ Representative Jackson Lee told the Subcommittee that she paid the Foundation \$310.00 for one night's lodging, which included meals.⁴⁰⁸ This amount was actually more than the amount the

³⁹⁵ See Exhibit 74.

³⁹⁶ See Exhibits 97-98, 105, 108, and 113.

³⁹⁷ Subcommittee interview of Representative Jackson Lee on October 8, 2009.

³⁹⁸ Jackson Lee Tr. at 6-8.

³⁹⁹ *Id.*

⁴⁰⁰ *Id.*

⁴⁰¹ *Id.* at 6.

⁴⁰² *Id.* at 9.

⁴⁰³ *Id.* at 7.

⁴⁰⁴ *Id.*

⁴⁰⁵ *Id.* at 6-7.

⁴⁰⁶ *Id.* at 6-8.

⁴⁰⁷ *Id.* at 14.

⁴⁰⁸ *Id.*

Foundation contracted for with the Sonesta Maho Resort.⁴⁰⁹ The highest rate she should have paid for meals and lodging for the one night stay would have been \$196.00.⁴¹⁰

2. Pre-travel Approval Process

On August 20, 2008, Patricia Louis sent a facsimile to Dawn Kelly Mobley regarding the 2008 Multi-National Business Conference.⁴¹¹ The facsimile indicated it included a completed form and several attachments regarding travel for Members of Congress to the 2008 conference.⁴¹² On August 22, 2008, Standards Committee staff assistant Hilary Smith responded to the facsimile by email to Karl Rodney.⁴¹³ In her email response to Mr. Rodney, Ms. Smith informed him that under new travel rules, the Standards Committee no longer approved trips in general for privately sponsored travel.⁴¹⁴ Ms. Smith explained that each congressional invitee must obtain individual permission to attend the trip by submitting the Private Sponsor Travel Certification Form.⁴¹⁵ She further explained that the sponsor completes this form and submits it to each invitee, along with a detailed agenda for the invitee.⁴¹⁶ The invitee must forward the sponsor form along with the agenda and a traveler form completed by the invitee to the Standards Committee for review.⁴¹⁷ Ms. Smith further informed Mr. Rodney in the email that the Standards Committee would review the trip paperwork and if everything was in order the invitee would receive a letter from the Standards Committee approving the trip.⁴¹⁸

(a) Information Provided by Margaret Perl

On September 24, 2008, Margaret Perl, counsel to the Standards Committee, sent an email to carib-desk@att.net regarding the 2008 conference.⁴¹⁹ Ms. Perl indicated in her email that she had received the sponsor form for the 2008 conference and needed to speak with someone at the Foundation because she had several questions.⁴²⁰ Ms. Perl stated during her interview with Subcommittee counsel that she had concerns about the conference based on problems encountered the year before.⁴²¹ Ms. Perl stated that after she had been assigned to review the trip, she looked up the sponsor in the Standards Committee's database and saw that the Carib News Foundation had sponsored similar trips in previous years.⁴²² She spoke to Susan Olson, who had reviewed the 2007 trip.⁴²³ Since Ms. Perl had only been with the Standards Committee a short period of time, she explained that it was her normal practice to speak with whomever reviewed prior trips from the requesting spon-

⁴⁰⁹ See Exhibit 91.

⁴¹⁰ *Id.*

⁴¹¹ See Exhibit 73.

⁴¹² See Exhibit 74.

⁴¹³ See Exhibit 75.

⁴¹⁴ *Id.*

⁴¹⁵ *Id.*

⁴¹⁶ *Id.*

⁴¹⁷ *Id.*

⁴¹⁸ See Exhibit 75.

⁴¹⁹ See Exhibit 76.

⁴²⁰ *Id.*

⁴²¹ Perl Tr. at 6.

⁴²² *Id.* at 5.

⁴²³ *Id.*

sor.⁴²⁴ Ms. Perl stated that she performed this process to see if there were any problems that she should be aware of regarding the sponsor or trip.⁴²⁵ Ms. Perl further stated that the Carib News “folk” were difficult to contact.⁴²⁶ As a result, she had to send several emails or make numerous phone calls to obtain the information she needed to review the trip.⁴²⁷ She stated that she had to “kind of pull” information out of them.⁴²⁸

Ms. Perl stated that the majority of the conversations she had with Ms. Olson dealt with the agenda and not the possibility of corporate sponsors.⁴²⁹ The agenda caused concerns because of the trip to Montserrat, West Indies, during the 2007 conference that was not approved in advance.⁴³⁰ Ms. Perl indicated one of the issues she wanted to speak with the Foundation about involved the location of the conference events and whether local transportation would be used.⁴³¹

Ms. Perl indicated that when she first received the assignment to work on the Carib News Foundation conference for 2008, she reviewed the packets submitted by a few of the Members as they came in to verify the information provided in the packets was complete.⁴³² This was her customary practice.⁴³³ She explained the required information included: the traveler form—filled out by the Member’s office; the sponsor form—filled out by the sponsor; the agenda for the event—that would describe the agenda for the particular Member submitting it; and an invitee list that would identify all House Members or staff who have been invited by the sponsor.⁴³⁴ Ms. Perl stated that it was her normal procedure to contact the submitting invitee if the packets are not complete and advise them as to what information they are missing.⁴³⁵ Ms. Perl did not recall if there was any information missing from the initial packets she reviewed in 2008.⁴³⁶

Ms. Perl explained the next step in her review included a substantive review of the information contained on the forms.⁴³⁷ She explained that this review included ensuring that the information on the Member’s travel form was filled out correctly, verifying that the dates corresponded with the event, and determining if the Member planned to take any additional days at his or her own expense.⁴³⁸ Ms. Perl then reviewed the forms to determine if the Member was taking a spouse or family Member.⁴³⁹ She also looked to see if all the dates matched up throughout the forms and if there was any contradictory information on the forms.⁴⁴⁰

Ms. Perl stated her next step in the review process was to review the private sponsor certification form and ensure all of the ques-

⁴²⁴ *Id.* at 4–5.

⁴²⁵ *Id.*

⁴²⁶ *Id.* at 7.

⁴²⁷ *Id.* at 6.

⁴²⁸ *Id.* at 7.

⁴²⁹ *Id.* at 7.

⁴³⁰ *Id.* at 9.

⁴³¹ *Id.*

⁴³² *Id.* at 10.

⁴³³ *Id.*

⁴³⁴ *Id.*

⁴³⁵ *Id.* at 10–11.

⁴³⁶ *Id.*

⁴³⁷ *Id.* at 11.

⁴³⁸ *Id.*

⁴³⁹ *Id.*

⁴⁴⁰ *Id.* at 11–12.

tions on the form were answered and there was internal consistency in the answers.⁴⁴¹ This step included checking the total cost for lodging against the daily rate to make sure they were consistent.⁴⁴² Then, Ms. Perl routinely reviewed the agenda to ensure it included information showing that the Members' activities constituted officially connected travel.⁴⁴³ She explained that there cannot be excessive free time.⁴⁴⁴ The agenda should have demonstrated substantial sessions or that Members were speaking at certain times.⁴⁴⁵ She would also look to see if all of the events that Members participated in had locations and times associated with them.⁴⁴⁶

Ms. Perl indicated that the Foundation had provided each invitee with a three-page private sponsor form as well as a two-page attachment used to answer two of the questions on the form regarding the sponsor.⁴⁴⁷ She said that this was not unusual because many sponsors want to use the "regular blurb" they use on press releases.⁴⁴⁸

During her review, Ms. Perl routinely made notes on the forms for issues that required follow-up.⁴⁴⁹ Ms. Perl contacted the person responsible for the particular form to get additional information from them or clarify the information already provided.⁴⁵⁰ In addition, she would use the invitee list to verify that anyone submitting a request to attend the trip is included as an invitee by the sponsor and are not just adding themselves to the trip.⁴⁵¹

Ms. Perl clarified that the entire packet is submitted by Members [or travelers] although she has learned that Members are not necessarily familiar with the information contained in their packet, as it is normally completed by a member of their staff.⁴⁵² Therefore, if she notices a problem with the sponsor form during her review, she usually contacts the sponsor directly.⁴⁵³

Ms. Perl indicated that whenever she has questions about information provided on the Member's form, she usually contacts the Member's staff person identified on that form.⁴⁵⁴ If the Member signs the form himself or herself and does not identify a staff person, she would call the Member's office and ask to speak with a staff person who is familiar with the trip.⁴⁵⁵ She has very rarely contacted a Member directly about a trip.⁴⁵⁶ In connection with the 2008 Carib News trip, Ms. Perl did not recall talking directly with any Member.⁴⁵⁷

⁴⁴¹ *Id.* at 12.

⁴⁴² *Id.*

⁴⁴³ *Id.*

⁴⁴⁴ *Id.*

⁴⁴⁵ *Id.*

⁴⁴⁶ *Id.*

⁴⁴⁷ *Id.* at 13.

⁴⁴⁸ *Id.*

⁴⁴⁹ *Id.* at 14.

⁴⁵⁰ *Id.*

⁴⁵¹ *Id.*

⁴⁵² *Id.* at 15.

⁴⁵³ *Id.*

⁴⁵⁴ *Id.*

⁴⁵⁵ *Id.*

⁴⁵⁶ *Id.* at 16.

⁴⁵⁷ *Id.*

After reviewing the forms, Ms. Perl also checks two public Web sites.⁴⁵⁸ Ms. Perl checks the sponsor's Web site to see how they describe themselves and what information is listed about the event.⁴⁵⁹ Ms. Perl also checks the IRS' Web site for the tax status of the sponsor.⁴⁶⁰ Thus, if the sponsor identifies itself as a non-profit entity or organization (exempt from paying federal taxes), Ms. Perl checks the IRS Web site to verify that status.⁴⁶¹ Ms. Perl recalled checking both sites in her review of the Foundation's 2008 conference.⁴⁶² In doing so, she discovered that the Foundation did not have a public Web site, and any search for the Foundation linked to the Carib News, Inc., Web site.⁴⁶³ Ms. Perl believed that Carib News, Inc., was a for-profit newspaper.⁴⁶⁴ On its Web site, she found information related to the conference and knew it to be the Foundation's premier event.⁴⁶⁵ The Web site included information about the Foundation and the Rodneys.⁴⁶⁶

Ms. Perl verified that the Carib News Foundation was listed as a § 501(c)(3) entity on the IRS' Web site.⁴⁶⁷ Since the Foundation was listed as a non-profit, she did not do any further research.⁴⁶⁸ Ms. Perl stated that after the trip she learned additional information about section 501(c)(3) entities that she did not know previously: there are two types of section 501(c)(3) organizations; one is a private foundation and the other a public charity.⁴⁶⁹ Because tax status as either a private foundation or a public charity did not affect the travel rules, she did not look at this information before approval of the 2008 trip.⁴⁷⁰ However, subsequent to the trip, Ms. Perl learned that there are certain tax rules that may be implicated when a private foundation (versus a public charity) provides international travel to government officials.⁴⁷¹ Ms. Perl learned that when a private foundation (versus a public charity) provides international travel to government officials, tax penalties may be assessed against the traveler, as well as the foundation.⁴⁷²

Ms. Perl stated that when she reviewed the conference Web site, she noted there was a page that indicated corporate sponsors were involved in the trip.⁴⁷³ She saw a list with logos of several corporations that were identified as sponsors.⁴⁷⁴ Based on seeing the corporate logos on the Web site and understanding that there were corporate sponsors listed for the 2006 conference, Ms. Perl asked Karl and Faye Rodney directly if corporations were to be involved in the 2008 conference as they were in the past.⁴⁷⁵ She stated that this occurred during a phone conversation with both Karl and Faye Rodney during which Mrs. Rodney did 90% of the talking.⁴⁷⁶ Ms.

⁴⁵⁸ *Id.*

⁴⁵⁹ *Id.* at 16–17.

⁴⁶⁰ *Id.*

⁴⁶¹ *Id.*

⁴⁶² *Id.*

⁴⁶³ *Id.* at 17.

⁴⁶⁴ *Id.*

⁴⁶⁵ *Id.*

⁴⁶⁶ *Id.* at 18.

⁴⁶⁷ *Id.* at 18–19.

⁴⁶⁸ *Id.* at 19–20.

⁴⁶⁹ *Id.* at 19–20.

⁴⁷⁰ *Id.* at 21.

⁴⁷¹ *Id.* at 21–22.

⁴⁷² *Id.* at 21.

⁴⁷³ *Id.* at 22.

⁴⁷⁴ *Id.*

⁴⁷⁵ *Id.* at 23–25.

⁴⁷⁶ *Id.* at 24.

Perl recalled that Mrs. Rodney told her that the information on the Web site was outdated and still listed corporate sponsors for the 2008 conference but stated that there were no corporate sponsors for the 2008 conference. According to Ms. Perl, Mrs. Rodney explained that the Foundation received funds from corporations and individuals who made donations for the Foundation's work all year long.⁴⁷⁷

Ms. Perl stated her understanding that the House travel rules do not prohibit a corporation from paying for a particular event at a conference.⁴⁷⁸ The issue is whether the corporate donations are used to pay for congressional travel expenses.⁴⁷⁹ The fact that there were corporate sponsors only requires that further questions be asked and information verified about what the corporate donations are being used for.⁴⁸⁰

Ms. Perl also explained that her understanding of the term "earmark" is when a corporation donates funds to a conference intending or resulting in those funds being used for travel expenses of Members or House staff.⁴⁸¹ She further explained that if the corporation contributes to a foundation generally, and the contribution is commingled with other contributions, even if it is used later in the year for congressional travel, it would not be an earmark under the House travel rules.⁴⁸²

Ms. Perl explained that her understanding of the term "trip" is impacted by the different House rules.⁴⁸³ The first rule for attendance at a conference falls under the gift rule.⁴⁸⁴ Generally, mere attendance at conferences is allowed and does not require Standards Committee pre-approval under the "widely attended event" exception in the gift rule.⁴⁸⁵ Standards Committee pre-approval for attendance at a conference is "triggered" when the sponsor also offers to pay the transportation and lodging costs for the Member or House staffer to attend the conference.⁴⁸⁶ Based on the two rules, Ms. Perl opined that a "trip" only includes the transportation and lodging, as those are the two components that require pre-approval.⁴⁸⁷

She further added that once the conference falls under the pre-approval requirements of the travel rules, the Standards Committee forms and regulations require that all the information about the transportation, lodging, conference fees, and meals be disclosed and included in the pre-approval package.⁴⁸⁸

On September 30, 2008, Ms. Perl spoke with Karl and Faye Rodney over the telephone to discuss the Private Sponsor Travel Certification Form and agenda for the 2008 conference.⁴⁸⁹ She asked them specifically about contributions made to the Foundation for

⁴⁷⁷ *Id.*

⁴⁷⁸ *Id.* at 26–27.

⁴⁷⁹ *Id.*

⁴⁸⁰ *Id.* at 25.

⁴⁸¹ *Id.* at 26. Ms. Perl used the term "staffer" generically for Members, officers, and employees.

⁴⁸² *Id.* at 26–27.

⁴⁸³ *Id.* at 27.

⁴⁸⁴ *Id.* at 28.

⁴⁸⁵ *Id.* at 27–28.

⁴⁸⁶ *Id.* at 28.

⁴⁸⁷ *Id.* at 28–29.

⁴⁸⁸ *Id.* at 29.

⁴⁸⁹ *Id.* at 9.

the conference.⁴⁹⁰ In a memorandum she wrote after the conversation, Ms. Perl memorialized Mr. and Mrs. Rodney's responses to her questions.⁴⁹¹ She wrote that the Rodneys explained that corporations which retain lobbyists donate funds generally to the Foundation throughout the year.⁴⁹² These contributions, according to Mr. and Mrs. Rodney, were placed into a general fund and then used for multiple program activities.⁴⁹³ Mr. and Mrs. Rodney told Ms. Perl that there was no designation or earmarking of the funds for the conference and no requests to the sponsors to pay for congressional travel.⁴⁹⁴ Mr. and Mrs. Rodney told her that there were no parts of the conference sponsored by any corporation and that any information contained on the Web site suggesting otherwise was incorrect.⁴⁹⁵

During the conversation with Mr. and Mrs. Rodney, the two told Ms. Perl that they had negotiated a room rate of around \$110.00 per night for the most basic room and commercial flights were approximately \$410 per Member.⁴⁹⁶ Meals were included in the room rate except for special event dinners, which would have cost an additional \$145.00 for the entire conference.⁴⁹⁷ Ms. Perl asked Mr. and Mrs. Rodney about whether there were any expenses that had not been identified on the sponsor form.⁴⁹⁸ In response, she was assured that the Foundation was paying for everything out of funds that had been contributed to the Foundation's general fund throughout the year.⁴⁹⁹ Mr. and Mrs. Rodney also told Ms. Perl that the host country cultural program was an event at the hotel paid for by Carib News.⁵⁰⁰

Ms. Perl stated that she read each item on the conference agenda provided by the Foundation so that Mr. and Mrs. Rodney could verify the location of each event.⁵⁰¹ Mr. and Mrs. Rodney assured Ms. Perl that each of the events would be held at the resort and that no ground transportation would be used.⁵⁰² Thereafter, Ms. Perl instructed Mr. and Mrs. Rodney to resubmit an agenda with the locations for each of the events listed.⁵⁰³

Ms. Perl asked the Rodneys to verify that no corporate sponsors would be sponsoring an event at the conference.⁵⁰⁴ Mrs. Rodney responded that the logos on the Web site were a mistake and that they would not be having sponsors "this year."⁵⁰⁵ Ms. Perl believed that Ms. Rodney's response indicated there had been corporate sponsors at past conferences.⁵⁰⁶

Ms. Perl did not explain to the Rodneys the different scenarios about when a corporation should be listed as a sponsor because the Rodneys made "broad representations" that they weren't going to

⁴⁹⁰ *Id.* at 36–37.

⁴⁹¹ *See* Exhibit 77.

⁴⁹² *Id.*

⁴⁹³ *Id.* at 24.

⁴⁹⁴ *Id.* at 25.

⁴⁹⁵ *Id.* at 25–26.

⁴⁹⁶ Perl Interview of Karl and Faye Rodney, September 24, 2008.

⁴⁹⁷ *Id.*

⁴⁹⁸ Perl Tr. at 35–36.

⁴⁹⁹ *Id.* *See also* Perl Interview of Karl and Faye Rodney, September 24, 2008 at 42–45.

⁵⁰⁰ Perl Interview of Karl and Faye Rodney, September 24, 2008.

⁵⁰¹ Perl Tr. at 23–25.

⁵⁰² *Id.* at 25.

⁵⁰³ *Id.*

⁵⁰⁴ *Id.* at 24.

⁵⁰⁵ *Id.*

⁵⁰⁶ *Id.* at 25.

have any conference sponsors for the 2008 conference.⁵⁰⁷ They told Ms. Perl that because of what they learned from past conferences, they were going to do things differently for the 2008 conference and made the representation both on the phone and in writing that there would not be any corporate sponsors for the event itself, only corporations that contributed to the Foundation's general fund throughout the year.⁵⁰⁸

Ms. Perl explained to Subcommittee counsel that the definition of "sponsor" is an entity that is actually organizing, sponsoring, "putting together the logistics" of an event, not an entity that is merely providing financial support.⁵⁰⁹ If an entity is solely donating funds to an event but does not have a role in organizing it, then the traveler cannot accept the trip.⁵¹⁰ However, Ms. Perl stated that any entity that is providing financial support and organizing a trip must be listed as a sponsor.⁵¹¹

Ms. Perl stated that based on her conversation with the Rodneys and the repeated assurances they provided, she was reasonably confident that the Foundation was not using sources of funding solicited specifically for the conference but that they were using general funds they received throughout the year.⁵¹² When asked why she was confident of this fact, she replied it was because Mr. and Mrs. Rodney were "pretty strong" about this issue on the phone and had written it on the form.⁵¹³ Ms. Perl also did not see anything that suggested or indicated sponsorship opportunities for the conference.⁵¹⁴ She stated that her questions about the sponsorship could not be misinterpreted and the Rodneys were clear in their responses.⁵¹⁵ After receiving the assurances from Mr. and Mrs. Rodney that no other sponsors were involved in the 2008 conference, Ms. Perl recommended the travel for Members be approved.⁵¹⁶

Ms. Perl stated that she became aware of information after the conference that made her believe that Mr. and Mrs. Rodney were not truthful in their responses to her questions.⁵¹⁷ She read news articles that indicated events, such as travel offsite to attend a luau, occurred at the conference that were not included in the agenda.⁵¹⁸ She also discovered that the Foundation was not a public charity and based on the tax filing she questioned whether it was a legitimate company.⁵¹⁹ She obtained and reviewed the IRS Form 990PF filed by Karl Rodney for 2005 that listed zero expenses and zero contributions for the Foundation during that tax year.⁵²⁰ Because she was aware that the Foundation held a conference in 2005, it was not possible that the Foundation would not have received any contributions or not have had any expenses in 2005.⁵²¹

⁵⁰⁷ *Id.*

⁵⁰⁸ *Id.*

⁵⁰⁹ *Id.* at 51.

⁵¹⁰ *Id.* at 51–52.

⁵¹¹ *Id.* at 52–53.

⁵¹² *Id.* at 73.

⁵¹³ *Id.*

⁵¹⁴ *Id.*

⁵¹⁵ *Id.* at 73–74.

⁵¹⁶ *Id.* at 74.

⁵¹⁷ *Id.* at 74–75.

⁵¹⁸ *Id.*

⁵¹⁹ *Id.* at 76.

⁵²⁰ See Exhibit 78.

⁵²¹ Perl Tr. at 76–77.

Ms. Perl explained that the sponsor would send the final expenses paid on behalf of each Member to the Member after the trip because the Members do not receive the actual bills or invoices.⁵²² The sponsor provided the Members the only information that was required to complete their post-travel forms.⁵²³ She explained the amounts should be different for the Members because each Member would have different flight itineraries and varying lengths of stay.⁵²⁴

3. Corporate Contributors to the 2008 Conference

As with the 2007 conference, Mr. Rodney began soliciting donations specifically for the 2008 conference from several corporations. Mr. Rodney sent a letter to American Airlines on June 6, 2008, soliciting sponsorship of the 2008 conference.⁵²⁵ The letter mentioned that elected officials from the U.S. and Caribbean would be present.⁵²⁶ The letter stated, “We are open to our customary barter of tickets for sponsorship levels, and have enclosed a proposed arrangement guide similar to last year.”⁵²⁷ Mr. Rodney did not provide the proposed arrangement guide, which was enclosed in the letter to American Airlines, with his subpoena return.

Mr. Rodney sent a letter to AT&T on April 4, 2008, soliciting its sponsorship for the 2008 conference.⁵²⁸ The letter states, “We can assure you that all the key stakeholders, Members of Congress, Heads and Ministers of Government, elected Officials, Community and Business Leaders are all aware and appreciative of yours [sic] and AT&T’s participation in this very important mission.”⁵²⁹ On September 10, 2008, Carib News, Inc. sent AT&T Foundation an invoice for \$25,000 and included “Multi-National Business Conference” in the description.⁵³⁰

Mr. Rodney sent a letter to Citigroup, Inc. on April 4, 2008, soliciting its sponsorship for the 2008 conference.⁵³¹ The letter contained the same language regarding Members of Congress, etc., as did the letter to AT&T and the other corporations.⁵³² Mr. Rodney sent an invoice on behalf of Carib News, Inc. to Citigroup on May 22, 2008, for \$75,000 and included “Sponsor for the Thirteenth Annual Caribbean Multi-National Business Conference” in the description.⁵³³

From records provided to the Subcommittee by Representative Rangel’s counsel, it appears that HSBC Bank was also solicited to contribute to the 2008 conference and had initially agreed to do so.⁵³⁴ Subsequently, HSBC apparently informed Faye Rodney that they were withdrawing their support as a result of an article in the

⁵²² *Id.* at 85.

⁵²³ *Id.*

⁵²⁴ *Id.*

⁵²⁵ See Exhibit 79.

⁵²⁶ See Exhibit 79.

⁵²⁷ See Exhibit 79.

⁵²⁸ See Exhibit 80.

⁵²⁹ See Exhibit 80.

⁵³⁰ See Exhibit 81.

⁵³¹ See Exhibit 82.

⁵³² *Id.*

⁵³³ See Exhibit 83.

⁵³⁴ See Exhibit 84. Ms. Sherwood is described as Counsel to Representative Rangel at his New York District office. She advised Subcommittee staff that she does have a J.D. degree, but is not a member of a bar and is not licensed to practice law.

New York Post regarding the 2007 conference.⁵³⁵ On September 25, 2008, Faye Rodney contacted Representative Rangel's district office regarding HSBC Bank's withdrawal of support from the 2008 conference.⁵³⁶ Mrs. Rodney's communication with Representative Rangel's district office was reported to Representative Rangel in a memorandum from Ms. Sherwood, counsel to Representative Rangel.⁵³⁷ The memorandum stated that Faye Rodney called to "express her distress, displeasure, and great concern that executives from HSBC Bank informed her that they intend to pull their financial support from the 2008 Carib News Foundation Conference."⁵³⁸ According to the memo, Mrs. Rodney spoke with Ms. Sherwood, Jim Capel and Elbert Garcia (all staffers of Representative Rangel) regarding HSBC Bank's decision and informed them that the Foundation's "other major sponsor ATT [sic] is holding strong, but the revelation that HSBC is pulling out might well rattle other sponsors and put the future of the Conference in jeopardy."⁵³⁹

The memorandum suggested possible solutions to prevent HSBC's withdrawal of sponsorship.⁵⁴⁰ It stated, "After conferring with George and Emile, we determined that there are several options we might explore to preserve HSBC's commitment to the Conference."⁵⁴¹ Ms. Sherwood suggested that Bill Thompson (then Comptroller of the City of New York) be asked to contact HSBC.⁵⁴² The memo stated that Mr. Thompson was previously recognized at a luncheon sponsored by Carib News and was praised by HSBC Bank executives.⁵⁴³ It also noted that Mr. Thompson "has consistently indicated" that he would "do whatever is necessary" to support Representative Rangel.⁵⁴⁴ According to the memorandum, Ms. Sherwood suggested that Mr. Thompson be asked to reach out to HSBC to see if "reconsideration is an option."⁵⁴⁵ Ms. Sherwood also suggested that Mr. Thompson might go through "back channels" with Mayor Bloomberg or the "Council Speaker" to see if HSBC would reconsider its withdrawal of support.⁵⁴⁶ The memorandum to Representative Rangel concludes, "Please advise how you wish to proceed."

Despite evidence indicating HSBC's withdrawal of support, documents provided to the Investigative Subcommittee by HSBC indicated that it provided a check payable to Carib News, Inc., dated October 14, 2008, in the amount of \$25,000.⁵⁴⁷ This amount was \$10,000 more than the amount HSBC provided to Carib News, Inc. for the 2007 conference.⁵⁴⁸ A copy of the 2007 check was included in the materials provided by the Foundation to the Subcommittee pursuant to the subpoena.⁵⁴⁹ During a telephone conference with Subcommittee staff, HSBC officials stated that they chose to pay

⁵³⁵ See Exhibit 84.

⁵³⁶ *Id.*

⁵³⁷ *Id.*

⁵³⁸ *Id.*

⁵³⁹ *Id.*

⁵⁴⁰ *Id.*

⁵⁴¹ *Id.*

⁵⁴² *Id.*

⁵⁴³ *Id.*

⁵⁴⁴ *Id.*

⁵⁴⁵ *Id.*

⁵⁴⁶ *Id.*

⁵⁴⁷ See Exhibit 85.

⁵⁴⁸ Copy of check from HSBC to Carib News provided by Karl Rodney. See Exhibit 85.

⁵⁴⁹ *Id.*

for advertising in the conference materials.⁵⁵⁰ The officials stated they were never contacted by anyone from Representative Rangel's office, Mr. Thompson, or Mayor Bloomberg.⁵⁵¹

Based on a review of the documents provided by the Foundation pursuant to subpoena, it appears the following corporations contributed the listed amounts to the Foundation for the 2008 conference:

TABLE 4.—CORPORATE CONTRIBUTIONS TO THE 2008 CARIB NEWS FOUNDATION MULTI-NATIONAL BUSINESS CONFERENCE ⁵⁵²

AT&T	\$25,000
CITI	\$75,000
IBM	\$20,000
Macy's East	\$20,000
Pfizer	\$25,000
Verizon	\$35,000
Turner Construction Co	\$5,000
HSBC Bank	\$25,000
Total	\$230,000

⁵⁵² Copies of checks from the companies listed for the 2008 conference provided by Karl Rodney.

According to the records obtained by Subcommittee counsel, including the HSBC contribution, Carib News, Inc. received contributions of \$230,000 for the 2008 conference as indicated in Table 4, above.⁵⁵³ The amount does not include the value of any airline tickets received or payments made by the Government of St. Maarten, pursuant to the standard agreement with Carib News, Inc.⁵⁵⁴ American Airlines indicated it provided ten promotional tickets to Carib News, Inc. for the 2008 conference.⁵⁵⁵ None of these tickets were used for congressional travel.⁵⁵⁶

A copy of an invoice from the Sonesta Maho Beach Resort & Casino, dated November 4, 2008, indicates the total cost for the 2008 conference, including conference facilities and lodging, came to \$111,001.40.⁵⁵⁷ This amount included \$86,272.00 for lodging, which consisted of an all-inclusive package including meals.⁵⁵⁸ It also included \$23,229.40 for a welcome reception, private event fee, and coffee break for 196 persons.⁵⁵⁹ Also included was an estimated fee of \$1,500.00 for audiovisual support.⁵⁶⁰

It is clear that Karl Rodney paid for the 2008 conference with corporate donations even though he told Ms. Perl that no corporate funds would be used.⁵⁶¹ According to Ms. Perl, Karl and Faye Rodney were "pretty strong" in their statements to Ms. Perl about not having corporate sponsors and certified that no corporate funding would be used for the conference.⁵⁶² However, contrary to the Rod-

⁵⁵⁰ Subcommittee counsel telephone interview of HSBC employee, Javier Evans, on October 22, 2009.

⁵⁵¹ *Id.*

⁵⁵³ *Id.*

⁵⁵⁴ See Exhibit 86–87.

⁵⁵⁵ See Exhibit 88.

⁵⁵⁶ *Id.*

⁵⁵⁷ See Exhibit 89.

⁵⁵⁸ *Id.*

⁵⁵⁹ *Id.*

⁵⁶⁰ *Id.*

⁵⁶¹ See Exhibits 35, 81, 83, 85.

⁵⁶² Perl Tr. at 73.

neys' assertions to Ms. Perl, the record clearly indicates that corporations were solicited and received invoices for payments from Mr. Rodney specifically to support the 2008 conference, as opposed to contributing generally to the Foundation.⁵⁶³ In addition, the record indicates that the contributions from the corporations were actually made to Carib News, Inc. and not to the Foundation.⁵⁶⁴ In light of this information, the contributing corporations, including Carib News, Inc. should have been identified as sponsors of the 2008 conference.⁵⁶⁵ It is also clear that Mr. and Mrs. Rodney provided false information to Ms. Perl and their assertions to the contrary were patently false.⁵⁶⁶

4. Truthfulness of the Information Provided to Members and the Standards Committee

As noted above, in addition to accurately and truthfully identifying all sponsors for privately-sponsored travel, the sponsor must also provide a good faith estimate or the actual amounts paid for each traveler on the Private Sponsor Travel Certification Form.⁵⁶⁷ The sponsor provides this information to each Member to enable the Member to complete his or her own travel form.⁵⁶⁸ The sponsor must certify that the information provided on the form they submit to the Member is "true, complete, and correct to the best of [their] knowledge."

(a) Information Provided on the Private Sponsor Travel Certification Form

On the 2008 Private Sponsor Travel Certification Form submitted to Members for the 2008 conference, Karl Rodney certified to the truthfulness of the information on that form.⁵⁶⁹ In his response to question 19 on the Private Sponsor Travel Certification Form, which related to the cost per night for lodging, the amount entered was \$110.00.⁵⁷⁰ In the space for expenses, the following amounts were entered: \$410.00 for transportation; \$260.00 for lodging; \$145.00 for meals; \$150.00 for "other"—conference registration; and \$25.00 for "other"—transportation.⁵⁷¹ This form was submitted by facsimile to the Members in late October 2008.⁵⁷² House staffers who completed the 2008 Traveler forms on behalf of their Member or themselves all stated that they relied on the information provided by the Foundation in completing the forms and had no reason to believe the information was incorrect because Karl Rodney signed the certification statement on the form.⁵⁷³

⁵⁶³ See Exhibits 79–83.

⁵⁶⁴ Copies of checks for the 2008 conference payable to Carib News and deposited in Carib News, Inc. corporate bank accounts provided by Karl Rodney. These checks are not included as Exhibits to protect the account information.

⁵⁶⁵ *Id.*

⁵⁶⁶ Perl Tr. at 73.

⁵⁶⁷ Instructions for Completing the Private Sponsor Travel Certification Form, http://ethics.house.gov/Media/PDF/Instructions_Sponsor_Certification_Form_2008.pdf (last visited February 23, 2010). See also House Rule XXV, clause 5(b)(3).

⁵⁶⁸ *Id.*

⁵⁶⁹ See Exhibit 90.

⁵⁷⁰ *Id.*

⁵⁷¹ *Id.*

⁵⁷² *Id.*

⁵⁷³ See Exhibit 91.

(b) Contracted Cost of Lodging and Meals

A review of the documents received from the Foundation pursuant to subpoena indicates that Mr. Rodney signed a contract with Sonesta Maho Beach Resort and Casino on June 12, 2008.⁵⁷⁴ The contract provided the agreed-upon rates for the rooms for the conference.⁵⁷⁵ These rates included meals. The contract listed the rates for lodging as \$196.00 per night per single room, \$135.00 *per person* per night, \$145.00 *per person* per night for a junior suite and \$155.00 *per person* per night for a suite, based on double occupancy.⁵⁷⁶ Mr. Rodney reserved 130 rooms for the conference, which included 125 standard rooms and five junior suites.⁵⁷⁷

Since the conference was scheduled for four days and three nights, the lowest cost for lodging would have been \$588.00 per person for a single room and between \$810.00 and \$930.00 for the double rooms and suites; not the \$260.00 entered on the travel forms.⁵⁷⁸ Since Mr. Rodney had agreed to these contracted amounts several months before he completed the Private Sponsor Travel Certification Form, he should have provided the actual amount.⁵⁷⁹ At a minimum, his estimate could have been more accurate. Mr. Rodney identified meals separately, indicating the total as \$145.00 per person.⁵⁸⁰ Even adding this amount to the room rate he claimed on the form, since meals were included in the contract rate, the rate of \$405.00 was still less than half of what he actually agreed to pay in the contract.⁵⁸¹

(c) Post-Travel Cost Information

In November 2008, Patricia Louis provided the Members who attended the conference with the final cost per Member for the 2008 conference.⁵⁸² Ms. Louis told the Subcommittee that she received the information from Mr. Rodney.⁵⁸³ House staffers who filled out the Post-Travel Disclosure Forms for Members who attended the 2008 conference told Subcommittee staff that they relied on the information provided by Ms. Louis to complete the Post-Travel Disclosure Forms.⁵⁸⁴ The memorandum Ms. Louis emailed to each of the Members indicated the same rates for each Member even though Mr. Rodney knew the Members stayed for differing numbers of days and traveled from different locations.⁵⁸⁵ The rates listed in the memorandum were: Airfare—\$410.00; Hotel—\$405.00; and Registration/Transportation—\$175.00.⁵⁸⁶ The memorandum indicated a total cost of \$990.00.⁵⁸⁷ According to the Post-Travel Disclosure Forms submitted to the Clerk's office for each Member, the

⁵⁷⁴ *Id.*

⁵⁷⁵ *Id.*

⁵⁷⁶ *Id.*

⁵⁷⁷ *Id.*

⁵⁷⁸ See Exhibit 90.

⁵⁷⁹ See Exhibit 91.

⁵⁸⁰ See Exhibit 90.

⁵⁸¹ *Id.*

⁵⁸² See Exhibit 92.

⁵⁸³ Louis Tr. at 69 and 78.

⁵⁸⁴ Dalley Tr. at 58, Murray Tr. at 23–24, Scott Tr. at 20, Campbell Tr. at 17–18, Thomas

Tr. at 17–18.

⁵⁸⁵ Karl Rodney October 28, 2009, Tr. at 95–96.

⁵⁸⁶ See Exhibit 92.

⁵⁸⁷ *Id.*

transportation, lodging, meals, and other costs each Member listed for the 2008 conference were:

TABLE 5.—TOTAL COSTS PER MEMBER AS REPORTED TO THE HOUSE CLERK⁵⁸⁸

Member/Family Member	Transportation	Lodging	Meals	Other
Rep. Charles Rangel	\$410	\$260	\$145	\$175
Rep. Bennie Thompson	\$410	\$405	Included	\$175
Dr. London Thompson	\$410	Included	Included	n/a
Rep. Carolyn Cheeks Kilpatrick	\$410	\$405	Included	\$175
Marsha Cheeks	\$410	\$405	Included	\$175
Rep. Donald Payne	\$410	\$405	Included	\$175
Del. Donna Christensen	\$410	\$270	Included	\$175

⁵⁸⁸ See Exhibits 97, 98, 105, 108, 113.

According to the records provided by Carib News, Inc. and the Foundation pursuant to subpoena, the actual expenses that should have been reported were:

TABLE 6.—ACTUAL EXPENSES FOR MEMBERS ATTENDING THE 2008 CONFERENCE⁵⁸⁹

Member/Family Member	Transportation	Lodging	Meals	Other
Rep. Charles Rangel	\$752.15	\$290 (2 nights)	Included	\$175
Rep. Bennie Thompson	\$800.15	\$870	Included	\$175
Dr. London Thompson	\$800.15	n/a	Included	n/a
Rep. Carolyn Cheeks Kilpatrick	\$626.15	\$870	Included	\$175
Marsha Cheeks	\$626.15	n/a	Included	\$175
Rep. Donald Payne	\$412.15	\$465	Included	\$175
Del. Donna Christensen	\$585.35	\$465	Included	\$175

⁵⁸⁹ Air transportation and lodging information obtained from records provided by Karl Rodney.

Based on the amounts for lodging listed in the contract, Mr. Rodney and Ms. Louis incorrectly reported the transportation and lodging expenses to the Members.⁵⁹⁰ This false information may have placed the Members at risk of submitting inaccurate information to the Clerk's office. Karl Rodney also overcharged Representative Jackson Lee for her one-night stay by charging her \$310.00, when the actual cost, as indicated in the contract, would have been no more than \$196.00 for a single night's stay.⁵⁹¹

Additionally, if the Government of St. Maarten paid for the rooms used by the Members, as was the standard agreement with Carib News, Inc., the costs reported to the Members should have been zero for lodging.⁵⁹² The Subcommittee has been unable to obtain information directly from either the Sonesta Maho Resort or the Government of St. Maarten regarding this possible payment.⁵⁹³

C. INTERVIEWS OF MEMBERS WHO ATTENDED THE 2007 OR 2008 CONFERENCES

In addition to Representative Jackson Lee, the Subcommittee interviewed Representatives Bennie Thompson, Carolyn Cheeks Kilpatrick, Donald Payne, Yvette Clarke, Charles Rangel, and Delegate Donna Christensen regarding their attendance at the 2007 and/or 2008 conferences.

⁵⁹⁰ See Exhibit 92.

⁵⁹¹ See Exhibit 91.

⁵⁹² See Exhibit 86.

⁵⁹³ Subcommittee counsel contacted the Sonesta Maho Hotel and the Government of St. Maarten and requested information regarding the 2008 conference. Neither entity has responded to the Subcommittee's request.

1. Representative Bennie Thompson

Representative Bennie G. Thompson was interviewed under oath by the Investigative Subcommittee on October 7, 2009.⁵⁹⁴ Representative Thompson verified that he attended both the 2007 and 2008 Carib News Foundation conferences.⁵⁹⁵ He also told the Subcommittee that he had attended four to five conferences prior to 2007.⁵⁹⁶ He knew both Karl and Faye Rodney because of the conferences, but had no interaction with either of them outside the conferences.⁵⁹⁷ He stated that he learned of each year's conference when he received an invitation.⁵⁹⁸ He normally reviews all of the invitations he receives weekly but only attends a few events because of other commitments.⁵⁹⁹ He told the Subcommittee that he is invited to the conference each year because of his Chairmanship of the Homeland Security Committee and the issues he deals with involving the Caribbean such as drug trafficking, travel, and visas.⁶⁰⁰

Representative Thompson stated that the Carib News Foundation paid for his and his wife's expenses for both conferences.⁶⁰¹ He was shown a copy of the Private Sponsor Travel Certification forms and the Private-Sponsor Travel: Traveler Forms for each year.⁶⁰² He told the Subcommittee that his scheduler normally fills out the forms and submits them to the Standards Committee once he decides to accept an invitation.⁶⁰³ He had not seen any of the forms provided by the sponsor before seeing them in the OCE referral material provided to him by the Standards Committee.⁶⁰⁴ He acknowledged reviewing and signing the traveler forms prior to their submission to the Standards Committee.⁶⁰⁵

Representative Thompson was shown a copy of the Standards Committee's letter approving his travel to and attendance at the 2007 conference.⁶⁰⁶ He stated he had seen the letter before and understood it to be the approval from the Standards Committee for him to attend the 2007 conference.⁶⁰⁷ Representative Thompson told the Subcommittee that he believed that, because the information was submitted to the Standards Committee and the Standards Committee approved both trips, he did not violate any rules.⁶⁰⁸

Representative Thompson was not aware that the airline tickets provided to him for the 2007 conference were actually provided by American Airlines and not paid for by the Foundation.⁶⁰⁹ He told the Subcommittee that officials at Carib News told him they had paid for the airfare.⁶¹⁰ Representative Thompson discussed the value of the conferences for Members and especially for him as

⁵⁹⁴ Thompson Tr. at 3.

⁵⁹⁵ *Id.* at 7.

⁵⁹⁶ *Id.* at 7–8.

⁵⁹⁷ *Id.* at 6 and 23.

⁵⁹⁸ *Id.* at 8–9.

⁵⁹⁹ *Id.*

⁶⁰⁰ *Id.* at 6–7.

⁶⁰¹ *Id.* at 18–19.

⁶⁰² See Exhibit 93–94.

⁶⁰³ Thompson Tr. at 15, 25–27.

⁶⁰⁴ *Id.* at 11.

⁶⁰⁵ *Id.* at 11–12, 15.

⁶⁰⁶ See Exhibit 95.

⁶⁰⁷ Thompson Tr. at 12.

⁶⁰⁸ *Id.* at 19–20.

⁶⁰⁹ *Id.* at 19.

⁶¹⁰ *Id.*

Chairman of the Homeland Security Committee.⁶¹¹ He stated that he spent most of the time at the conference meeting on Homeland Security issues.⁶¹² Representative Thompson said that he noticed corporate logos on banners and signs but did not pay much attention to them.⁶¹³ He did not recall corporate sponsors being mentioned during any opening remarks or at other events.⁶¹⁴

Representative Thompson also reviewed the Post-Travel Disclosure Forms filed with the Clerk's office after the two conferences.⁶¹⁵ He stated he reviewed and signed the forms.⁶¹⁶ He told the Subcommittee that he checked to see if the amounts were on the forms because he would not have signed the forms without the amounts.⁶¹⁷ He also stated that he had no reason to doubt the accuracy of the amounts provided to him by the Foundation.⁶¹⁸

Representative Thompson was not aware of the tax penalties for accepting travel from a private foundation until he read about them in OCE's report.⁶¹⁹ He also did not know that the Carib News Foundation was a private foundation, or even what the difference was between a private foundation and a public charity.⁶²⁰

2. Representative Carolyn Cheeks Kilpatrick

Representative Carolyn Cheeks Kilpatrick was interviewed under oath by the Investigative Subcommittee on October 6, 2009.⁶²¹ Representative Kilpatrick verified she attended the 2008 conference but did not attend the 2007 conference.⁶²² She also indicated she had attended a few conferences prior to 2007.⁶²³ During her interview, Representative Kilpatrick also discussed the value of the conference.⁶²⁴ Representative Kilpatrick made some remarks at the conference about the support of various "sponsors" to the event but did not know that any entity other than Carib News Foundation paid for any part of the conference.⁶²⁵ She explained her use of the word "sponsor" referred to the participation of the various businesses in working with issues in the Caribbean.⁶²⁶ Representative Kilpatrick described her lodging as a one bedroom suite.⁶²⁷ Representative Kilpatrick verified that her sister, Marcia Cheeks, attended the conference, and that she believed her sister's expenses were paid for by the Carib News Foundation.⁶²⁸ She also stated that her daughter and granddaughter attended the conference and that their expenses were paid using personal funds.⁶²⁹ Representative Kilpatrick said she knew the Rodneys from the conferences but

⁶¹¹ *Id.* at 6–7.

⁶¹² *Id.*

⁶¹³ *Id.* at 18 and 20.

⁶¹⁴ *Id.* at 21.

⁶¹⁵ *See* Exhibit 96–97.

⁶¹⁶ Thompson Tr. at 22–23.

⁶¹⁷ *Id.*

⁶¹⁸ *Id.*

⁶¹⁹ *Id.* at 23–24.

⁶²⁰ *Id.* at 23.

⁶²¹ Kilpatrick Tr. at 4.

⁶²² *Id.* at 7.

⁶²³ *Id.*

⁶²⁴ *Id.* at 9.

⁶²⁵ *Id.* at 22–23.

⁶²⁶ *Id.* at 22.

⁶²⁷ *Id.* at 24.

⁶²⁸ *Id.* at 25.

⁶²⁹ *Id.* at 24–25.

had no other affiliation with them.⁶³⁰ In fact, she referred to the Rodneys as Karl and Faye “Ramsey.”⁶³¹ She noted the presence of the corporate logos on banners and other materials but saw nothing that would indicate they sponsored any part of the travel.⁶³² Representative Kilpatrick indicated there were approximately 200–300 attendees at the conference.⁶³³

Representative Kilpatrick did not recall seeing the Private Sponsor Travel Certification Form⁶³⁴ prior to its submission to the Standards Committee.⁶³⁵ She believed that the sponsor submitted it directly to the Standards Committee.⁶³⁶ However, Representative Kilpatrick reviewed the Post-Travel Disclosure Form⁶³⁷ and signed it prior to its submission to the Clerk’s office.⁶³⁸ Representative Kilpatrick stated that the information inserted on the Post-Travel Disclosure Form was provided by the Foundation and she had no reason to question the amounts.⁶³⁹ Representative Kilpatrick did not review her airline ticket receipt to verify the amount listed for transportation by the Foundation was the same as indicated on the ticket.⁶⁴⁰ When Subcommittee staff explained that the amounts were different, Representative Kilpatrick stated she would review the information more carefully in the future.⁶⁴¹

3. Representative Yvette Clarke

Representative Yvette Clarke was interviewed under oath by the Investigative Subcommittee on October 21, 2009.⁶⁴² Representative Clarke confirmed that she attended the Carib News Foundation conference held in 2007, and that she did not attend the conference held in 2008.⁶⁴³ She related that she did not recall the exact number of conferences she had attended, but believed she has attended more than four similar conferences before 2007.⁶⁴⁴ Representative Clarke told the Subcommittee that she is familiar with the Carib News Foundation.⁶⁴⁵ She explained that the Foundation is an organization that was established to create opportunities for elected officials and business leaders to meet with heads of government and business leaders of the Caribbean.⁶⁴⁶

Representative Clarke told the Subcommittee that she knew Karl Rodney because of his leadership in the Caribbean community in New York, his ownership of the Carib News publication and that he was also a family friend.⁶⁴⁷ She explained she has known Mr. Rodney for most of her life because he attended high school with her father in Jamaica.⁶⁴⁸ She also told the Subcommittee that she

⁶³⁰ *Id.* at 8.

⁶³¹ *Id.* at 7.

⁶³² *Id.* at 21.

⁶³³ *Id.* at 26.

⁶³⁴ *See* Exhibit 90.

⁶³⁵ Kilpatrick Tr. at 14.

⁶³⁶ *Id.*

⁶³⁷ *See* Exhibit 98.

⁶³⁸ Kilpatrick Tr. at 19–20.

⁶³⁹ *Id.*

⁶⁴⁰ *Id.*

⁶⁴¹ *Id.*

⁶⁴² Clarke Tr. at 4.

⁶⁴³ *Id.* at 7.

⁶⁴⁴ *Id.* at 12.

⁶⁴⁵ *Id.* at 7.

⁶⁴⁶ *Id.*

⁶⁴⁷ *Id.* at 8.

⁶⁴⁸ *Id.*

knows Faye Rodney, whom she explained was Karl Rodney's wife.⁶⁴⁹ She was also familiar with the Rodney's executive assistant, Patricia Louis, whom she understood coordinated and scheduled meetings of Carib News, Inc. and the conference.⁶⁵⁰

Representative Clarke explained to the Subcommittee that the Carib News publication and the Carib News Foundation are two different entities run by the Rodneys.⁶⁵¹ She further explained the Foundation was established so they could do more nonprofit-type work to raise the issues of Caribbean nationals in the United States.⁶⁵²

Representative Clarke awaits the invitation to the conference each year because of its importance to her community.⁶⁵³ She was not aware of when she received the invitation to the 2007 conference, but indicated that an announcement about the conference is also published in the Carib News publication, which she receives.⁶⁵⁴ She recalled that at the time of the 2007 conference, new travel rules were in effect.⁶⁵⁵ Representative Clarke also recalled a number of briefings for Members to learn about the new travel rules.⁶⁵⁶ Based on those briefings, she knew that she needed to receive prior approval from the Standards Committee for the 2007 conference travel.⁶⁵⁷

Representative Clarke told the Subcommittee that the information on the sponsor form⁶⁵⁸ came from Karl Rodney.⁶⁵⁹ She stated the sponsor would have to provide the information on the sponsor form in order to complete the traveler form.⁶⁶⁰ She verified that the traveler form⁶⁶¹ was filled out by her then Chief of Staff, Ian Campbell.⁶⁶² Representative Clarke also verified that she authorized Mr. Campbell to sign her name on the traveler form.⁶⁶³

Representative Clarke told the Subcommittee that she was aware of corporations that had sponsored the conferences before 2007.⁶⁶⁴ She did not recall noticing any of the corporations present at the 2007 conference; but she stated that, if they were there, she did not interact with them.⁶⁶⁵ The following exchange occurred between Representative Clarke and counsel to the Subcommittee:

Q. On the forms, can you go to the first question on Exhibit 1 [Private Sponsor Travel Certification Form submitted to the Standards Committee]? The first question asked who the sponsor is, and what is written there?

A. Carib News Foundation.

Q. If you go to question 12 on the second page, there is a question that deals with sponsors. Could you read that question for us?

⁶⁴⁹ *Id.* at 9.

⁶⁵⁰ *Id.* at 9–10.

⁶⁵¹ *Id.* at 10–11.

⁶⁵² *Id.* at 11.

⁶⁵³ *Id.* at 14–15.

⁶⁵⁴ *Id.*

⁶⁵⁵ *Id.* at 15.

⁶⁵⁶ *Id.* at 15.

⁶⁵⁷ *Id.*

⁶⁵⁸ See Exhibit 67.

⁶⁵⁹ Clarke Tr. at 16–17.

⁶⁶⁰ *Id.*

⁶⁶¹ See Exhibit 99.

⁶⁶² Clarke Tr. at 17.

⁶⁶³ Clarke Tr. at 18.

⁶⁶⁴ *Id.* at 18–19.

⁶⁶⁵ *Id.* at 19.

A. "Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited."

Q. Who does it list as a private sponsor?

A. Carib News Foundation.

Q. Now, if you were aware that companies such as Macy's, Pfizer, [and] Verizon were present and actually paid for the conference, would that alert you that maybe other names should be listed there as well?

A. Not necessarily.

Q. Why is that?

A. Because I'm assuming—and maybe I should not—that those donations are made directly to the Carib News Foundation perhaps in some sort of general fund to be able to make sure that the conference goes off well.

Q. If you learned that those contributions were made directly for the payment of the conference, would that change your understanding?

A. Most likely.⁶⁶⁶

Representative Clarke reviewed the post-travel form⁶⁶⁷ and verified it was the form completed by her Chief of Staff.⁶⁶⁸ She believed he obtained the information regarding the expenses from the Rodneys.⁶⁶⁹ Representative Clarke also verified that she only spent one day at the conference and had two travel days for the 2007 conference. She believed she spent two nights at the conference.⁶⁷⁰

Representative Clarke indicated she did not review the ticket⁶⁷¹ provided to her for her travel by the Foundation.⁶⁷² She stated she was not aware that American Airlines provided the ticket for her travel.⁶⁷³

4. Delegate Donna Christensen

Delegate Donna Christensen was interviewed under oath by the Subcommittee on October 22, 2009.⁶⁷⁴ Delegate Christensen verified that she attended both the 2007 and 2008 Carib News Foundation conferences.⁶⁷⁵ She was aware that the Carib News Foundation is located in New York and that its main activity is the annual Multi-National Business conference.⁶⁷⁶ She also was aware that Carib News Foundation holds smaller events in New York. She has never attended any of those events.⁶⁷⁷ Delegate Christensen also stated that she met Karl and Faye Rodney in 1997 when she began attending the conferences. She said she had little contact with them outside of the conferences.⁶⁷⁸ She did recall having the Rodneys as guests at her table at a prayer breakfast

⁶⁶⁶ *Id.* at 19–20.

⁶⁶⁷ *See* Exhibit 100.

⁶⁶⁸ Clarke Tr. at 23.

⁶⁶⁹ *Id.*

⁶⁷⁰ *Id.* at 24.

⁶⁷¹ *See* Exhibit 101.

⁶⁷² Clarke Tr. at 25.

⁶⁷³ *Id.*

⁶⁷⁴ Christensen Tr. at 4.

⁶⁷⁵ *Id.* at 7.

⁶⁷⁶ *Id.* at 6.

⁶⁷⁷ *Id.*

⁶⁷⁸ *Id.*

and that they also attended some of the Congressional Black Caucus (CBC) legislative conferences.⁶⁷⁹

Delegate Christensen told the Subcommittee that she arrived at the 2007 conference Thursday afternoon and left Friday, midday.⁶⁸⁰ She did not recall any other Members of Congress at the conference at that time.⁶⁸¹ However, she knew that other Members came after she left.⁶⁸²

Delegate Christensen stated that when she receives invitations to events, her scheduler, Shelley Thomas, reviews them and works with her to set up travel.⁶⁸³ She verified the sponsor forms for the 2007 and 2008 conferences⁶⁸⁴ and believed they were completed by Karl Rodney.⁶⁸⁵ She also reviewed the traveler forms submitted to the Standards Committee for the 2007 and 2008 conferences⁶⁸⁶ and stated they were filled in and signed by Shelley Thomas.⁶⁸⁷

Delegate Christensen was aware that corporations were present at the conferences but believed they contributed to the Foundation and not specifically to the conference.⁶⁸⁸ She noticed signs that contained logos of corporations that were present at the conferences.⁶⁸⁹ Delegate Christensen stated there were always such signs present at the conferences.⁶⁹⁰ She did not recall any public statements thanking any corporate sponsor.⁶⁹¹

Delegate Christensen told the Subcommittee that there was a reception held in a downtown hotel hosted by the Government of St. Maarten during the 2008 conference.⁶⁹² She stated that the reception was open to all participants and the ones that attended the reception were transported by bus from the Sonesta Maho Resort.⁶⁹³ She stated it took approximately 20 minutes to travel to the reception by bus.⁶⁹⁴

Delegate Christensen verified that she signed the post-travel forms for the 2007 and 2008 conferences.⁶⁹⁵ She believed she filled out the forms herself.⁶⁹⁶ She also told the Subcommittee that the Foundation would send a form each year to the congressional travelers indicating the cost for the Members' room and travel.⁶⁹⁷ She used that information to complete the post-travel form.⁶⁹⁸ She did not realize that the form for the 2007 conference was sent to all the Members, and she believed that the amount on the form was for her one-night lodging.⁶⁹⁹

Delegate Christensen was not aware of the tax status of the Foundation or the tax rules regarding private foundations at the

⁶⁷⁹ *Id.*

⁶⁸⁰ *Id.* at 7.

⁶⁸¹ *Id.*

⁶⁸² *Id.*

⁶⁸³ *Id.* at 8.

⁶⁸⁴ *See* Exhibits 67 and 90.

⁶⁸⁵ Christensen Tr. at 9–10.

⁶⁸⁶ *See* Exhibits 102–103.

⁶⁸⁷ Christensen Tr. at 10.

⁶⁸⁸ *Id.* at 11.

⁶⁸⁹ *Id.* at 12.

⁶⁹⁰ *Id.*

⁶⁹¹ *Id.*

⁶⁹² *Id.* at 13.

⁶⁹³ *Id.*

⁶⁹⁴ *Id.*

⁶⁹⁵ *See* Exhibits 104–105.

⁶⁹⁶ Christensen Tr. at 15.

⁶⁹⁷ *Id.*

⁶⁹⁸ *Id.*

⁶⁹⁹ *Id.* at 16.

time of the two conferences.⁷⁰⁰ She stated that she now had a better understanding of the tax issue after meeting with her attorneys when the issue was raised in the OCE referral.⁷⁰¹

Delegate Christensen told the Subcommittee that it was her practice to remind other Members about upcoming Carib News conferences during CBC meetings and that she would give them information about the upcoming conferences.⁷⁰² She stated that she considered her office a point of contact for the conference.⁷⁰³ Shelley Thomas would have forms for Members who decided to attend the conference.⁷⁰⁴

Delegate Christensen stated that she used the information provided by the Foundation in filling out her forms and had no reason to question the information the Foundation provided.⁷⁰⁵ She assumed that the corporations present at the conferences donated to the Foundation generally and not specifically to the conference.⁷⁰⁶

5. Representative Donald Payne

Representative Donald Payne was interviewed under oath by the Investigative Subcommittee on October 21, 2009.⁷⁰⁷ Representative Payne confirmed that he did not attend the Carib News Foundation conference held in 2007, but did attend conferences in 2008 and prior to 2007.⁷⁰⁸ He stated he has attended a total of seven to nine conferences.⁷⁰⁹

Representative Payne stated that he knew Karl Rodney as the editor or owner of the Carib News newspaper and assumed the Carib News Foundation was a foundation that was related to the newspaper.⁷¹⁰ He also said that he was told the conference was sponsored by the Carib News Foundation.⁷¹¹ Representative Payne stated he did not know the Foundation's tax exempt status.⁷¹² Representative Payne told the Subcommittee that he had no contact or social relationship with either Karl or Faye Rodney outside the annual conferences.⁷¹³ He sees them at the conferences and knows who they are.⁷¹⁴

Representative Payne told the Subcommittee that he attends the conferences because, as co-chair of the Caribbean Caucus and Member of the Western Hemisphere Subcommittee, he deals with issues related to the Caribbean and believes it is important to attend the conferences and discuss issues affecting those countries.⁷¹⁵

Representative Payne stayed for all three days of the 2008 conference and stayed an extra two days, which he paid for personally, an arrangement that was pre-approved by the Standards Committee.⁷¹⁶ He stated he did not notice who else attended the con-

⁷⁰⁰ *Id.* at 17–18.

⁷⁰¹ *Id.*

⁷⁰² *Id.* at 20–21.

⁷⁰³ *Id.* at 21 and 25.

⁷⁰⁴ *Id.* at 25.

⁷⁰⁵ *Id.* at 27–28.

⁷⁰⁶ *Id.* at 23–24.

⁷⁰⁷ Payne Tr. at 4.

⁷⁰⁸ *Id.* at 8.

⁷⁰⁹ *Id.* at 9.

⁷¹⁰ *Id.*

⁷¹¹ *Id.* at 9–10.

⁷¹² *Id.* at 10.

⁷¹³ *Id.* at 10–11.

⁷¹⁴ *Id.*

⁷¹⁵ *Id.* at 12–13.

⁷¹⁶ *Id.* at 14.

ference but was aware that Representatives Thompson, Rangel, and Kilpatrick, and Delegate Christensen were there because of his review of the OCE report.⁷¹⁷ He said 300 to 500 people attended the conference.⁷¹⁸

Representative Payne reviewed and verified the sponsor form⁷¹⁹ for the 2008 Carib News Foundation conference.⁷²⁰ He did not recall reviewing the specific form filled out by Karl Rodney.⁷²¹ Representative Payne verified that Karl Rodney signed the certification on the third page of the form and stated that he would have relied on the information being correct because of the certification language.⁷²²

Representative Payne next verified the traveler form⁷²³ submitted to the Standards Committee for the 2008 conference and explained that his signature on the form was probably made by his scheduler, Darlene Murray.⁷²⁴ Ms. Murray has his authorization to sign his name.⁷²⁵ Representative Payne also verified the approval letter⁷²⁶ sent by the Standards Committee for the 2008 conference.⁷²⁷

Representative Payne stated that he assumed that companies contributed to the Foundation, but believed the Foundation was sponsoring the conferences.⁷²⁸ He had no reason to question the information provided by Carib News regarding the trip.⁷²⁹ Representative Payne did not recall thanking any corporation for sponsoring the trip.⁷³⁰ He stated he thanked the people who support the Foundation.⁷³¹ He did not hear anyone identifying themselves as prime sponsors of the conference because he was not paying attention to their remarks.⁷³²

Representative Payne reviewed and verified the Post-Travel Disclosure Form⁷³³ that was completed on his behalf by Ms. Murray.⁷³⁴ He recalled reviewing the form before its submission to the Clerk's office but did not know where the listed amounts for transportation, lodging, and meals came from.⁷³⁵

Representative Payne did not know the differences between different types of non-profit organizations, did not know that the Carib News Foundation was a private foundation, and did not know that there was a tax provision that specifically dealt with private foundations.⁷³⁶

⁷¹⁷ *Id.* at 13.

⁷¹⁸ *Id.* at 14.

⁷¹⁹ *See* Exhibit 90.

⁷²⁰ Payne Tr. at 17–18.

⁷²¹ *Id.* at 18.

⁷²² *Id.*

⁷²³ *See* Exhibit 106.

⁷²⁴ Payne Tr. at 20.

⁷²⁵ *Id.*

⁷²⁶ *See* Exhibit 107.

⁷²⁷ Payne Tr. at 21–22.

⁷²⁸ *Id.* at 22.

⁷²⁹ *Id.* at 18.

⁷³⁰ *Id.* at 23–24.

⁷³¹ *Id.* at 24.

⁷³² *Id.* at 25.

⁷³³ *See* Exhibit 108.

⁷³⁴ Payne Tr. at 27.

⁷³⁵ *Id.* at 27–28.

⁷³⁶ *Id.* at 29.

Representative Payne said there was no difference between the 2008 conference and the previous conferences that he attended.⁷³⁷ All of the conferences were run in the same manner and had the same types of corporate logos and banners posted.⁷³⁸

Representative Payne told the Subcommittee that he had submitted a letter and other materials to OCE and had requested to make a presentation before OCE's Board before OCE made its referral to the Standards Committee.⁷³⁹ OCE informed him that his only opportunity to make a presentation to the Board was over the Memorial Day recess.⁷⁴⁰ Representative Payne asked to reschedule the meeting for a time when Congress would be in session and when he would be in town.⁷⁴¹ However Representative Payne said that Leo Wise, OCE's Staff Director and Chief Counsel, denied Representative Payne's request, and told Representative Payne that the meetings were scheduled to accommodate OCE's Board and not Members of Congress.⁷⁴² Representative Payne also stated that OCE's report and findings did not mention or reference the letter he submitted to OCE documenting his request.⁷⁴³

6. Representative Charles Rangel

Representative Charles Rangel was interviewed under oath by the Investigative Subcommittee on November 4, 2009.⁷⁴⁴ Representative Rangel told the Subcommittee that he has known Karl and Faye Rodney for over twenty years.⁷⁴⁵ He stated that he did not know them intimately and but came in contact with them once or twice per year.⁷⁴⁶ Representative Rangel stated that, outside of the annual conferences, he may have seen them at events in New York.⁷⁴⁷ He said he has not met with them officially.⁷⁴⁸ He knows the Rodneys have contacted his New York district office on occasion.⁷⁴⁹ He knows of their daughter, Michele Rodney, but has never met her.⁷⁵⁰

Representative Rangel told the Subcommittee that he had not seen the sponsor form⁷⁵¹ for the 2007 conference before the investigation.⁷⁵² He also stated that he did not see the traveler form⁷⁵³ for the 2007 conference.⁷⁵⁴ Representative Rangel told the Subcommittee that he did not sign the form but that a member of his staff signed it on his behalf.⁷⁵⁵ He also stated that he did not authorize anyone to sign his name specifically, but George Dalley, Representative Rangel's former Chief of Staff, had permission to sign his name to documents on his behalf.⁷⁵⁶ Representative Ran-

⁷³⁷ *Id.* at 23.

⁷³⁸ *Id.*

⁷³⁹ *Id.* at 34.

⁷⁴⁰ *Id.*

⁷⁴¹ *Id.* at 34–35.

⁷⁴² *Id.*

⁷⁴³ *Id.*

⁷⁴⁴ Rangel Tr. at 4.

⁷⁴⁵ *Id.* at 6.

⁷⁴⁶ *Id.*

⁷⁴⁷ *Id.*

⁷⁴⁸ *Id.*

⁷⁴⁹ *Id.* at 7.

⁷⁵⁰ *Id.*

⁷⁵¹ See Exhibit 67.

⁷⁵² Rangel Tr. at 11–12.

⁷⁵³ See Exhibit 109.

⁷⁵⁴ Rangel Tr. at 13.

⁷⁵⁵ *Id.* 13–14.

⁷⁵⁶ *Id.* at 14–15.

gel further stated he did not see the Post-Travel Disclosure Form⁷⁵⁷ filed for the 2007 conference but that Mr. Dalley would have filled it in and signed his name to it.⁷⁵⁸ Representative Rangel knew it was Mr. Dalley who had filled out the form because he had been with Representative Rangel for about thirty years and Representative Rangel recognized his handwriting.⁷⁵⁹

Representative Rangel did not recall having a meeting with Karl and Faye Rodney regarding holding an event for visiting Caribbean ministers in New York.⁷⁶⁰ He was shown a memorandum⁷⁶¹ written by Karl Rodney and forwarded to Mr. Dalley to memorialize the meeting, but still did not recall ever having had such a meeting.⁷⁶² He stated he had spoken to the Rodneys about some of the issues in the memorandum, but that other information in the memorandum was new to him.⁷⁶³

Representative Rangel stated there were several derogatory news articles written about him and his association with the Foundation, and that caused him some concern before the 2008 conference.⁷⁶⁴ He initially decided not to attend the 2008 conference.⁷⁶⁵ He further told the Subcommittee that he did not recall a memorandum written by Michelle Sherwood⁷⁶⁶—who he identified as a lawyer in his New York office—that discussed the conference and the New York Post article.⁷⁶⁷ Representative Rangel stated he decided to attend the conference without staff because of his position in Congress.⁷⁶⁸

Representative Rangel was asked if he was aware of any corporate sponsor of the conferences and he stated he was not.⁷⁶⁹ He also told the Subcommittee that he did not read another memorandum⁷⁷⁰ written by Michelle Sherwood that discussed Faye Rodney and her contact with Representative Rangel's New York district office.⁷⁷¹ In that memorandum, which is addressed to Representative Rangel, Ms. Sherwood wrote that Faye Rodney called Representative Rangel's district office and was agitated that HSBC Bank had decided to withdraw its support to the 2008 conference.⁷⁷² The memorandum states that HSBC's decision to withdraw support was the result of the negative press about the conference and that Mrs. Rodney was concerned that other sponsors might withdraw their support as well.⁷⁷³ In the memorandum, Ms. Sherwood mentions that AT&T was continuing its support.⁷⁷⁴ Representative Rangel stated he did not see the memorandum and opined that George Dalley may have received it.⁷⁷⁵ He also stated

⁷⁵⁷ See Exhibit 110.

⁷⁵⁸ Rangel Tr. at 15.

⁷⁵⁹ *Id.*

⁷⁶⁰ *Id.* at 15–16.

⁷⁶¹ See Exhibit 111.

⁷⁶² Rangel Tr. at 15–16.

⁷⁶³ *Id.*

⁷⁶⁴ *Id.* at 18–19.

⁷⁶⁵ *Id.* at 19.

⁷⁶⁶ See Exhibit 112.

⁷⁶⁷ Rangel Tr. at 19–22.

⁷⁶⁸ *Id.* at 19.

⁷⁶⁹ *Id.* at 20.

⁷⁷⁰ See Exhibit 84.

⁷⁷¹ Rangel Tr. at 21–22.

⁷⁷² See Exhibit 84.

⁷⁷³ *Id.*

⁷⁷⁴ *Id.*

⁷⁷⁵ Rangel Tr. at 21.

that he did not know what HSBC Bank was.⁷⁷⁶ Representative Rangel denied discussing the matter with any Member or his staff.⁷⁷⁷ He further denied recommending any of the actions suggested by Ms. Sherwood in the memo.⁷⁷⁸

Representative Rangel reviewed the Post-Travel Disclosure Form⁷⁷⁹ for the 2008 conference and acknowledged that he signed and dated the form prior to its submission to the Clerk's office.⁷⁸⁰ He stated that it was his opinion that the information for the expenses on the form came from the Foundation.⁷⁸¹ He did not know who typed the information onto the form.⁷⁸²

Representative Rangel was also shown solicitation letters⁷⁸³ from the Carib News Foundation that indicated a carbon copy had been sent to him.⁷⁸⁴ He stated that he had never seen those letters before and did not know why his name would appear on them.⁷⁸⁵

IV. FINDINGS

A. COMMITTEE APPROVAL OF THE 2007 AND 2008 CARIB NEWS FOUNDATION MULTI-NATIONAL BUSINESS CONFERENCES

1. Travel Regulations

A House Member or employee may accept reimbursement “for necessary transportation, lodging, and related expenses for travel to a meeting, speaking engagement, factfinding trip, or similar event in connection with the duties of such individual as an officeholder” when the payment (including payment in kind) “is from a private source other than a registered lobbyist or agent of a foreign principal or a private entity that retains or employs registered lobbyists or agents of a foreign principal,” except in certain, limited circumstances, if such individual: a) in the case of an employee, receives advance authorization from the employee’s employing authority, and b) discloses the expenses reimbursed or to be reimbursed, along with the travel authorization, to the Office of the Clerk within 15 days after the travel is completed.⁷⁸⁶ All House invitees must obtain “prior approval” from the Standards Committee before accepting reimbursement for officially-connected travel expenses from a private source.⁷⁸⁷

No registered lobbyist or agent of a foreign principal may be a private source for the payment of travel expenses.⁷⁸⁸ Any other “private source” may sponsor a trip, except that private sources, other than institutions of higher education, that retain or employ

⁷⁷⁶ *Id.*

⁷⁷⁷ *Id.* at 21.

⁷⁷⁸ *Id.* at 22.

⁷⁷⁹ See Exhibit 113.

⁷⁸⁰ Rangel Tr. at 26–27.

⁷⁸¹ *Id.* at 27.

⁷⁸² *Id.* at 28.

⁷⁸³ See Exhibits 36–37.

⁷⁸⁴ Rangel Tr. at 30.

⁷⁸⁵ *Id.* at 30–31.

⁷⁸⁶ H. Rule XXV, cl. 5(b)(1).

⁷⁸⁷ H. Rule XXV, cl. 5(d)(2). House rules deem reimbursement of travel expenses to a Member or employee to be “a reimbursement to the House and not a gift prohibited” by the gift rule when a reimbursement or a payment for travel expenses is received in accordance with the House’s travel rule and the Standards Committee’s travel regulations. H. Rule XXV, cl. 5(b)(1).

⁷⁸⁸ H. Rule XXV, cls. 5(a)(1)(A)(ii) and (b)(1)(A). The term “registered lobbyist” may include individuals required to register as lobbyists. Select Committee on Ethics, *Final Report*, H. Rpt. No. 95–1837, 74 (Jan. 3, 1979) (finding that the House adopted language relating to registered lobbyists based upon a recommendation relating to those required to register).

registered lobbyists or agents of a foreign principal may only be sponsors for one-day events.⁷⁸⁹

To be permissible, a private source⁷⁹⁰ must “both organize and conduct the trip, rather than merely pay for a trip that is in fact organized and conducted by someone else.”⁷⁹¹ A private source (i.e., sponsor) must have a “direct and immediate relationship with the event or location being visited.”⁷⁹²

The Standards Committee’s policy on permissible private sources served as a basis for the new travel rule. The policy pre-dated the adoption of the new travel rules in the 110th Congress.⁷⁹³ The language used in the new House rule closely tracked the language used in the Standards Committee policy.

The Standards Committee’s long established policy regarding permissible private sources for reimbursement of travel expenses is as follows:

The rule is concerned with the organization(s) or individual(s) that actually pay for travel. Thus, for example, where a non-profit organization pays for travel with donations that were earmarked, either formally or informally, for the trip, each such donor is deemed a “private source” for the trip and (1) must be publicly disclosed as a trip sponsor on the applicable travel disclosure forms and (2) may itself be required to satisfy the above standards [requiring “a direct and immediate relationship with the event or location being visited”] on proper sources of travel expenses.⁷⁹⁴

“In addition, the concept of the rule is that a private entity that pays for officially connected travel will both organize and conduct the trip, rather than merely pay for a trip that is in fact organized and conducted by someone else.”⁷⁹⁵

The Standards Committee has determined that “a major donor to a non-profit organization” must have “a significant role in organizing or conducting a trip to which the

⁷⁸⁹ H. Rule XXV, cl. 5(b)(1)(C).

⁷⁹⁰ Under the House travel rules, the test is whether private sources are funding any expenses, directly or indirectly, for travel connected to a Member’s or employee’s official duties. Comm. on Standards of Official Conduct, *Rules of the House of Representatives on Gifts and Travel* at 75 (Apr. 2000). The term sponsor is not used in the travel rule itself. Popularly, many use the term “sponsor” to identify private sources. However, the term “sponsor,” in the context of the House travel rule and the Standards Committee’s travel regulations, is properly used to distinguish permissible private sources from impermissible private sources. Comm. on Standards of Official Conduct, *Rules of the House of Representatives on Gifts and Travel* at 75 (Apr. 2000). As such, the term “sponsor” will be used herein to mean a permissible private source for travel expense reimbursement.

⁷⁹¹ Comm. on Standards of Official Conduct, “New Travel Rules for Officially-Connected Travel Paid for by a Private Source” (Mar. 14, 2007), reprinted in Comm. on Standards of Official Conduct, “Summary of Activities One Hundredth Tenth Congress,” H. Rpt. No. 110-938, 48 (Jan. 3, 2009) (citing Comm. on Standards of Official Conduct, *Rules of the House of Representatives on Gifts and Travel* at 76 (Apr. 2000)); see also Comm. on Standards of Official Conduct, *House Ethics Manual* at 97-98 (2008).

⁷⁹² Comm. on Standards of Official Conduct, *Rules of the House of Representatives on Gifts and Travel* at 75 (Apr. 2000) (citing Comm. on Standards of Official Conduct, *Investigation of Financial Transactions participated in and Gifts of Transportation Accepted by Representative Fernand J. St Germain*, H. Rpt. No. 100-46, 5-6 (Apr. 9, 1987)); see also Comm. on Standards of Official Conduct, *House Ethics Manual* at 97 (2008) (same).

⁷⁹³ See *Id.*

⁷⁹⁴ Comm. on Standards of Official Conduct, *Rules of the House of Representatives on Gifts and Travel* at 75 (Apr. 2000).

⁷⁹⁵ *Id.* at 76.

non-profit issues invitations.”⁷⁹⁶ “The rule requires that a private entity (or entities) that pays for officially-connected travel will organize and conduct the trip, rather than merely pay for a trip that is in fact organized and conducted by another entity.”⁷⁹⁷

The House travel rule requires each private source (i.e., sponsor) to certify, before a House invitee accepts travel, that the “source will not accept from another source any funds earmarked directly or indirectly for the purpose of financing any aspect of the trip.”⁷⁹⁸ “Members and staff must provide the Standards Committee with written certification from the private source” that “no earmarked funds from another source for any aspect of the trip were accepted.”⁷⁹⁹ “Expenses may not be accepted from a source that has merely donated monetary or in-kind support to the trip but does not have a significant role in organizing and conducting the trip.”⁸⁰⁰

Each private source must provide its written certification in item 3 of the Private Sponsor Travel Certification Form.⁸⁰¹ Item 3 asks the sponsor to “represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip.”⁸⁰² The instructions for item 3 indicate:

*3. I represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip: All financial contributors to the trip must qualify as sponsors and should be listed as a sponsor in response to Question 1 [requiring identification of “Sponsor(s) (who will be paying for the trip)”. Check the box to indicate that no such outside funding has been accepted.*⁸⁰³

The Standards Committee has long held that “a major donor to a non-profit [sic] organization” may be considered a private source.⁸⁰⁴ Where it “has a significant role in organizing or conducting a trip to which the non-profit [sic] issues invitations,” a donor to a nonprofit entity would need to be listed as a sponsor of

⁷⁹⁶ *Id.* at 75, n. 89.

⁷⁹⁷ Comm. on Standards of Official Conduct, House Ethics Manual at 98 (2008).

⁷⁹⁸ H. Rule XXV, cl. 5(d)(1)(C).

⁷⁹⁹ Comm. on Standards of Official Conduct, “New Travel Rules for Officially-Connected Travel Paid for by a Private Source,” (Mar. 14, 2007), *reprinted in* Comm. on Standards of Official Conduct, “Summary of Activities One Hundred Tenth Congress,” H. Rpt. 110–938, 110th Cong., 2d Sess., 44, 47 (Jan. 3, 2009).

⁸⁰⁰ Comm. on Standards of Official Conduct, “Travel Guidelines and Regulations” (Feb. 20, 2007), *reprinted in* Comm. on Standards of Official Conduct, “Summary of Activities One Hundred Tenth Congress,” H. Rpt. 110–938, 110th Cong., 2d Sess., 34, 36 (Jan. 3, 2009).

⁸⁰¹ See Exhibits 68 and 90. See House Rule XXV(5)(d)(1)(C) which requires the Member, Delegate, resident Commissioner, officer, or employee of the House to provide the Standards Committee a written certification signed by the source or an officer of the source that the “source will not accept from any other source any funds earmarked directly or indirectly for the purpose of financing any aspect of the trip,” before accepting the trip. This requirement has been incorporated into the Private Sponsor Travel Certification Form developed by the Standards Committee and provided to potential sources.

⁸⁰² *Id.*

⁸⁰³ *Id.*

⁸⁰⁴ Comm. on Standards of Official Conduct, *Rules of the House of Representatives on Gifts and Travel* at 75, n. 89 (Apr. 2000); Comm. on Standards of Official Conduct, *House Ethics Manual* at 98, n. 16 (2008).

a trip.⁸⁰⁵ In such case, a donor may be considered to have “earmarked” funds “directly or indirectly for the purpose of financing any aspect of the trip.”⁸⁰⁶

A donor who has earmarked funds “directly or indirectly for the purpose of financing any aspect” of a trip who does not also have “a direct and immediate relationship with the event or location being visited” and “a significant role in organizing or conducting a trip to which the non-profit [sic] issues invitations,” is an impermissible source.⁸⁰⁷ In such a case, no other private source for the trip will be able to make the required certification for the trip.⁸⁰⁸ The Standards Committee would be unable to approve the trip.⁸⁰⁹

Thus, where there is evidence that a donor has provided funds (including in-kind donations) to a private source seeking to sponsor congressional travel, the Standards Committee must address the following issues:

1. Whether the donor is a private source for the trip, which may include the event to which the trip is intended to travel. That is, did or will the donor earmark funds directly or indirectly for the purpose of financing any aspect of the trip, including the event to which the travel is destined.⁸¹⁰

2. If so, whether the donor is a permissible source (i.e., sponsor) for the trip, which may include the event to which the trip is destined. That is, does the donor have: a) “a direct and immediate relationship with the event or location being visited;” and b) “a significant role in organizing or conducting a trip to which the non-profit issues invitations.”⁸¹¹

3. If the donor is a permissible source, whether it would be able to certify that it will not accept, or has not accepted, funds earmarked directly or indirectly for the purpose of financing any aspect of the trip.⁸¹²

Should a donor qualify as a permissible private source and be able to make the certification required of a trip sponsor, the Standards Committee would be able to approve the trip, assuming that all other factors permitting approval have been established.⁸¹³

As noted above, each private source must certify, among other things, “that the source will not accept from another source any funds earmarked directly or indirectly for the purpose of financing any aspect of the trip,” before a House Member or employee may accept reimbursement or payment of otherwise permissible travel expenses from the private source.⁸¹⁴ The private source must pro-

⁸⁰⁵ H. Rule XXV, cl. 5(d)(1)(C); see Comm. on Standards of Official Conduct, *Rules of the House of Representatives on Gifts and Travel* at 75 (Apr. 2000); Comm. on Standards of Official Conduct, *House Ethics Manual* at 97–98 (2008).

⁸⁰⁶ H. Rule XXV, cl. 5(d)(1)(C); see Comm. on Standards of Official Conduct, *Rules of the House of Representatives on Gifts and Travel* at 75 (Apr. 2000); Comm. on Standards of Official Conduct, *House Ethics Manual* at 97–98 (2008).

⁸⁰⁷ H. Rule XXV, cl. 5(d)(1)(C).

⁸⁰⁸ *Id.*

⁸⁰⁹ H. Rule XXV, cl. 5(d) (requiring House invitees to submit a written certification signed by the private source(s) as a precondition to approval of travel).

⁸¹⁰ Comm. on Standards of Official Conduct, *Rules of the House of Representatives on Gifts and Travel* at 75, n. 89 (Apr. 2000); Comm. on Standards of Official Conduct, *Recent Gift Rule Amendments*, (April 11, 2003).

⁸¹¹ Comm. on Standards of Official Conduct, *House Ethics Manual* at 97–98 (2008).

⁸¹² H. Rule XXV, cl. 5(d)(1)(C).

⁸¹³ H. Rule XXV, cl. 5(d).

⁸¹⁴ H. Rule XXV, cl. 5(d)(1)(C).

vide the certification to the invitee.⁸¹⁵ If the source is a corporate person, the certification must be signed by an officer of the source.⁸¹⁶

A “trip” encompasses all necessary aspects of travel by congressional participants.⁸¹⁷ It includes transportation, meals, lodging, and the event or events to which the congressional participants are destined.⁸¹⁸

The phrase, “the source will not accept from another source any funds earmarked directly or indirectly for the purpose of financing any aspect of the trip,” has never been defined in either the House rules or the Standards Committee’s published regulations or guidance. This has led to inconsistent interpretations of the phrase and confusion as to its meaning.⁸¹⁹

As indicated above, significant elements of the phrase derive from the Standards Committee’s longstanding guidance in place at the time the 110th Congress adopted the travel rules.⁸²⁰ Therefore, one may look to the Standards Committee’s previous guidance to aid in the interpretation of the phrase. To the extent the House selected different words, one may presume that the choice of different language was intentional.⁸²¹

Before the adoption of the travel rules in the 110th Congress, the Standards Committee’s previous guidance prohibited “donations that were earmarked, either *formally or informally*,” for payment of expenses of congressional participants.⁸²² The term “earmark” applies to funds⁸²³ given under an oral or written agreement that the funds will be used for specific purposes.⁸²⁴ Although never expressly stated, the plain import of the words “formal or informal” appears to prohibit donations where the donor and the donee have an explicit or tacit agreement that funds will be used for a trip.

The new travel rules adopted in the 110th Congress used the words “directly or indirectly,” rather than “formally or informally” to modify the term “earmarked.”⁸²⁵ This phraseology appears to broaden the scope of agreements that may be considered earmarks.⁸²⁶

⁸¹⁵ H. Rule XXV, cl. 5(d).

⁸¹⁶ *Id.*

⁸¹⁷ H. Rule XXV, cls. 5(b)(1)(A) (permitting acceptance of reimbursement for travel expenses for “travel to a meeting, speaking engagement, factfinding trip, or similar event”) and 5(b)(4) (defining necessary travel expenses).

⁸¹⁸ *Id.*

⁸¹⁹ Dixon Tr. at 26 (an earmark is a donation of money from a secondary entity to a primary entity to pay for congressional travel or help underwrite the costs of the event that Members are going to). Perl Tr. at 26 (the term “earmark” is not specifically defined but it is when money is given specifically for congressional travel). Olson Tr. at 9 (funds that are contributed for a specific purpose and not to the general fund of the sponsor).

⁸²⁰ See Comm. on Standards of Official Conduct, *Rules of the House of Representatives on Gifts and Travel* at 75 (Apr. 2000).

⁸²¹ See *United States v. Wong Kim Bo*, 472 F.2d 720, 722 (5th Cir. 1972) “[Where] Congress includes particular language in one section of a statute but omits it in another section of the same Act, it is generally presumed that Congress acts intentionally and purposely in the disparate inclusion or exclusion.”)

⁸²² Comm. on Standards of Official Conduct, *Rules of the House of Representatives on Gifts and Travel* at 75, n. 89 (Apr. 2000); Comm. on Standards of Official Conduct, *Recent Gift Rule Amendments*, (April 11, 2003). (emphasis added)

⁸²³ The term “funds” includes any funds used to reimburse a House traveler or finance any part or aspect of a trip, including in-kind contributions. See Comm. on Standards of Official Conduct, *House Ethics Manual* at 98.

⁸²⁴ See, e.g., “Earmarked grants to individuals, <http://www.irs.gov/charities/foundations/article/0,,id=137407,00.html> (last visited February 5, 2009).

⁸²⁵ H. Rule XXV, cl. 5(d)(1)(C).

⁸²⁶ *Id.*

In addition, the new travel rules also broadened the scope of the purposes for which an earmark may be made.⁸²⁷ The rule now applies to agreements to finance “any aspect” of a trip.⁸²⁸

The definition of a direct earmark is straightforward. Under its ordinary meaning, a direct earmark would exist where there is an oral or written agreement to use a donation or contribution for a specific, named purpose.⁸²⁹ Under Standards Committee precedent in place at the time the House adopted the new travel rules, an agreement could be considered an earmark if it was made “formally or informally.”⁸³⁰

The definition of an indirect earmark is far less clear and appears, in the absence of formal guidance, to have been interpreted inconsistently.⁸³¹ The natural import of the phrase “earmarked . . . indirectly” prohibits a donor from providing funds that the donor understands are to be applied by the recipient to finance any aspect or part of a trip.⁸³²

The Subcommittee finds that the donations by the corporations to Carib News, Inc. were funds directly earmarked for congressional travel. Mr. Rodney solicited contributions specifically for each conference in 2007 and 2008. The corporations that contributed specifically intended their contributions to be used for the 2007 and 2008 conferences. Thus, each donor had to independently qualify as a permissible source (i.e., sponsor) of the Members’ travel. In addition, the Government of Antigua made it clear that it was paying the Members’ cost of lodging for the 2007 conference. Such payment would have been impermissible under the FGDA.

2. Tax Prohibitions on Private Foundations

The Internal Revenue Code provides a tax penalty under the self-dealing provisions of § 4941 for payments made by private foundations to elected officials for travel.⁸³³ The statute also provides a tax penalty on the traveler if the traveler knew that the sponsor was a private foundation under the I.R.C. and knew that there was such a penalty provision.⁸³⁴ Prior to February 2009, it had not been the consistent practice of the Standards Committee to review the tax filing status of private sponsors. This issue was not one that the Standards Committee considered during its review of either the 2007 and 2008 conferences, nor is it an issue that is contemplated in the current House travel regulations.⁸³⁵ The Subcommittee understands that in 2009, the Standards Committee began reviewing privately sponsored travel by private foundations after it was raised during the review of an unrelated matter. Since

⁸²⁷ *Id.*

⁸²⁸ *Id.*

⁸²⁹ Internal Revenue Service, *Grants to Intermediaries*, <http://www.irs.gov/charities/foundations/article/0,,id=160666,00.html> (last visited February 16, 2010).

⁸³⁰ Comm. on Standards of Official Conduct, *Rules of the House of Representatives on Gifts and Travel* at 75 (Apr. 2000).

⁸³¹ Dixon Tr. at 26 (an earmark is a donation of money from a secondary entity to a primary entity to pay for congressional travel or help underwrite the costs of the event that Members are going to). Perl Tr. at 26 (the term “earmark” is not specifically defined but it is when money is given specifically for congressional travel). Olson Tr. at 9 (funds that are contributed for a specific purpose and not to the general fund of the sponsor).

⁸³² *Cf.* 26 CFR 53.4941(d)-1, (b)(2) (2009) (indirect self-dealing does not include grants made to intermediary organizations that the grantor knows or should know will be used for the benefit of government officials).

⁸³³ 26 U.S.C. § 4941(a). See Exhibit 78.

⁸³⁴ *Id.* at (a)(1).

⁸³⁵ Olson Tr. at 65, Perl Tr. at 21–22; see also, H. Rule XXV, cl. 5.

February 2009, the Standards Committee now verifies the tax status of private sponsors during its travel review process.⁸³⁶

The Subcommittee considered this issue in the instant matter. The Carib News Foundation is a private foundation as defined by the I.R.C.⁸³⁷ The Carib News Foundation was the only sponsor identified on the travel forms for the 2007 and 2008 conferences. However, the Subcommittee finds that it does not have to make a determination as to a potential violation of the I.R.C. in this matter based on the overwhelming evidence that the Foundation did not actually pay for or reimburse the travel costs of the Members who attended the 2007 and 2008 conferences. The evidence is clear that corporations contributed funds directly to each conference and not to the general fund of the Foundation. The evidence is also clear that once the corporations agreed to provide financial support, the invoices sent to the corporate contributors came from Carib News Inc., the publishing company.⁸³⁸ Additionally, the checks sent for the financial contributions, with the exception of the Verizon payment for the 2008 conference,⁸³⁹ were payable to Carib News, Inc., and not the Carib News Foundation.⁸⁴⁰ The Verizon check was payable to Carib News Charities. Finally, the checks submitted to the resorts for payment of the conference fees, lodging and meals, with only two exceptions, came from the Carib News bank accounts, and not the Foundation's bank account.⁸⁴¹ Karl Rodney also testified that the funds received from corporations for each conference were deposited in the Carib News "project account" and only a few were deposited into the Foundation's account.⁸⁴²

3. Contributions from Corporations that Retained or Employed Federally Registered Lobbyists

The Subcommittee finds that the two conferences were sponsored by corporations that employed or retained federally registered lobbyists. Regardless of the position taken by the Rodneys and Ms. Louis, these corporate entities funded both conferences and should have been identified to the Standards Committee as co-sponsors for these two events. The Foundation solicited and Carib News received donations from these corporations specifically for the purpose of holding these two conferences. As previously indicated in tables 1 and 4, these corporations contributed enough funds to pay the full costs for each conference. Carib News, Inc., sent invoices to the corporations for their contributions that specifically indicated the contributions were going to be used for the conferences and not the general fund of the Foundation.⁸⁴³

Because these corporations retained or employed federally registered lobbyists, the rules implemented in March 2007 limited attendance of the Members to a one-day event, with allowances for travel time to and from the conference, provided each entity quali-

⁸³⁶ Olson Tr. at 65, Perl Tr. at 21–22.

⁸³⁷ 26 U.S.C. § 509.

⁸³⁸ See Exhibits 48–55, 81, and 83.

⁸³⁹ See Exhibit 131.

⁸⁴⁰ See Exhibit 132.

⁸⁴¹ *Id.*

⁸⁴² Karl Rodney October 28, 2009, Tr. at 55.

⁸⁴³ See Exhibits 81 and 83.

fied individually as a sponsor.⁸⁴⁴ However, even though Standards Committee staff asked specific questions of the Rodneys, the Rodneys withheld the true nature of the corporate contributions from the Standards Committee during its review of the proposed travel. Had the Foundation disclosed the nature of these contributions during questioning by Standards Committee counsel, neither trip would have been authorized. Unfortunately, because the Standards Committee must rely on assertions and certifications made by potential sponsors, it is difficult to ascertain the true nature of funding for offers of travel by private sponsors.

4. Payments for Lodging from the Governments of Antigua and St. Maarten

Based on the agreement the Foundation had with the Government of Antigua, the government paid for the lodging of Members of Congress and other VIPs at the 2007 conference. The agreement was in effect at the time Ms. Louis submitted the sponsor forms to the Standards Committee and during the time Ms. Olson was inquiring about the trip sponsors. A foreign government may only pay for the travel of Members under Standards Committee Rules and the Foreign Gifts and Decorations Act (FGDA) if the trip takes place “entirely” outside the United States.⁸⁴⁵ Because the 2007 trip included travel from the United States, lodging in Antigua, and return travel to the United States, it would not have been authorized under Standards Committee Rules or the FGDA.⁸⁴⁶ Therefore, the 2007 conference would not have been approvable based on the agreement and subsequent payment by the Government of Antigua.

Because the lodging was paid for by a foreign government, the lodging should have also been reported in accordance with the FGDA to the Standards Committee.⁸⁴⁷ The FGDA, codified at 5 U.S.C. § 7342(c)(1)(B)(ii), allows for the acceptance of transportation, lodging and meals as provided for by the House of Representatives (for House Members and employees). The House allows receipt of travel expenses under regulations established by the Standards Committee. Section 6(e) of the Regulations for the Acceptance of Decorations and Gifts from Foreign Governments provides that:

A Member, officer or employee of the House may accept gifts of travel or expenses for travel taking place entirely outside of the United States offered by a foreign government when such travel or expenses for travel relate directly to the official duties of the Member, officer or employee. Gifts of travel or expenses for travel include food, lodging, transportation and entertainment relating to the official duties of the Member, officer or employee. This provision allows a Member, officer or employee to take advan-

⁸⁴⁴ Comm. on Standards of Official Conduct, *House Ethics Manual* at 96 (2008). See also Comm. on Standards of Official Conduct, *Travel Guidelines and Regulations*, at 4 (Feb. 20, 2007).

⁸⁴⁵ 5 U.S.C. § 7432(c)(1)(B)(ii). See also Comm. on Standards of Official Conduct, *Regulations for the Acceptance of Decorations and Gifts* § 6(e).

⁸⁴⁶ *Id.*

⁸⁴⁷ *Id.*

tage of opportunities such as for on-site inspection or fact-finding while in a foreign country.⁸⁴⁸

A spouse or dependent of a Member, officer, or employee of the House may accept such travel or expenses when accompanying the Member, officer, or employee of the House.⁸⁴⁹ Such travel or expenses for travel may not be accepted merely for the personal benefit, pleasure, enjoyment, or financial enrichment of the individual or individuals involved.⁸⁵⁰ The acceptance of any such travel or expenses for travel shall be reported within 30 days after acceptance to the Standards Committee, providing information required in section 7(b) of the regulations.⁸⁵¹ For the purposes of the regulations, travel or expenses for travel are deemed accepted upon departure from the donor country.

The payment by the Government of Antigua for the lodging expenses of the congressional travelers was impermissible under this regulation pursuant to the FGDA.⁸⁵² The lodging costs were part of the trip, which began when the Members departed the United States, and continued until they returned to the United States.⁸⁵³ Since the lodging was part of the planning and organization of the conference, it cannot be severed from the trip.⁸⁵⁴ The regulation allows payment for travel, lodging, meals, etc., for travel that takes place “entirely” outside the United States.⁸⁵⁵ Since the lodging was part of the trip, as evidenced by the lodging being reserved as part of the conference by the Foundation, the Government of Antigua could not pay for the costs for the congressional travelers under any provision of this regulation.⁸⁵⁶

The Subcommittee finds that the payment by the Government of Antigua for the Members’ lodging and meals would not have been permissible even if properly reported. However, because neither Mr. Rodney nor Ms. Louis notified the Members that their lodging was paid for by the Government of Antigua, the Members were not aware of the payment. Each Member told the Subcommittee that he or she believed the Foundation paid for their transportation and lodging as it was reported to them, and no one indicated he or she had reason to disbelieve or doubt the information provided to them by the Foundation.

The FGDA allows for “civil prosecution” of a government employee who “knowingly” fails to report a gift as required under section (h) of the Act.⁸⁵⁷ However, there is no evidence that the Members who attended the 2007 conference knew or should have known that their lodging was paid for by the Government of Antigua.⁸⁵⁸ Even so, because the payment by the Government of Antigua would have been impermissible under any circumstances, the Members

⁸⁴⁸ *Id.*

⁸⁴⁹ *Id.*

⁸⁵⁰ *Id.*

⁸⁵¹ *Id.*

⁸⁵² *Id.* See also Comm. on Standards of Official Conduct, *Regulations for the Acceptance of Decorations and Gifts* § 6(e).

⁸⁵³ See H. Rule XXV, cls. 5(b)(4) (defining aspects of a trip).

⁸⁵⁴ 5 U.S.C. § 7432(c)(1)(B)(ii).

⁸⁵⁵ *Id.*

⁸⁵⁶ See Exhibits 86, 89; see also 5 U.S.C. § 7432(c)(1)(B)(ii).

⁸⁵⁷ 5 U.S.C. § 7342(h).

⁸⁵⁸ See Thompson Tr. at 19–20; Clarke Tr. at 19–20; Christensen Tr. at 11.

would not have been allowed to accept these expenditures even if properly reported.⁸⁵⁹

Additionally, the Subcommittee understands from both Karl Rodney's and Patricia Louis' testimony that the same agreement was in effect for the 2008 conference, although there is no evidence that the Government of St. Maarten actually paid for the lodging used by Members in 2008.⁸⁶⁰ However, an email sent on September 28, 2008, from Helen Bayne, Sonesta Maho Beach and Resort General Manager, to Ms. Louis states that the Government of St. Maarten indicated it would be paying for a "select number of VIP rooms. . . ."⁸⁶¹ There is also a June 25, 2008, memorandum from Karl Rodney to Commissioner Sara Wescot-Williams that indicates the "local host committee" should use the "basic requirement as the basis for their planning."⁸⁶² The basic requirement requires the host government to pay for 25 rooms for "VIPs and members of Congress."⁸⁶³ Had this agreement been disclosed during the 2008 travel review process, the trip requests would have been denied based on this potential FGDA violation alone.⁸⁶⁴

B. TRAVEL TO AND ATTENDANCE AT THE 2007 AND 2008 MULTINATIONAL BUSINESS CONFERENCES BY REPRESENTATIVE BENNIE G. THOMPSON

Representative Thompson traveled to and attended both the 2007 conference in Antigua and 2008 conference in St. Maarten. His wife, Dr. London Thompson, accompanied him to both conferences. Representative Thompson believed that the Foundation paid for his and his wife's transportation, lodging, meals, and conference fees to attend both conferences. The information on the travel forms for each conference submitted by his office to the Standards Committee was based on information provided to his office by Karl Rodney and the Carib News Foundation. Representative Thompson provided sworn testimony to the Investigative Subcommittee regarding his attendance at both conferences.

On October 9, 2007, Representative Thompson's former scheduler, Megan Pittman, completed the traveler form on his behalf and submitted it to the Standards Committee for review prior to the 2007 conference.⁸⁶⁵ The sponsor form signed by Karl Rodney was attached to the traveler form.⁸⁶⁶ Both forms indicated that the Carib News Foundation was the only sponsor of the 2007 conference.

On October 16, 2007, the Standards Committee sent Representative Thompson a letter approving his travel to attend the conference sponsored by the Foundation based on the information provided to the Standards Committee by the Foundation.⁸⁶⁷ The

⁸⁵⁹ Comm. on Standards of Official Conduct, *Regulations for the Acceptance of Decorations and Gifts* § 6(e).

⁸⁶⁰ Karl Rodney December 1, 2009, Tr. at 121, and Louis Tr. at 55.

⁸⁶¹ See Exhibit 114.

⁸⁶² See Exhibit 115.

⁸⁶³ See Exhibit 87.

⁸⁶⁴ Comm. on Standards of Official Conduct, *Regulations for the Acceptance of Decorations and Gifts* § 6(e).

⁸⁶⁵ See Exhibit 93.

⁸⁶⁶ See Exhibit 67.

⁸⁶⁷ See Exhibit 95.

Standards Committee also approved Representative Thompson's wife to accompany him.

On November 29, 2007, Representative Thompson properly filed his Post-Travel Disclosure Form with the Office of the Clerk.⁸⁶⁸ According to his Post-Travel Disclosure Form, Representative Thompson traveled to attend the 2007 conference from November 10 through November 12, 2007, with his wife, Dr. London Thompson. The information entered on the form was provided to him by the Foundation. Representative Thompson testified that he reviewed and signed the form prior to its submission to the Clerk's office.

On October 16, 2008, Representative Thompson's former scheduler, Jennifer Jimerson, completed and signed the traveler form⁸⁶⁹ and submitted it to the Standards Committee along with the sponsor form⁸⁷⁰ signed by Karl Rodney for review for the 2008 conference.⁸⁷¹ The sponsor form indicated that the Foundation was the only sponsor for the 2008 conference.⁸⁷² The traveler form indicated that Representative Thompson's wife would accompany him to the conference.⁸⁷³

On October 20, 2008, the Standards Committee sent Representative Thompson a letter approving travel to St. Maarten to attend the conference sponsored by the Foundation for both him and his wife.⁸⁷⁴ The approval was based on information provided to both Representative Thompson and the Standards Committee regarding the sponsor to the 2008 conference. Representative Thompson filed his post-travel form⁸⁷⁵ with the House Clerk's office on December 5, 2008. According to the post-travel form, Representative Thompson traveled from November 6 through November 9, 2008, with his wife, to attend the 2008 conference.⁸⁷⁶

Mr. Thompson testified that he was not aware of any corporation contributing to either the 2007 or the 2008 conferences, and if he had noticed any banners with corporate logos, it would not have raised any flags.

The Investigative Subcommittee conducted an extensive and thorough investigation, which included interviews of witnesses and review of documents and records provided by Representative Thompson, the Carib News Foundation, corporations identified as contributors to the conferences in 2007 and 2008, and Unique Vacations. The Subcommittee found no evidence that Representative Bennie G. Thompson knew that any entity other than the Carib News Foundation sponsored any part of Representative Thompson's travel to attend either the 2007 or 2008 conference.

From the documents submitted and reviewed by the Standards Committee for both the 2007 and 2008 conferences, the Subcommittee finds that Representative Thompson followed the procedures in place at the time for pre-travel approval and did, in fact, receive approval from the Standards Committee to attend both the 2007 and 2008 conferences. He was therefore entitled to rely upon the Standards Committee's approval of his trip under Standards

⁸⁶⁸ See Exhibit 96.

⁸⁶⁹ See Exhibit 94.

⁸⁷⁰ See Exhibit 90.

⁸⁷¹ Avant Tr. at 7-8.

⁸⁷² See Exhibit 90.

⁸⁷³ See Exhibit 94.

⁸⁷⁴ See Exhibit 116.

⁸⁷⁵ See Exhibit 97.

⁸⁷⁶ See Exhibit 97.

Committee Rule 3(k), which provides, “The Committee may take no adverse action in regard to any conduct that has been undertaken in reliance on a written opinion if the conduct conforms to the specific facts addressed in the opinion.”⁸⁷⁷ The Standards Committee’s opinion regarding Representative Thompson’s travel was based on facts believed to be true by both Representative Thompson and the Standards Committee at the time of the opinion. Reliance upon a Standards Committee advisory opinion, including travel advisory opinions, shields the Member or House staffer from the Standards Committee taking any adverse action against him or her in regard to conduct undertaken by that person in good faith reliance upon the advisory opinion.⁸⁷⁸ However, the Member or House staffer is only shielded so long as he or she has presented a complete and accurate statement of all material facts relied upon in the advisory opinion, and the proposed conduct in practice conforms with the information provided, as addressed in the opinion.⁸⁷⁹

Even though Representative Thompson properly followed procedures and received approvals from the Standards Committee to attend both conferences, the payments for travel expenses made on his and his wife’s behalf were impermissible. Payments for lodging by a foreign government would have been impermissible under the FGDA and Standards Committee Rules.⁸⁸⁰ Additionally, because corporations that retained or employed lobbyists contributed funds specifically in support of the conference, but did not participate in the planning or organization of the trip as required under House travel regulations, the trip would have been impermissible on that basis as well.⁸⁸¹ Under any of these scenarios, Representative Thompson unknowingly received impermissible payments for travel and lodging to attend the 2007 and 2008 conferences.

Because Representative Thompson did not have any knowledge of the true source of funding for these two trips, the Subcommittee does not find that he violated any law, House Rule, regulation, or any other standard of conduct. However, because he received impermissible gifts proscribed by House Rules, other remedies are necessary. Representative Thompson should return or pay for any gifts or benefits he received that were impermissible. These would include the airline tickets donated by American Airlines for the 2007 conference, transportation costs paid by the Foundation, conference fees, and lodging and meals paid for by the governments of Antigua and St. Maarten or the Foundation.

C. TRAVEL TO AND ATTENDANCE AT THE 2007 AND 2008 MULTINATIONAL BUSINESS CONFERENCES BY DELEGATE DONNA CHRISTENSEN

Delegate Christensen traveled to and attended both the 2007 conference in Antigua and the 2008 conference in St. Maarten. The information on the travel forms submitted in both years by her office to the Standards Committee was based on the information re-

⁸⁷⁷ Committee Rule 3(k).

⁸⁷⁸ Committee Rule 3(k).

⁸⁷⁹ Committee Rule 3(k).

⁸⁸⁰ 5 U.S.C. § 7432(c)(1)(B)(ii). See also Comm. on Standards of Official Conduct, *Regulations for the Acceptance of Decorations and Gifts* 6(e).

⁸⁸¹ Comm. on Standards of Official Conduct, *House Ethics Manual* at 96–97 (2008). See also Comm. on Standards of Official Conduct, *Travel Guidelines and Regulations*, at 4 (Feb. 20, 2007).

ceived from Karl Rodney and the Carib News Foundation. Delegate Christensen provided sworn testimony to the Investigative Subcommittee regarding her attendance at both conferences.

On October 5, 2007, Delegate Christensen's scheduler, Shelley Thomas, completed and signed the traveler form⁸⁸² on Delegate Christensen's behalf and submitted it to the Standards Committee for review for the 2007 conference.⁸⁸³ Attached to the traveler form was the sponsor form signed by Karl Rodney.⁸⁸⁴ Both forms identified the Carib News Foundation as the only sponsor for the 2007 conference held in Antigua. Ms. Thomas told the Subcommittee staff that she relied on the information provided on the sponsor form in completing the traveler form.⁸⁸⁵

On October 16, 2007, the Standards Committee sent a letter to Delegate Christensen approving her travel to attend the 2007 conference sponsored by the Carib News Foundation.⁸⁸⁶ Her child, Christian, was also approved to attend as requested on her traveler form.

On December 6, 2007, Delegate Christensen filed her Post-Travel Disclosure Form with the House Clerk's office.⁸⁸⁷ Her form indicated that she traveled from November 8 through November 9, 2007, to attend the 2007 conference and that she was unaccompanied.⁸⁸⁸ Delegate Christensen testified that although she had obtained approval to bring her son, she traveled alone to the 2007 conference.⁸⁸⁹ She also testified that she completed and signed the form prior to its submission to the Clerk.⁸⁹⁰

On September 19, 2008, Delegate Christensen's scheduler, Shelley Thomas, completed and signed the traveler form⁸⁹¹ on Delegate Christensen's behalf and submitted it to the Standards Committee for review for the 2008 conference.⁸⁹² Attached to the traveler form was the sponsor form signed by Karl Rodney.⁸⁹³ Both forms indicated that the Carib News Foundation was the only sponsor of the 2008 conference held in St. Maarten. Ms. Thomas told Subcommittee staff that she relied on the information provided on the sponsor form to complete the traveler form.⁸⁹⁴

On October 16, 2008, the Standards Committee sent a letter to Delegate Christensen approving her travel to attend the 2008 conference in St. Maarten accompanied by her spouse.⁸⁹⁵ On December 22, 2008, Delegate Christensen submitted her Post-Travel Disclosure Form for the travel to the House Clerk's office.⁸⁹⁶ Her post-travel form indicates Delegate Christensen traveled from November 6 through November 8, 2008, to attend the 2008 conference and was unaccompanied.⁸⁹⁷

⁸⁸² See Exhibit 102.

⁸⁸³ Thomas Tr. at 9.

⁸⁸⁴ See Exhibit 67.

⁸⁸⁵ Thomas Tr. at 9.

⁸⁸⁶ See Exhibit 117.

⁸⁸⁷ See Exhibit 104.

⁸⁸⁸ See Exhibit 104.

⁸⁸⁹ Christensen Tr. at 10.

⁸⁹⁰ *Id.* at 14.

⁸⁹¹ See Exhibit 103.

⁸⁹² Christensen Tr. at 18.

⁸⁹³ See Exhibit 90.

⁸⁹⁴ Thomas Tr. at 9–10.

⁸⁹⁵ See Exhibit 118.

⁸⁹⁶ See Exhibit 105.

⁸⁹⁷ See Exhibit 105.

Delegate Christensen testified that she did not know if any specific corporation contributed to the conference.⁸⁹⁸ She believed that corporations may have donated to the Foundation generally.⁸⁹⁹

From the documents submitted and reviewed by the Standards Committee for both the 2007 and 2008 conferences, the Subcommittee finds that Delegate Christensen followed the procedures in place at the time for pre-travel approval and did, in fact, receive approval from the Standards Committee to attend both the 2007 and 2008 conferences. She was therefore entitled to rely upon the Standards Committee's approval of her trip under Standards Committee Rule 3(k), which provides, "The Committee may take no adverse action in regard to any conduct that has been undertaken in reliance on a written opinion if the conduct conforms to the specific facts addressed in the opinion."⁹⁰⁰ The Standards Committee's opinion regarding Delegate Christensen was based on facts believed to be true by both Delegate Christensen and the Standards Committee at the time of the opinion. Reliance upon a Standards Committee advisory opinion, including travel advisory opinions, shields the Member or House staffer from the Standards Committee taking any adverse action against him or her in regard to conduct undertaken by that person in good faith reliance upon the advisory opinion.⁹⁰¹ However, the Member or House staffer is only shielded so long as he or she has presented a complete and accurate statement of all material facts relied upon in the advisory opinion, and the proposed conduct in practice conforms to the information provided, as addressed in the opinion.⁹⁰²

However, even though Delegate Christensen properly followed procedures and received approvals from the Standards Committee to attend both conferences, the payments made on her behalf were impermissible. Payments for lodging by a foreign government would have been impermissible under the FGDA and Standards Committee Rules.⁹⁰³ Additionally, because corporations that retained or employed lobbyists contributed funds specifically for the conference, but did not participate in the planning or organization of the trip as required under House travel regulations, the trip would have been impermissible.⁹⁰⁴ Under any of these scenarios, Delegate Christensen unknowingly received impermissible payments for travel and lodging to attend the 2007 and 2008 conferences.

Because Delegate Christensen did not have any knowledge of the true source of funding for these two trips, the Subcommittee finds that she did not violate any law, House Rule, regulation, or any other standard of conduct. However, because she received impermissible gifts proscribed by House Rules, other remedies are necessary. Delegate Christensen should return or pay for any gifts or benefits she received that were impermissible. These would include the airline tickets donated by American Airlines for the 2007 con-

⁸⁹⁸ Christensen Tr. at 21.

⁸⁹⁹ *Id.*

⁹⁰⁰ Committee Rule 3(k).

⁹⁰¹ Committee Rule 3(k).

⁹⁰² Committee Rule 3(k).

⁹⁰³ 5 U.S.C. § 7432(c)(1)(B)(ii). *See also* Comm. on Standards of Official Conduct, *Regulations for the Acceptance of Decorations and Gifts* § 6(e).

⁹⁰⁴ Comm. on Standards of Official Conduct, *House Ethics Manual* at 96–97 (2008). *See also* Comm. on Standards of Official Conduct, *Travel Guidelines and Regulations*, at 4 (Feb. 20, 2007).

ference, transportation costs paid by the Foundation, conference fees, and lodging and meals paid for by the governments of Antigua and St. Maarten or the Foundation.

D. TRAVEL TO AND ATTENDANCE AT THE 2007 MULTI-NATIONAL BUSINESS CONFERENCE BY REPRESENTATIVE YVETTE CLARKE

Representative Clarke traveled to and attended the 2007 conference in Antigua. The information on the travel forms submitted by her office to the Standards Committee was based on the information received from Karl Rodney and the Carib News Foundation. Representative Clarke provided sworn testimony to the Investigative Subcommittee regarding her attendance at the 2007 conference in Antigua.

On October 4, 2007, Representative Clarke's then Chief of Staff, Ian Campbell, completed and signed the traveler form⁹⁰⁵ on her behalf and submitted it to the Standards Committee for review for the 2007 conference.⁹⁰⁶ Attached to the traveler form was the sponsor form signed by Karl Rodney.⁹⁰⁷ Both forms identified the Carib News Foundation as the only sponsor for the 2007 conference held in Antigua. Mr. Campbell told Subcommittee staff that he relied on the information provided on the sponsor form in completing the traveler form.⁹⁰⁸ He further stated that the Foundation had held the conference for several years and they were the only sponsor of the event.⁹⁰⁹

On October 16, 2007, the Standards Committee sent a letter to Representative Clarke approving her travel to attend the 2007 conference sponsored by the Carib News Foundation.⁹¹⁰

On November 19, 2007, Representative Clarke filed her Post-Travel Disclosure Form with the House Clerk's office.⁹¹¹ Representative Clarke verified she spent only two nights and one full day at the conference.⁹¹² On her post-travel form, Representative Clarke indicated she traveled to the 2007 conference from November 10 through November 12, 2007. She also testified that her staff completed and signed the form on her behalf prior to its submission to the Clerk.⁹¹³ She stated that she reviewed and discussed the form prior to its submission. Representative Clarke testified that she did not know if any corporations donated to the conference.⁹¹⁴

From the documents submitted and reviewed by the Standards Committee for the 2007 conference, the Subcommittee finds that Representative Clarke followed the procedures in place at the time for pre-travel approval and did, in fact, receive approval from the Standards Committee to attend the 2007 conference. She was therefore entitled to rely upon the Standards Committee's approval of her trip under Standards Committee Rule 3(k), which provides, "The Committee may take no adverse action in regard to any conduct that has been undertaken in reliance on a written opinion if the conduct conforms to the specific facts addressed in the opin-

⁹⁰⁵ See Exhibit 99.

⁹⁰⁶ Campbell Tr. at 6.

⁹⁰⁷ See Exhibit 67.

⁹⁰⁸ Campbell Tr. at 11.

⁹⁰⁹ Campbell Tr. at 8.

⁹¹⁰ See Exhibit 119.

⁹¹¹ See Exhibit 100.

⁹¹² *Id.* See also Clarke Tr. at 23.

⁹¹³ Clarke Tr. at 23.

⁹¹⁴ Clarke Tr. at 18-19.

ion.”⁹¹⁵ The Standards Committee’s opinion regarding Representative Clarke was based on facts believed to be true by both Representative Clarke and the Standards Committee at the time of the opinion. Reliance upon a Standards Committee advisory opinion, including travel advisory opinions, shields the Member or House staffer from the Standards Committee taking any adverse action against him or her in regard to conduct undertaken by that person in good faith reliance upon the advisory opinion.⁹¹⁶ However, the Member or House staffer is only shielded so long as he or she has presented a complete and accurate statement of all material facts relied upon in the advisory opinion, and the proposed conduct in practice conforms with the information provided, as addressed in the opinion.⁹¹⁷

Even though Representative Clarke properly followed procedures and received approvals from the Standards Committee to attend both conferences, the payments made on her behalf were impermissible. Payments for lodging by a foreign government would have been impermissible under the FGDA and Standards Committee Rules.⁹¹⁸ Additionally, because corporations that retained or employed lobbyists contributed funds specifically in support of the conference, but did not participate in the planning or organization of the trip as required under House travel regulations, the trip would have been impermissible.⁹¹⁹ Under any of these scenarios, Representative Clarke unknowingly received an impermissible payment for travel and lodging to attend the 2007 conference.

Because Representative Clarke did not have any knowledge of the true source of funding for this trip, the Subcommittee does not find that she violated any law, House Rule, regulation, or any other standard of conduct. However, because she received impermissible gifts proscribed by House Rules, other remedies are necessary. Representative Clarke should return or pay for any gifts or benefits she received that were impermissible. These gifts or benefits would include the airline tickets donated by American Airlines for the 2007 conference, transportation costs paid by the Foundation, conference fees, and lodging and meals paid for by the governments of Antigua or the Foundation.

E. TRAVEL TO AND ATTENDANCE AT THE 2008 MULTI-NATIONAL BUSINESS CONFERENCE BY REPRESENTATIVE DONALD PAYNE

Representative Payne traveled to and attended the 2008 conference in St. Maarten. The information on the travel forms submitted by his office to the Standards Committee was based on the information received from Karl Rodney and the Carib News Foundation. Representative Payne provided sworn testimony to the Investigative Subcommittee regarding his attendance at the 2008 conference in St. Maarten.

⁹¹⁵ Committee Rule 3(k).

⁹¹⁶ Committee Rule 3(k).

⁹¹⁷ Committee Rule 3(k).

⁹¹⁸ 5 U.S.C. § 7432(c)(1)(B)(ii). See also Comm. on Standards of Official Conduct, *Regulations for the Acceptance of Decorations and Gifts* § 6(e).

⁹¹⁹ Comm. on Standards of Official Conduct, *House Ethics Manual* at 96–97 (2008). See also Comm. on Standards of Official Conduct, *Travel Guidelines and Regulations*, at 4 (Feb. 20, 2007).

On October 15, 2008, Representative Payne’s scheduler, Darlene Murray, completed and signed the traveler form⁹²⁰ on Representative Payne’s behalf and faxed it to the Standards Committee for review for the 2008 conference.⁹²¹ Attached to the traveler form was the sponsor form signed by Karl Rodney.⁹²² Both forms identified the Carib News Foundation as the only sponsor for the 2008 conference held in St. Maarten. Ms. Murray told Subcommittee staff that she relied on the sponsor form in completing the traveler form.⁹²³

On October 16, 2008, the Standards Committee sent a letter to Representative Payne approving his travel to attend the 2008 conference sponsored by the Carib News Foundation with an additional two days after the conference that Representative Payne was paying for out of personal funds.⁹²⁴

On November 19, 2008, Representative Payne filed his Post-Travel Disclosure Form with the House Clerk’s office.⁹²⁵ Representative Payne verified he spent a total of five days in St. Maarten, two of which he paid for out of personal funds.⁹²⁶ His post-travel form indicates he traveled from November 6 through November 11, 2008, and his stay from November 10 to November 11, 2008, was at his personal expense. He testified that Ms. Murray completed and likely signed the post-travel form on his behalf prior to its submission to the clerk.⁹²⁷ He stated that he reviewed the form prior to its submission.⁹²⁸ Representative Payne testified that he did not know if any corporations donated to the conference.⁹²⁹

Representative Payne did not recall any remarks “thanking” the sponsors at the conference but thought that corporate sponsors contributed to the Foundation generally and not to the conference specifically.⁹³⁰

From the documents submitted and reviewed by the Standards Committee for the 2008 conference, the Subcommittee finds that Representative Payne followed the procedures in place at the time for pre-travel approval and did, in fact, receive approval from the Standards Committee to attend the 2008 conference. He was therefore entitled to rely upon the Standards Committee’s approval of his trip under Standards Committee Rule 3(k), which provides, “The Committee may take no adverse action in regard to any conduct that has been undertaken in reliance on a written opinion if the conduct conforms to the specific facts addressed in the opinion.”⁹³¹ The Standards Committee’s opinion regarding Representative Payne was based on facts believed to be true by both Representative Payne and the Standards Committee at the time of the opinion. Reliance upon a Standards Committee advisory opinion, including travel advisory opinions, shields the Member or House staffer from the Standards Committee taking any adverse action against him or her in regard to conduct undertaken by that person

⁹²⁰ See Exhibit 106.

⁹²¹ Murray Tr. at 14.

⁹²² See Exhibit 90.

⁹²³ Murray Tr. at 15.

⁹²⁴ See Exhibit 107.

⁹²⁵ See Exhibit 108.

⁹²⁶ Payne Tr. at 14.

⁹²⁷ Payne Tr. at 26.

⁹²⁸ *Id.*

⁹²⁹ Payne Tr. at 21–22.

⁹³⁰ *Id.*

⁹³¹ Committee Rule 3(k).

in good faith reliance upon the advisory opinion.⁹³² However, the Member or House staffer is only shielded so long as he or she has presented a complete and accurate statement of all material facts relied upon in the advisory opinion, and the proposed conduct in practice conforms with the information provided, as addressed in the opinion.⁹³³

However, even though Representative Payne properly followed procedures and received approvals from the Standards Committee to attend the 2008 conference, the payments made on his behalf were impermissible. Payments for lodging by a foreign government would have been impermissible under the FGDA and Standards Committee Rules.⁹³⁴ Additionally, because corporations that retained or employed lobbyists contributed funds specifically in support of the conference, but did not participate in the planning or organization of the trip as required under House travel regulations, the trip would have been impermissible.⁹³⁵ Under any of these scenarios, Representative Payne unknowingly received an impermissible payment for travel and lodging to attend the 2008 conference.

Because Representative Payne did not have any knowledge of the true source of funding for this trip, the Subcommittee does not find that he violated any law, House Rule, regulation, or any other standard of conduct. However, because he received impermissible gifts proscribed by House Rules, other remedies are necessary. Representative Payne should return or pay for any gifts or benefits he received that were impermissible. These gifts or benefits would include transportation costs, conference fees, lodging, meals and any other costs paid on his behalf by the Foundation, or lodging and meals paid for by the Government of St. Maarten.

F. TRAVEL TO AND ATTENDANCE AT THE 2008 MULTI-NATIONAL BUSINESS CONFERENCE BY REPRESENTATIVE CAROLYN CHEEKS KILPATRICK

Representative Kilpatrick traveled to and attended the 2008 conference in St. Maarten. The information on the travel forms submitted by her office to the Standards Committee on October 3, 2008, was based on the information received from Karl Rodney and the Carib News Foundation. Representative Kilpatrick provided sworn testimony to the Investigative Subcommittee regarding her attendance at the 2008 conference in St. Maarten.

On October 15, 2008, Representative Kilpatrick's scheduler, Roxanne Scott, completed the traveler form⁹³⁶ and faxed it to the Standards Committee for review for the 2008 conference.⁹³⁷ Representative Kilpatrick told the Subcommittee that she reviewed and signed the form before its submission.⁹³⁸ Attached to the traveler form was the sponsor form signed by Karl Rodney.⁹³⁹ Both forms identified the Carib News Foundation as the only sponsor for

⁹³² Committee Rule 3(k).

⁹³³ Committee Rule 3(k).

⁹³⁴ 5 U.S.C. § 7432(c)(1)(B)(ii). See also Comm. on Standards of Official Conduct, *Regulations for the Acceptance of Decorations and Gifts* §6(e).

⁹³⁵ Comm. on Standards of Official Conduct, *House Ethics Manual* at 96–97 (2008). See also Comm. on Standards of Official Conduct, *Travel Guidelines and Regulations*, at 4 (Feb. 20, 2007).

⁹³⁶ See Exhibit 126.

⁹³⁷ Scott Tr. at 8.

⁹³⁸ Kilpatrick Tr. at 18.

⁹³⁹ See Exhibit 90.

the 2008 conference held in St. Maarten. Ms. Scott told Subcommittee counsel that she relied on the information provided on the sponsor form in completing the traveler form.⁹⁴⁰

On October 16, 2008, the Standards Committee sent a letter to Representative Kilpatrick approving her travel to attend the 2008 conference sponsored by the Carib News Foundation.⁹⁴¹ Representative Kilpatrick subsequently notified the Standards Committee that she would be accompanied by her sister, Marsha Cheeks, by submitting a revised traveler form.⁹⁴² The Standards Committee sent a letter on October 21, 2008, approving both her and her sister's travel to attend the 2008 conference.⁹⁴³

On November 20, 2008, Representative Kilpatrick filed her Post-Travel Disclosure Form with the House Clerk's office.⁹⁴⁴ Representative Kilpatrick verified she spent a total of three days in St. Maarten, traveling from November 6, 2008, through November 9, 2008. She indicated on the post-travel form that she was accompanied by her sister, Marsha Cheeks, whose expenses were also paid for by the Foundation.⁹⁴⁵ During her testimony before the Subcommittee, she also noted that her daughter and infant granddaughter were also present at the conference, but she had paid for their expenses out of personal funds.⁹⁴⁶ She testified that Ms. Scott completed the form, which Representative Kilpatrick reviewed and signed prior to its submission to the Clerk.⁹⁴⁷ Representative Kilpatrick testified that she did not know if any corporations contributed to the conference and even though she noted corporate logos on banners and materials, she believed they contributed to the Foundation generally and not specifically to the conference or for travel.⁹⁴⁸ She also stated that when she thanked "sponsors" she was referring to the support they provided to the "caucus" and not the conference.⁹⁴⁹

Q. Were they at any time identified as sponsors for the event?

A. You've got my quote as Chair of the Caucus, bringing greetings. I think of them as sponsors. Again, in my mind, partners, as supporters of the—which I think is a synonym for sponsors—are supporters. I wasn't thinking like our Ethics rules now say someone who gives it or helps plan it and all that.

I was thinking more of representing our caucus, thanking them for working with us to get to know one another. Heads of states are there. You know, it is really a good conference for us in the work that we do here in the Congress. That is how I look at it.

If you said I used the wording—and I did—I meant more as supporters of Carib as well as supporters of us, not knowing at all what they did for that particular conference.

⁹⁴⁰ Scott Tr. at 9.

⁹⁴¹ See Exhibit 128.

⁹⁴² See Exhibit 127.

⁹⁴³ See Exhibit 121.

⁹⁴⁴ See Exhibit 98.

⁹⁴⁵ See Exhibit 98.

⁹⁴⁶ Kilpatrick Tr. at 22.

⁹⁴⁷ Kilpatrick Tr. at 17–18.

⁹⁴⁸ Kilpatrick Tr. at 27.

⁹⁴⁹ Kilpatrick Tr. at 20.

Q. So when you used the term “sponsors,” it wasn’t meant that you knew they had funded the conference or anything?

A. I had no idea, no.

From the documents submitted and reviewed by the Standards Committee for the 2008 conference, the Subcommittee finds that Representative Kilpatrick followed the procedures in place at the time for pre-travel approval and did, in fact, receive approval from the Standards Committee to attend the 2008 conference. However, even though Representative Kilpatrick properly followed procedures and received approvals from the Standards Committee to attend both conferences, the payments made on her behalf were impermissible. Payments for lodging by a foreign government would have been impermissible under the FGDA and Standards Committee Rules.⁹⁵⁰ Additionally, because corporations that retained or employed lobbyists contributed funds specifically in support of the conference, but did not participate in the planning or organization of the trip as required under House travel regulations, the trip would have been impermissible.⁹⁵¹ Under any of these scenarios, Representative Kilpatrick unknowingly received an impermissible payment for travel and lodging to attend the 2008 conference.

Because Representative Kilpatrick did not have any knowledge of the true source of funding for this trip, the Subcommittee does not find that she violated any law, House Rule, regulation, or any other standard of conduct. She was therefore entitled to rely upon the Standards Committee’s approval of her trip under Standards Committee Rule 3(k), which provides, “The Committee may take no adverse action in regard to any conduct that has been undertaken in reliance on a written opinion if the conduct conforms to the specific facts addressed in the opinion.”⁹⁵² The Standards Committee’s opinion regarding Representative Kilpatrick was based on facts believed to be true by both Representative Kilpatrick and the Standards Committee at the time of the opinion. Reliance upon a Standards Committee advisory opinion, including travel advisory opinions, shields the Member or House staffer from the Standards Committee taking any adverse action against him or her in regard to conduct undertaken by that person in good faith reliance upon the advisory opinion.⁹⁵³ However, the Member or House staffer is only shielded so long as he or she has presented a complete and accurate statement of all material facts relied upon in the advisory opinion, and the proposed conduct in practice conforms to the information provided, as addressed in the opinion.⁹⁵⁴

However, because she received impermissible gifts proscribed by House Rules, other remedies are necessary. Representative Kilpatrick should return or pay for any gifts or benefits she received that were impermissible. These gifts or benefits would include transportation costs, conference fees, lodging, meals and any other

⁹⁵⁰ 5 U.S.C. § 7432(c)(1)(B)(ii). See also Comm. on Standards of Official Conduct, *Regulations for the Acceptance of Decorations and Gifts* § 6(e).

⁹⁵¹ Comm. on Standards of Official Conduct, *House Ethics Manual* at 96–97 (2008). See also Comm. on Standards of Official Conduct, *Travel Guidelines and Regulations*, at 4 (Feb. 20, 2007).

⁹⁵² Committee Rule 3(k).

⁹⁵³ Committee Rule 3(k).

⁹⁵⁴ Committee Rule 3(k).

costs paid on his behalf by the Foundation, or lodging and meals paid for by the Government of St. Maarten.

G. TRAVEL TO THE 2007 AND 2008 MULTI-NATIONAL BUSINESS
CONFERENCES BY REPRESENTATIVE CHARLES RANGEL

Representative Rangel attended both the 2007 conference in Antigua and the 2008 conference in St. Maarten. The Foundation paid for the transportation, lodging, meals, and conference fees for him to attend each conference. The information on the travel forms for each conference submitted by his office to the Standards Committee was based on information provided to his office by Karl Rodney and the Carib News Foundation. Representative Rangel provided sworn testimony to the Investigative Subcommittee regarding his attendance at both conferences.

On October 5, 2007, Representative Rangel's former Chief of Staff, George Dalley, completed and signed the traveler form⁹⁵⁵ on Representative Rangel's behalf and submitted it to the Standards Committee for review prior to the 2007 conference.⁹⁵⁶ The form signed by Karl Rodney was attached to the traveler form.⁹⁵⁷ Both forms indicated that the Carib News Foundation was the only sponsor of the 2007 conference.

On October 16, 2007, the Standards Committee sent Representative Rangel a letter approving his travel to attend the conference sponsored by the Foundation based on the information provided to the Standards Committee by the Foundation.⁹⁵⁸ The Standards Committee also approved Representative Rangel's son, Steven Rangel, to accompany him. However, his son did not travel to the conference.

On September 30, 2008, Representative Rangel filed his Post-Travel Disclosure Form for the 2007 conference with the Office of the Clerk.⁹⁵⁹ This form was not submitted as required within 15 days after travel. Mr. Dalley explained that they forgot to file it and once notified of that fact they then filed the form.⁹⁶⁰ Representative Rangel's post-travel form indicated he traveled from November 10, 2007, through November 11, 2007, to attend the 2007 conference. The information provided on the form was provided to Mr. Dalley by the Foundation.⁹⁶¹ Representative Rangel indicated that he had not seen the form prior to it being included in the OCE referral materials provided to him by the Standards Committee.⁹⁶² Representative Rangel testified that he only stayed one or two days at the 2007 conference.⁹⁶³ According to his post-travel disclosure, he stayed two days in 2007.⁹⁶⁴

In October 2008, Mr. Dalley completed and signed the travel form⁹⁶⁵ and submitted it to the Standards Committee along with the form signed by Karl Rodney for review for the 2008 con-

⁹⁵⁵ See Exhibit 109.

⁹⁵⁶ Dalley Tr. at 13-14.

⁹⁵⁷ See Exhibit 67.

⁹⁵⁸ See Exhibit 122.

⁹⁵⁹ See Exhibit 69.

⁹⁶⁰ Dalley Tr. at 19.

⁹⁶¹ Dalley Tr. at 19-20.

⁹⁶² Rangel Tr. at 13.

⁹⁶³ Rangel Tr. at 17-18.

⁹⁶⁴ See Exhibit 109.

⁹⁶⁵ See Exhibit 124.

ference.⁹⁶⁶ The sponsor form indicated that the Foundation was the only sponsor for the 2008 conference.

On October 23, 2008, the Standards Committee sent Representative Rangel a letter approving his travel to St. Maarten to attend the conference sponsored by the Foundation.⁹⁶⁷ The approval was based on information provided to both Representative Rangel and the Standards Committee regarding the sponsor to the 2008 conference. On November 23, 2008, Mr. Dalley completed the Post-Travel Disclosure Form⁹⁶⁸ and signed Mr. Rangel's name.⁹⁶⁹ The form was then filed with the House Clerk's office.

Mr. Rangel testified that he was not aware of any corporations contributing to either of the conferences.⁹⁷⁰ Mr. Rangel also stated he did not notice any corporate logos or banners at either conference.⁹⁷¹ However, documents provided to the Standards Committee by Representative Rangel included a memorandum written on September 25, 2008, by Michelle Sherwood—Representative Rangel's counsel in his New York district office discussed corporate sponsors for the 2008 conference.⁹⁷² The memorandum was addressed to Representative Rangel, requested direction from him, and discussed a telephone conversation between Ms. Sherwood and Faye Rodney. The memorandum indicated that Mrs. Rodney was very upset that HSBC Bank, one of the contributors to the 2008 conference, was withdrawing its support due to a negative *New York Post* article regarding the 2007 conference.⁹⁷³ The memorandum indicated that Ms. Sherwood discussed the issue with George Dalley and other Members of Representative Rangel's New York staff.⁹⁷⁴ The memorandum also discussed that other sponsors such as AT&T were "holding strong" but Ms. Rodney was concerned that AT&T may also withdraw its financial support to the conference because of the negative press regarding the 2007 conference.⁹⁷⁵ Ms. Sherwood provided some suggested actions to regain HSBC Bank's support and asked for Representative Rangel's guidance.⁹⁷⁶ HSBC Bank subsequently provided support to the 2008 conference.⁹⁷⁷

Representative Rangel told the Subcommittee he did not recall the memorandum and did not know what HSBC Bank was.⁹⁷⁸ He also stated he never provided any guidance for dealing with the issue.⁹⁷⁹ Mr. Rangel was also shown the Foundation's letter to American Airlines regarding tickets for the 2007 conference which contained a line indicating a copy was sent to Representative Rangel.⁹⁸⁰ Representative Rangel testified that he had never seen the letter and did not know why he would have been copied.⁹⁸¹

⁹⁶⁶ Dalley Tr. at 51–52.

⁹⁶⁷ See Exhibit 123.

⁹⁶⁸ See Exhibit 113.

⁹⁶⁹ Dalley Tr. at 53.

⁹⁷⁰ Rangel Tr. at 20.

⁹⁷¹ *Id.*

⁹⁷² See Exhibit 84.

⁹⁷³ *Id.*

⁹⁷⁴ *Id.*

⁹⁷⁵ *Id.*

⁹⁷⁶ *Id.*

⁹⁷⁷ See Exhibit 85.

⁹⁷⁸ Rangel Tr. at 21.

⁹⁷⁹ Rangel Tr. at 21–22.

⁹⁸⁰ See Exhibit 36.

⁹⁸¹ Rangel Tr. at 30.

It is clear from the memorandum written by Ms. Sherwood that both she and Mr. Dalley were aware of AT&T's and HSBC Bank's sponsorship of the 2008 conference. Additionally, Mr. Dalley completed and signed the travel forms on behalf of Representative Rangel for the 2008 conference. The forms indicated that the Carib News Foundation was the only sponsor of the 2008 conference. Mr. Dalley knew that the information on the travel forms was incorrect and should have listed the other sponsors. Mr. Dalley's knowledge that HSBC Bank and AT&T were sponsors to the 2008 conference should have been shared with Representative Rangel. It is unproven whether Representative Rangel in fact received the memorandum written by Ms. Sherwood regarding Mrs. Rodney's concerns about HSBC Bank. However, the Investigative Subcommittee also cannot prove that Representative Rangel did not receive this memorandum.

Ms. Sherwood had also prepared a memorandum on October 23, 2008, addressed to Representative Rangel discussing an article in the *New York Post* critical of the 2007 conference.⁹⁸² In this memorandum, she discussed the allegations in the *Post* article regarding corporate sponsorship of the 2007 conference.⁹⁸³ Representative Rangel told the Subcommittee that he initially was not going to attend the 2008 conference because of the negative press surrounding the conference, but subsequently decided to attend.⁹⁸⁴ It is likewise unproven that Representative Rangel received this memorandum. However, the Investigative Subcommittee likewise cannot prove that Representative Rangel did not receive this memorandum.

Based on previous decisions by the Standards Committee, it is unnecessary to determine whether Representative Rangel received the memoranda and therefore had actual knowledge that the conferences were being sponsored by or had multiple sources of funding.⁹⁸⁵ It is clear that his staff knew that the conferences were supported by corporate donations.⁹⁸⁶

Members are responsible for the knowledge and acts acquired or committed by their staff within the course and scope of their employment.⁹⁸⁷ In *Gingrich*, the Standards Committee held Representative Gingrich responsible for letters mailed by his staff in violation of the Franking Privilege despite his lack of personal knowledge.⁹⁸⁸ Furthermore, in *Shuster*, the Standards Committee stated, "Members of the House are ultimately responsible for ensuring their offices function in accordance with applicable standards. In this regard, Members must not only ensure that their offices comply with appropriate standards, but also take account in the manner in which their actions may be perceived."⁹⁸⁹ Representative Shuster's former Chief of Staff, after she left his employment, continued to provide advisory and scheduling services to

⁹⁸² See Exhibit 112.

⁹⁸³ *Id.*

⁹⁸⁴ Rangel Tr. at 19.

⁹⁸⁵ Comm. On Standards of Official Conduct, *In the Matter of Representative Austin J. Murphy* (hereinafter *Murphy*), Report 100-485, 100th Congress, 1st Sess. (1987); Comm. On Standards of Official Conduct, *Statement of the Standards Committee on Standards of Official Conduct Regarding Complaints Against Representative Newt Gingrich* (hereinafter *Gingrich 1990*), 101st Congress (March 8, 1990); Comm. On Standards of Official Conduct, *In the Matter of Representative E.G. "Bud" Shuster* (hereinafter *Shuster*), Report 106-979, 106th Congress, 2nd Sess. (2000).

⁹⁸⁶ See Exhibits 84 and 112.

⁹⁸⁷ *Murphy* at 8 and 85.

⁹⁸⁸ *Gingrich* at 57, 60, and 78.

⁹⁸⁹ *Shuster* at 49.

the House office. Representative Shuster condoned her conduct through his inaction.⁹⁹⁰

Representative Murphy's response to the allegations that he allowed a law firm to use House supplies and property was that he did not know or did not approve of the use.⁹⁹¹ Counsel to the Select Committee argued that "a Member must bear responsibility for the actions which are under his ultimate authority and should not escape liability by attempting to blame his staff."⁹⁹² The Committee agreed with this position and held that Representative Murphy was "responsible to the House for assuring that resources provided in support of his official duties are applied to the proper purposes," regardless of his claim that he had no knowledge of their use.⁹⁹³

The Committee's long-standing precedent has support in decisions of the courts, as well. In federal criminal pattern jury instructions, the various circuits provide instructions related to the criminal liability of corporations that arise out of the conduct of their agents. For example, the Eighth Circuit's Criminal Pattern Jury Instruction 5.04 provides,

A corporation may be found guilty of a criminal offense.

A corporation can act only through its agents—that is, its directors, officers, employees, and other persons authorized to act for it.

To find a corporate defendant guilty you must find beyond a reasonable doubt that:

One, each element of the crime charged against the corporation was committed by one or more of its agents; and

Two, in committing those acts the agent[s] intended, at least in part, to benefit the corporation; and

Three, each act was within the scope of employment of the agent who committed it.

For an act to be within the scope of an agent's employment it must relate directly to the performance of the agent's general duties for the corporation. It is not necessary that the act itself have been authorized by the corporation.

If an agent was acting within the scope of his employment, the fact that the agent's act was illegal, contrary to his employer's instructions or against the corporation's policies will not relieve the corporation of responsibility for it.⁹⁹⁴

* * *

Additionally, the U.S. Court of Appeals for the First Circuit discussed the issue regarding a corporation's liability based on the collective knowledge of its employees in its decision in *U.S. v. Bank of New England*, holding that a corporation cannot:

plead innocence by asserting that the information obtained by several employees was not acquired by any one individual who then would have to comprehend its full import.

⁹⁹⁰ *Id.* at 3F–3G.

⁹⁹¹ *Murphy* at 4.

⁹⁹² *Id.* at 85.

⁹⁹³ *Murphy* at 5, 8.

⁹⁹⁴ Jud. Comm. On Model Jury Instructions for the Eighth Circuit, Manual of Model Criminal Jury Instructions, http://www.juryinstructions.ca8.uscourts.gov/criminal_instructions.htm (last visited February 4, 2010).

Rather, the corporation is considered to have acquired the collective knowledge of its employees and is held responsible for their failure to act accordingly.⁹⁹⁵

The First Circuit also found that the trial judge properly instructed the jury that it could infer knowledge if the “defendant consciously avoided learning about the reporting requirements.”⁹⁹⁶ In this case, the Bank of New England was prosecuted for criminal violations of the Bank Records and Foreign Transactions Act (BRFTA) for failing to report certain transactions. Bank employees were prosecuted for structuring deposits in a manner to avoid triggering the currency reporting requirements under BRFTA.⁹⁹⁷ The trial judge gave the following instruction to the jury regarding collective knowledge:

In addition, however, you have to look at the bank as an institution. As such, its knowledge is the sum of the knowledge of all of the employees. That is, the bank’s knowledge is the totality of what all of the employees know within the scope of their employment. So, if Employee A knows one facet of the currency reporting requirement, B knows another facet of it, and C a third facet of it, the bank knows them all. So if you find that an employee within the scope of his employment knew that CTRs had to be filed, even if multiple checks are used, the bank is deemed to know it. The bank is also deemed to know it if each of several employees knew a part of that requirement and the sum of what the separate employees knew amounted to knowledge that such a requirement existed.⁹⁹⁸

The trial judge also gave the jury instructions on the issue of specific intent and how it could be applied to the bank through the conduct of the bank’s employees. The trial judge instructed the jury:

There is a similar double business with respect to the concept of willfulness with respect to the bank. In deciding whether the bank acted willfully, again you have to look first at the conduct of all employees and officers, and, second, at what the bank did or did not do as an institution. The bank is deemed to have acted willfully if one of its employees in the scope of his employment acted willfully. So, if you find that an employee willfully failed to do what was necessary to file these reports, then that is deemed to be the act of the bank, and the bank is deemed to have willfully failed to file.

Alternatively, the bank as an institution has certain responsibilities; as an organization, it has certain responsibilities. And you will have to determine whether the bank as an organization consciously avoided learning

⁹⁹⁵ 821 F. 2d 844 (1st Cir. 1987). See also, e.g., *Spurr v. United States*, 174 U.S. 728 (1899) (approving a jury instruction that wilful ignorance of a fact satisfies a mens rea of knowledge when there is a specific statutory duty to ascertain the fact); *People v. Brown*, 16 P. 1 (Cal. 1887) (using wilful ignorance to infer actual knowledge); *Bosley v. Davies*, 1 Q.B.D. 84 (1875) (holding that wilful ignorance satisfies the mens rea of “suffering” illegal activity).

⁹⁹⁶ 821 F.2d 844, 855.

⁹⁹⁷ Id. at 847.

⁹⁹⁸ Id.

about and observing CTR requirements. The Government to prove the bank guilty on this theory, has to show that its failure to file was the result of some flagrant organizational indifference. In this connection, you should look at the evidence as to the bank's effort, if any, to inform its employees of the law; its effort to check on their compliance; its response to various bits of information that it got in August and September of '84 and February of '85; its policies, and how it carried out its stated policies.

If you find that the Government has proven with respect to any transaction either that an employee within the scope of his employment willfully failed to file a required report or that the bank was flagrantly indifferent to its obligations, then you may find that the bank has willfully failed to file the required reports.⁹⁹⁹

The First Circuit found that the collective knowledge instruction was "entirely appropriate" and that the "knowledge obtained by corporate employees acting within the scope of their employment is imputed to the corporation."¹⁰⁰⁰

Additionally, according to the Restatement of Agency regarding actual or constructive knowledge of an agent:¹⁰⁰¹

The rule charging the principal with an agent's knowledge is not necessarily restricted to matters of which the agent has actual knowledge, and according to some courts, the principal is charged with the knowledge of that which the agent, by ordinary care, could have known,¹⁰⁰² especially where the agent has received sufficient information to awaken inquiry.¹⁰⁰³ According to other courts, however, the principal is not affected by knowledge which the agent should have acquired in the performance of his or her duties unless the principal has a duty to others that care will be exercised in obtaining information.¹⁰⁰⁴ Also, in this regard, the Restatement Second of Agency provides that the principal is not affected by the knowledge which an agent should have acquired in the performance of the agent's duties to the principal or to others, except where the principal or master has a duty to others that care shall be exercised in obtaining information.¹⁰⁰⁵

The law imputes the agent's knowledge to the principal, even if the principal does not actually know what the agent knows.¹⁰⁰⁶

Therefore, based upon the Standards Committee's longstanding precedent regarding the responsibilities Members have for the conduct and actions of their staff, the Subcommittee finds that it would not well serve the House as an institution to allow its Mem-

⁹⁹⁹ *Id.* at 855.

¹⁰⁰⁰ *Id.*

¹⁰⁰¹ 3 Am Jur 2d Agency 277.

¹⁰⁰² *Fleming v. U.S.*, 648 F.2d 1122, 61 A.L.R. Fed. 307 (7th Cir. 1981); *Neal v. Pender-Hyman Hardware Co.*, 122 N.C. 104, 29 S.E. 96 (1898).

¹⁰⁰³ *Wittenbrock v. Parker*, 102 Cal. 93, 36 P. 374 (1894).

¹⁰⁰⁴ *State v. One (1) Certain 1969 Ford Van, V. J. N.-E15AHD98177*, 191 N.W.2d 662 (Iowa 1971); *Linwood State Bank v. Lientz*, 413 S.W.2d 248 (Mo. 1967).

¹⁰⁰⁵ Restatement of Agency 277.

¹⁰⁰⁶ *AutoXchange.com, Inc. v. Dreyer and Reinbold, Inc.*, 816 N.E.2d 40 (Ind. Ct. App. 2004), as amended, (Nov. 19, 2004).

bers to escape responsibility by delegating authority to their staff to take actions and hide behind their lack of knowledge of the facts surrounding those actions. Members choose their own staff and should expect their staff to provide them with all the information necessary to carry out their responsibilities, as well as to stay within the boundaries established by law, regulations, and standards of conduct. Many times Members act through the actions of their staff and, therefore, should be held liable for those actions in certain circumstances. In this case, Representative Rangel acted when he attended the conference through Mr. Dalley's actions of completing and signing the forms necessary for the approval to attend the conference. Representative Rangel authorized his Chief of Staff, Mr. Dalley, to complete and sign the traveler forms on his behalf. Representative Rangel, therefore, can and should be held responsible for the knowledge Mr. Dalley and Ms. Sherwood had regarding the corporate sponsors.

As a result of these precedents, Representative Rangel must be held responsible for the knowledge of his employees acting within the scope of their employment. Because of this imputed knowledge, the Investigative Subcommittee finds that Representative Rangel knowingly accepted an impermissible gift of travel and that he failed to comply with the House travel regulation's requirement that he indicate these additional sponsors on his post-travel disclosures.

Therefore, after an extensive and thorough investigation, including interviews of witnesses and the review of records and documents provided by Representative Rangel, Carib News, Inc., and the Carib News Foundation, various corporations and other entities that participated in the 2007 and 2008 conferences, the Investigative Subcommittee finds that Representative Charles Rangel should have ensured that the sponsor form and the traveler form had, at a minimum, properly identified HSBC Bank and AT&T as corporate sponsors for the 2008 Carib News Multi-National Business Conference prior to their submission to the Standards Committee. The Subcommittee believes that, because Mr. Dalley was aware of the corporate sponsorship for the 2008 conference, and the fact that the *New York Post* article had caused Representative Rangel to consider not attending the 2008 conference, both Mr. Dalley and Representative Rangel had a duty to inquire further into the funding of the 2008 conference before submitting the traveler form to the Standards Committee.

In addition to the memorandum written by Michelle Sherwood before the 2008 conference, which indicated knowledge of corporate sponsorship for the 2008 conference, the Subcommittee also found evidence that indicated Representative Rangel was aware of corporate sponsorships to previous conferences when it was not prohibited under House rules preceding the 2007 rule changes. On June 5, 2006, Mr. Dalley submitted a request on behalf of Representative Rangel seeking the Standards Committee's advice. The request contained a draft letter that Representative Rangel wanted to send to potential corporate sponsors. Representative Rangel asked for the Standards Committee's advice regarding his being able to solicit "private sector support and sponsorship" for the 2006 Multi-National Business Conference. Based on the request from Mr. Dalley, on behalf of Representative Rangel, it is clear that Mr.

Dalley was aware of corporate sponsorship for the conferences as early as 2006. This knowledge should have been considered when Mr. Dalley prepared the travel request for the 2007 conference on behalf of Representative Rangel.¹⁰⁰⁷

Therefore, the Subcommittee finds that Mr. Dalley's submission to the Standards Committee was false or misleading in both 2007 and 2008. Mr. Dalley submitted these forms in the performance of his official duties as Representative Rangel's Chief of Staff, and with full authorization from Representative Rangel.

If the true information regarding the corporate sponsorship of the 2007 and 2008 conferences had been disclosed to the Standards Committee, the trips would likely not have been approved. Therefore, Representative Rangel knowingly received impermissible gifts of travel to attend the 2007 and 2008 conferences in violation of House Rule XXIII, Clause 4 and House Rule XXV. Additionally, Representative Rangel did not adhere to the spirit and letter of the rules by knowingly allowing the incorrect or misleading information regarding the trip sponsors to be submitted to the Standards Committee in violation of House Rule XXIII, clause 2.

Additionally, payments for lodging by a foreign government would have been impermissible under the FGDA and Standards Committee Rules.¹⁰⁰⁸ Finally, because corporations that retained or employed lobbyists contributed funds specifically in support of the conference, but did not participate in the planning or organization of the trip as required under House travel regulations, the trip would have been impermissible.¹⁰⁰⁹ Under any of these scenarios, Representative Rangel received impermissible payments for travel and lodging to attend the 2007 and 2008 conferences.

H. COMMUNICATION BETWEEN DAWN KELLY MOBLEY AND THE CARIB NEWS FOUNDATION REGARDING THE 2007 CONFERENCE

Beginning in March 2007, Dawn Kelley Mobley was employed by the late Representative Stephanie Tubbs Jones and served as her designated counsel (shared staff) to the Standards Committee. House Rule X, clause 9(a)(2)(A) allows for the use of "shared staff" on committees. As defined in the Rule, shared staff are those staff members who are not paid exclusively by the committee. Pursuant to House Rule XI, clause 3(g)(4), the Chair and Ranking Member of the Standards Committee "may appoint one individual from their personal staff to perform service for the committee." The designated counsel positions came about as a result of revisions to the House and Standards Committee rules by the Ethics Reform Task Force in June 1997. One suggested revision required all Standards Committee staff to be non-partisan. However, the designated counsels are not required to be non-partisan, except in the performance of their duties for the Standards Committee.¹⁰¹⁰

Traditionally, the role of the designated counsels has been to review letters, subpoenas, reports, travel approval letters, advisory

¹⁰⁰⁷ Most of the sponsors of the 2006 conference also contributed to the 2007 and 2008 conferences.

¹⁰⁰⁸ 5 U.S.C. § 7432(c)(1)(B)(ii). See also Comm. on Standards of Official Conduct, *Regulations for the Acceptance of Decorations and Gifts* § 6(e).

¹⁰⁰⁹ Comm. on Standards of Official Conduct, *House Ethics Manual* at 96–97 (2008). See also Comm. on Standards of Official Conduct, *Travel Guidelines and Regulations*, at 4 (Feb. 20, 2007).

¹⁰¹⁰ Standards Committee Rule 7(c).

opinions, and other documents prepared by Standards Committee staff before they are submitted to the Chair and Ranking Member for signature.¹⁰¹¹ Their interaction with Standards Committee staff usually involves asking and answering questions on behalf of the Chair and/or Ranking Member or providing information to the Chair and Ranking Member regarding issues of interest.¹⁰¹² They have normally not intervened or communicated with private sponsors for congressional travel or other events that needed prior Standards Committee review. Historically, all such communications were the responsibility of the Standards Committee's professional staff who was assigned to work on the particular issue. Until a few years ago, the designated counsels did not reside in Standards Committee space, but worked from their respective Members' offices. Eventually the designated counsels were given temporary desk space to use while they were at the Standards Committee, but most of their time was spent outside Standards Committee space. The use of temporary desks evolved into more permanent desk space by the time Ms. Mobley was hired as the Chair's designee, to correspond with the increased workload of the Standards Committee as a result of the new travel rules requiring the Standards Committee to approve privately-sponsored travel in advance. Ms. Mobley worked from Standards Committee space more than previous designees, but it was still on a part-time basis.

Currently, the designees work full-time in Standards Committee space and have their own offices. This is reflective of an ever-increasing workload as a result of both Standards Committee initiated reviews of matters, as well as referred matters from the newly established Office of Congressional Ethics. Designated counsels have day-to-day interaction with the professional staff as a result of the increased workload from pre-travel reviews, training requirements for House staff, and reviews of conduct related issues. As with Ms. Mobley's influence over the Standards Committee staff's review of the Carib News conference in 2007, the potential for involvement in the professional staff's work is even greater with such a permanent placement of the designees in the Standards Committee space, alongside the professional staff.

House rules require that shared staff receive a portion of their salaries from the Standard Committees to which they are assigned and the rest from their Member's representation allowance. They are required to work in each location based on the percentage of the salary they receive. Currently, the shared staff received over 95% of their salary from Standards Committee funds, meaning that 95% of their work must be related to Standards Committee business. At this ratio, the designees are almost full-time employees of the Standards Committee.

The utilization of the designated counsels to conduct Standards Committee business changed with the introduction of Ms. Mobley as the Chair's designee and the changes made to the travel rules in 2007. Karl Rodney, Faye Rodney, and Patricia Louis each stated that Representative Tubbs Jones told them that because of the new rules regarding privately sponsored travel, which took effect in March 2007, she had assigned Dawn Kelly Mobley to be their point

¹⁰¹¹ O'Reilly Tr. at 21-22.

¹⁰¹² O'Reilly Tr. at 21-22.

of contact to help them understand and follow the new rules and procedures for the 2007 conference.¹⁰¹³ Ms. Mobley told the Subcommittee that she was unaware of that communication.¹⁰¹⁴ In a letter she sent to the Subcommittee, Ms. Mobley stated that she only became involved in the 2007 conference at the request of Mr. O'Reilly.¹⁰¹⁵

The Subcommittee reviewed numerous emails that indicated Ms. Mobley was in initial contact with the Foundation and remained in communication, even after Susan Olson was assigned to review the travel request. Ms. Mobley received and sent several emails that were not addressed to Ms. Olson, and did not make Ms. Olson aware of those emails or the continuing communications with Carib News.¹⁰¹⁶ In some emails, Ms. Louis solicited Ms. Mobley's advice about how to respond to Ms. Olson's queries.¹⁰¹⁷ Ms. Mobley provided guidance to Ms. Louis about the definition of sponsors that contradicted the definition given by Ms. Olson.¹⁰¹⁸ In some emails, Ms. Mobley referenced telephone conversations she had with the Foundation. When asked by Subcommittee counsel of these conversations, Ms. Mobley did not recall many of these communications.¹⁰¹⁹

Additionally, Ms. Mobley provided Patricia Louis with internal Standards Committee communications without proper authority from the Standards Committee. Ms. Mobley acknowledged that she sent a copy of an internal email sent by Ms. Olson to her and Mr. O'Reilly that was sent to Ms. Louis.¹⁰²⁰ This email contained Ms. Olson's analysis and concerns regarding Ms. Louis' response regarding the 2007 corporate sponsors. This was an internal Standards Committee communication covered under Standards Committee Rule 7(d), which states in part, "Members and staff of the Committee shall not disclose to any person or organization outside the Committee, unless authorized by the Committee, any information regarding the Committee's or a subcommittee's investigative, adjudicatory or other proceedings. . . ." ¹⁰²¹ Ms. Mobley explained that she provided this email to Ms. Louis to assist her in understanding Ms. Olson's concerns.¹⁰²² However, Ms. Mobley never received authorization from the Standards Committee to release this email as required.

After a thorough review of the communications between Ms. Mobley and the Foundation, and interviews of witnesses including Ms. Mobley, the Subcommittee finds that Dawn Kelley Mobley's communication with the Foundation improperly influenced the Foundation's submissions and responses to Ms. Olson and the Standards Committee before the 2007 conference.¹⁰²³ The Subcommittee also finds that Ms. Mobley released internal Standards

¹⁰¹³ Karl Rodney October 28, 2009, Tr. at 7–8, Louis Tr. at 22, Faye Rodney Tr. at 45–46.

¹⁰¹⁴ Mobley December 15, 2009, Tr. at 11–12.

¹⁰¹⁵ See Exhibit 33 .

¹⁰¹⁶ See Exhibits 10, 16–17, 20, 31–32.

¹⁰¹⁷ See Exhibit 20.

¹⁰¹⁸ See Exhibits 31–32.

¹⁰¹⁹ Mobley August 11, 2009, Tr. at 9.

¹⁰²⁰ Mobley August 11, 2009, Tr. at 29–30.

¹⁰²¹ Rule 7(d), Rules of the Committee on Standards of Official Conduct, Amended June 9, 2009, 111th Congress.

¹⁰²² Mobley December 15, 2009 Tr. at 40–41.

¹⁰²³ Ms. Mobley was not involved in the review or approval of the 2008 conference.

Committee communications and staff work product without proper authorization in violation of Standards Committee Rule 7(d).

I. THE CARIB NEWS FOUNDATION

Officers and agents of the Carib News Foundation provided false and misleading information to the Standards Committee regarding the true sponsors of the 2007 and 2008 conferences when they submitted the sponsor forms for approval before the conferences, responded to queries from Standards Committee staff, and testified before the Subcommittee regarding the two conferences. Patricia Louis acknowledged that she forwarded the forms and conducted almost all of the communications between the Foundation and the Standards Committee staff for both conferences.¹⁰²⁴ However, Ms. Louis testified that she only provided the information that Mr. Rodney formulated or drafted and instructed her to provide.¹⁰²⁵ Mr. Rodney confirmed that he reviewed all of the communications between Ms. Louis and the Standards Committee and formulated the responses.¹⁰²⁶ Mr. Rodney additionally withheld records and other documentation from the Investigative Subcommittee that he was properly subpoenaed to provide. Mr. Rodney provided some materials after the Subcommittee disclosed that it had already received copies of the subpoenaed documents from other sources. Mr. Rodney also acknowledged to the Subcommittee that he had not provided other records and promised to provide them, which he subsequently failed to do.¹⁰²⁷ Mr. Rodney's withholding of documents and delay in providing other documents obstructed the Subcommittee's investigation of this matter.

The Carib News Foundation is a 501(c)(3) non-profit private foundation as defined by the I.R.C. and as such was prohibited from paying for or reimbursing the travel costs of Members of Congress to attend the 2007 and 2008 Multi-National Business Conferences under the I.R.C.'s self-dealing provisions.¹⁰²⁸ However, the Subcommittee does not find any evidence to support the proposition that the Foundation paid for any of the travel for the Members to attend the 2007 or 2008 conferences.

Mr. Rodney claimed that the Carib News paid for the entire travel costs for the Members to attend both the 2007 and 2008 conferences. If true, the payments would not be prohibited under the I.R.C. Copies of the checks used to pay the lodging, meals and conference costs for each conference were written on Carib News, and not the Foundation's, accounts.¹⁰²⁹ However, only the Foundation was identified as the sponsor of the travel forms submitted by Mr. Rodney to the Standards Committee for both the 2007 and 2008 conferences, implicating the I.R.C. self-dealing provisions.¹⁰³⁰ Based on the evidence, the Subcommittee does not find Mr. Rodney to be credible concerning payments for the Members' travel to attend the 2007 conference. In addition to the checks used to pay Unique Vacations and Sonesta Maho Resorts for the conferences and lodging, American Airlines provided the airline tickets that

¹⁰²⁴ Subcommittee interview of Patricia Louis on November 18, 2009.

¹⁰²⁵ *Id.* at 38.

¹⁰²⁶ Subcommittee Interview of Karl Rodney on December 1, 2009.

¹⁰²⁷ Karl Rodney December 1, 2009, Tr. at 143-146.

¹⁰²⁸ Internal Revenue Code 4941(a).

¹⁰²⁹ See Exhibit 130.

¹⁰³⁰ See Exhibits 67 and 90.

were used by Members to travel to the 2007 conference. Other records indicate the Government of Antigua paid for the lodging and meals used by Members at the 2007 conference. Additional evidence indicates that the Government of St. Maarten paid for the lodging and meals used by Members during the 2008 conference, although the Subcommittee cannot confirm this fact. Mr. Rodney has failed to provide any evidence that contradicts this evidence. While the Foundation solicited the corporate contributions for the conferences, the contributions were deposited into the Carib News bank accounts and the contributions were made specifically for the conferences and not to the general fund of the Foundation.

The Subcommittee finds that the contributed airline tickets, which were provided specifically for the conferences, were “earmarks” under the travel rules. Earmarked funds are those contributed with a specific intent or purpose. Because these tickets were not given to the Foundation to be used for any other purpose of the Foundation, but specifically for the 2007 conference, the Subcommittee finds the tickets were “earmarked.” Therefore, American Airlines should have been identified as a sponsor for the 2007 conference. However, even if American Airlines was identified as a sponsor, approval for Members to attend the conference trip would have been denied because American Airlines took no part in the planning or organization of the trip. House travel regulations require that a sponsor must have a significant role in planning or organizing the trip or an interest in the trip location.¹⁰³¹

The Subcommittee also found evidence that the Foundation had an agreement with the Government of Antigua, the 2007 conference host country, to pay for the lodging and meals of the Members of Congress who attended the conference.¹⁰³² During his initial interview before the Subcommittee, Mr. Rodney claimed that he had paid for Members’ lodging and meals. However, when confronted with a memorandum that he had written to the Government of Antigua Minister of Finance in October 2007, which informed the Minister of the amount the Government of Antigua was to pay to Unique Vacations for Members and VIPs, Mr. Rodney appeared shocked and claimed he did not know if the Government of Antigua made the payment.¹⁰³³ The memorandum was provided to the Subcommittee by Unique Vacations and was not included in any of the materials received from the Foundation or Carib News, Inc. pursuant to the Standards Committee subpoena served on Mr. Rodney. This document was responsive to the subpoena, which asked for any and all records relating to the travel of any member, delegate, officer or employee of the House including invoices and the indicia of payments and other documents relating to travel. The original agreement between the Foundation and the Government of Antigua required the Government of Antigua to pay for a fixed number of rooms for VIPs and Members.¹⁰³⁴

After his initial interview with the Subcommittee, Mr. Rodney, through counsel, produced additional documents regarding the 2007 and 2008 conferences that, although not previously provided

¹⁰³¹ Comm. on Standards of Official Conduct, *Travel Guidelines and Regulations*, at 3 (Feb. 20, 2007).

¹⁰³² See Exhibit 3.

¹⁰³³ *Id.*

¹⁰³⁴ *Id.*

pursuant to the subpoena authorized by the Subcommittee, were responsive to the Subpoena and within the Foundation's possession and control. Among these documents was a copy of the memorandum to the Minister of Finance of the Government of Antigua.¹⁰³⁵

Mr. Rodney asserted, during his second interview before the Subcommittee, that he recalled the agreement with the Government of Antigua and that he notified the Antiguan government they would not be responsible for the lodging of the Members after he learned from the "committee" that the Government of Antigua could not be sponsors.¹⁰³⁶ Mr. Rodney could not specifically identify anyone from the Standards Committee whom he purportedly had this conversation with.¹⁰³⁷ Mr. Rodney also could not provide any memorandum or email communication with the government that supported his claim.¹⁰³⁸ In fact, when he was asked about this issue during his first interview before the Subcommittee, he did not mention that he informed the Government of Antigua they could not pay for the Members' lodging.¹⁰³⁹ Additionally, the Government of Antigua still paid the agreed upon \$31,500, which was not reduced to reflect the alleged non-payment of the Members' lodging.¹⁰⁴⁰ Mr. Rodney attempted to explain the unreduced payment by the Government of Antigua. Mr. Rodney stated that he paid for the Members' lodging and the Government of Antigua's payment covered the lodging for additional VIPs.¹⁰⁴¹ However, there is no evidence that Mr. Rodney amended the agreement in this manner. The Subcommittee does not find Mr. Rodney to be credible on this issue.

The Subcommittee believes that Mr. Rodney intentionally withheld subpoenaed documents until he realized that the Subcommittee had obtained them from another source. The memorandum to Dr. Cort was not provided by Mr. Rodney until after he had been shown the same memorandum that the Subcommittee received from Unique Vacations. During the brief period between interviews, while Mr. Rodney was allegedly extremely busy with the 2009 conference, he was able to "find" the memorandum along with additional records that he had not previously provided, but that had already been provided to the Standards Committee by other sources. Because no evidence indicated that Mr. Rodney modified the agreement with the Government of Antigua, and the evidence showed that the Government of Antigua did in fact pay the agreed upon amount which included the Members' lodging, the Subcommittee finds that the Government of Antigua paid for the lodging and meals of the Members who attended the 2007 conference.

The Subcommittee found no evidence that the Members were aware of the agreement between the Foundation and the Government of Antigua. Because the Members believed their lodging and meals were paid for by the Foundation, based on the assertions and certifications of Karl Rodney, it was only logical to identify the Carib News Foundation as the source for the payment of their trav-

¹⁰³⁵ See Exhibit 3.

¹⁰³⁶ Karl Rodney December 1, 2009, Tr. at 8.

¹⁰³⁷ Karl Rodney December 1, 2009, Tr. at 14.

¹⁰³⁸ Karl Rodney December 1, 2009, Tr. at 38–40.

¹⁰³⁹ Karl Rodney October 28, 2009, Tr. at 101–103.

¹⁰⁴⁰ See Exhibit 66.

¹⁰⁴¹ Karl Rodney December 1, 2009, Tr. at 40–42.

el expenses. Had the Members known of the payment by the Government of Antigua, they would have been required to report it to the Standards Committee under the House travel rules related to the FGDA. Once the Standards Committee learned of the payment by the Government of Antigua, it would have notified the Members that the payment was improper, similar to the notification about the trip to Montserrat, and required the Members to reimburse the Government of Montserrat for their lodging out of other funds.

The same agreement was in place with the Government of St. Maarten for the 2008 conference to pay for the Members' lodging.¹⁰⁴² The agreement document provided by Mr. Rodney for the 2008 conference is the same as the previous agreement with the Government of Antigua.¹⁰⁴³ A memorandum from Mr. Rodney to the Government of St. Maarten omits the word "Members."¹⁰⁴⁴ The fact that the word "Members" was no longer in the memorandum, even though the rest of the wording was the same as the 2007 memorandum, and was an issue raised by Mr. Rodney without prompting during his testimony¹⁰⁴⁵ before the Subcommittee, causes the Subcommittee to believe that Mr. Rodney created the document in preparation for his testimony.

The Subcommittee does not find Mr. Rodney to be credible regarding the payments made by the governments of Antigua or St. Maarten for the lodging of Members who attended the 2007 or 2008 conferences.

The Subcommittee does not find Mr. Rodney to be credible regarding his communications with the Standards Committee staff during the pre-travel review of the 2007 and 2008 conferences. Mr. Rodney testified over and over again that he identified the Foundation as the sole sponsor of the 2007 and 2008 conferences only because the Standards Committee's staff instructed him to do so.¹⁰⁴⁶ The facts show otherwise. Before he communicated with Dawn Mobley or Susan Olson in 2007, he listed only the Carib News Foundation as the sponsor.¹⁰⁴⁷ Mr. Rodney listed the other corporations initially, but only in response to a question eliciting information about the relationship of sponsors to the 2007 conference.¹⁰⁴⁸ While he stated he was directed to list them as participants and not sponsors, he also stated many times during his testimony that the corporations could not be sponsors.¹⁰⁴⁹ The emails from Susan Olson to Patricia Louis clearly indicated that she continued to inquire about the nature of the corporations and whether the corporations and foreign government were paying for any part of the travel or conference.¹⁰⁵⁰ Patricia Louis' responses, which Mr. Rodney formulated, continued to state that the Foundation was the only sponsor and that the corporations merely contributed to the general fund of the Foundation.¹⁰⁵¹ At best, these statements were misleading. Mr. Rodney specifically solicited the corporations to provide funding for the conferences, not the Foundation gen-

¹⁰⁴² See Exhibits 86–87.

¹⁰⁴³ See Exhibit 87.

¹⁰⁴⁴ See Exhibit 86.

¹⁰⁴⁵ Karl Rodney December 1, 2009, Tr. at 16.

¹⁰⁴⁶ Investigative Subcommittee interview of Karl Rodney on December 1, 2009.

¹⁰⁴⁷ See Exhibit 13.

¹⁰⁴⁸ See Exhibit 13.

¹⁰⁴⁹ Investigative Subcommittee interview of Karl Rodney on December 1, 2009.

¹⁰⁵⁰ See Exhibits 19, 23.

¹⁰⁵¹ See Exhibits 21, 24, 28.

erally.¹⁰⁵² Ms. Louis also verified that the corporations were solicited only to support the conferences and not any other event the Foundation held.¹⁰⁵³

The Subcommittee finds that the evidence is overwhelming that corporations provided donations specifically to support the 2007 and 2008 conferences and those corporate funds were co-mingled with other funds in the Carib News corporate bank accounts. These funds were used to pay the costs of the conferences. Mr. Rodney claimed that the conferences cost over \$400,000 each year. He further claimed that contributions amounted to approximately \$200,000, and that Carib News paid the balance for the conferences. However, the records provided by the two resorts and the Foundation indicate that lodging, meals and costs for conference facilities were between \$90,000 and \$112,000.¹⁰⁵⁴ While Mr. Rodney assured the Subcommittee he had and would provide a breakout of costs for each conference, he did not do so.¹⁰⁵⁵

In addition to the corporate donations, the Foundation also received fees for lodging, meals, and conference costs from most attendees. Based on the total costs of the conferences indicated by the invoice from the two resorts, the fees the Foundation received would have paid for a significant portion of the lodging and meal costs for the conferences.

Mr. Rodney testified that he believed that the corporations he solicited could not be sponsors of the annual conferences under the new rules and that only the Foundation could sponsor the conference starting in 2007.¹⁰⁵⁶ He also believed the Foundation was required to pay for the Members' expenses.¹⁰⁵⁷ However, in preparation for the 2008 conference, Mr. Rodney continued to solicit corporations to become "sponsors" for the upcoming conference.¹⁰⁵⁸ He also indicated Members of Congress would be present at the 2008 conference, and solicited American Airlines to again provide airline tickets for the Members to attend the 2008 conference.¹⁰⁵⁹

The Subcommittee finds that Mr. Rodney submitted false information to the Standards Committee and to the Members invited to attend the 2007 and 2008 conferences on multiple occasions. Karl Rodney knowingly and willfully instructed Patricia Louis to enter information known to him to be false or misleading. Karl Rodney subsequently certified the truth of the false or misleading information on forms that were submitted to the Standards Committee.¹⁰⁶⁰ Mr. Rodney, through Patricia Louis, knowingly and willfully provided false information to Standards Committee staff during their inquiries into the nature of the corporations and requests regarding any outside sponsors of the corporations. Mr. Rodney, through Patricia Louis, knowingly and willfully provided false information to Members of Congress when they submitted the post-travel cost information relied upon by Members to file their Post-Travel Dislo-

¹⁰⁵² See Exhibits 36–37, 39–47, 79–80.

¹⁰⁵³ Subcommittee interview of Patricia Louis on November 18, 2009.

¹⁰⁵⁴ See Exhibits 89 and 129.

¹⁰⁵⁵ Karl Rodney December 1, 2009, Tr. at 141–145. See also Karl Rodney October 28, 2009, Tr. at 22.

¹⁰⁵⁶ Subcommittee interviews of Karl Rodney on October 28 and December 1, 2009. See Exhibits 79–80.

¹⁰⁵⁷ Id.

¹⁰⁵⁸ See Exhibits 79–80.

¹⁰⁵⁹ See Exhibits 79–80.

¹⁰⁶⁰ See Exhibits 67, 90.

sure Forms.¹⁰⁶¹ Additionally, Mr. Rodney knowingly and willfully provided false testimony, under oath, to the Subcommittee and withheld subpoenaed documents and other materials.

The Subcommittee finds that officers and agents of the Foundation, Karl Rodney, and Patricia Louis at Karl Rodney's direction, submitted false statements to the Standards Committee when they completed and forwarded the Private Sponsor Travel Certification Form to the Standards Committee without identifying the Government of Antigua as a sponsor to the 2007 conference, in violation of 18 U.S.C. § 1001. Karl Rodney, and Patricia Louis at Karl Rodney's direction, provided additional false statements to the Standards Committee when they were specifically asked about payments for lodging and did not disclose the agreement with the Government of Antigua at that time in violation of 18 U.S.C. § 1001. The Subcommittee further finds that Karl Rodney falsely testified before the Subcommittee, under oath, when he stated that he informed the Government of Antigua they would not be paying for the lodging used by the Members' and that Carib News paid for the Members lodging in violation of 18 U.S.C. § 1512(c).

The Subcommittee also finds that Karl Rodney, through Patricia Louis, submitted a false statement to the Standards Committee by certifying that the Foundation was the sole sponsor of the conference when they submitted the Private Sponsor Travel Certification Form for the 2007 Multi-National Business Conference. Ms. Olson inquired of Ms. Louis, who testified she passed along the email to Mr. Rodney, as to the role of the various corporations and the Government of Antigua. Mr. Rodney testified that he formulated all of the responses to Ms. Olson.¹⁰⁶² There is no evidence that Ms. Olson directed Mr. Rodney or Patricia Louis to identify the corporations as participants and not sponsors as claimed. The email communications show Ms. Olson asked the Foundation to provide direct answers regarding any payments by the corporations listed in the emails to support the 2007 conference. The responses formulated by Mr. Rodney and sent by Ms. Louis falsely denied the role of the contributors to the 2007 conference.

The Subcommittee further finds that Karl Rodney, and Patricia Louis at Karl Rodney's direction, submitted false statements to the Members of Congress who attended the 2007 conference in the submission of the post-conference memorandum indicating the total amounts paid for each Member. This information provided, which was relied on by the Members when they filed their Post-Travel Disclosure Forms, was known by both Patricia Louis and Karl Rodney to be inaccurate. Mr. Rodney and Ms. Louis were both aware that American Airlines provided the airline tickets used by the Members and therefore Carib News Foundation paid only \$22.00 each for taxes. Mr. Rodney and Ms. Louis also knew that the Government of Antigua paid \$31,500 for the rooms used by Members and VIPs, as agreed. Additionally, Mr. Rodney and Ms. Louis were both aware that the room rates agreed to under the contract between the Foundation and Unique Vacations provided different rates than those claimed in the post-travel memorandum submitted to the Members.

¹⁰⁶¹ See Exhibits 68, 92.

¹⁰⁶² Karl Rodney December 1, 2009, Tr. at 67.

The Subcommittee finds that Karl Rodney, and Patricia Louis at Karl Rodney's direction, submitted false statements to Congress when they submitted the Private Sponsor Travel Certification Form to invited Members and employees of Congress in relation to the 2008 Multi-National Business Conference, identifying only the Carib News Foundation as the sole sponsor.¹⁰⁶³

The Subcommittee also finds that Karl Rodney and Faye Rodney provided false statements to Margaret Perl, Standards Committee counsel, when they denied, during her interview of them regarding the 2008 conference, that any entity other than the Foundation paid for any part of the 2008 conference.¹⁰⁶⁴ Karl Rodney claimed during the interview with Ms. Perl that the corporations provided financial support to the general fund of the Foundation and not to the conference specifically.¹⁰⁶⁵ However, the letters, invoices, and other communication he had with the corporations clearly indicate the corporations provided financial support specifically to the 2008 conference.

The Subcommittee further finds that Karl Rodney, and Patricia Louis at Karl Rodney's direction, submitted false statements to Congress when they prepared and forwarded a memorandum to Members after the 2008 conference detailing the expenses paid on behalf of the Members.¹⁰⁶⁶ The amounts claimed as paid by the Foundation were contradicted by the actual payments made on Mr. Rodney's credit card for airline transportation as well as the agreed upon room rate with the Sonesta Maho Resort in St. Maarten.

V. RECOMMENDATIONS

Pursuant to Committee Rule 19(g), the Investigative Subcommittee makes the following recommendations:

1. The Investigative Subcommittee recommends that the Standards Committee refer the matters involving Karl Rodney, Faye Rodney and Patricia Louis, regarding their providing or conspiring to provide, false information to Congress, on multiple occasions, in violation of 18 U.S.C. § 1001 and 18 U.S.C. § 1505, to the U.S. Department of Justice for such action as the Department deems necessary.

2. The Investigative Subcommittee recommends that the Standards Committee authorize the release of materials in possession of the Committee and not available through any other source, to the U.S. Department of Justice, as necessary for any further action the Department of Justice pursues as a result of the referral of this matter.

3. As explained in this Report, the Investigative Subcommittee is concerned that violations of House rules and other standards of conduct may have occurred. The Investigative Subcommittee could pursue these matters only if its jurisdiction were expanded pursuant to Standards Committee rules and the resolution adopted by the Standards Committee on June 24, 2009. The Investigative Subcommittee does not find sufficient evidence to conclude, nor does it believe that it would discover additional evidence to alter its conclusion, that Representative Rangel had actual knowledge of the

¹⁰⁶³ See Exhibit 90.

¹⁰⁶⁴ Perl Tr. at 36.

¹⁰⁶⁵ *Id.*

¹⁰⁶⁶ See Exhibit 92.

memoranda written by his staff. However, the Investigative Subcommittee finds Representative Rangel is responsible for the knowledge maintained by his staff. For this reason, the Investigative Subcommittee does not recommend that its jurisdiction be expanded. Rather, the Investigative Subcommittee recommends the Standards Committee adopt this Report as the Report of the full Committee and approve its dissemination to the House and the public. It is the intention of this Investigative Subcommittee that the publication of this Report will serve as a public admonishment by the Standards Committee to Representative Rangel. The Investigative Subcommittee also intends the publication of this report will serve as an advisory for all Members, employees, and officials of the House that Members may be held responsible for the knowledge and official conduct of their staff. Furthermore, the Investigative Subcommittee recommends that the Standards Committee request Representative Rangel to repay the total cost of his trips to attend the 2007 and 2008 conferences.

4. As explained in this Report, the conduct of Dawn Kelly Mobley in this matter raises concerns that violations of House Rules and other standards of conduct may have occurred. The Investigative Subcommittee could pursue these matters only if its jurisdiction were expanded pursuant to Standards Committee rules and the resolution adopted by the full Standards Committee on June 24, 2009. However, the Investigative Subcommittee does not recommend that its jurisdiction be expanded. Rather, the Investigative Subcommittee recommends the Standards Committee adopt this Report as the Report of the full Committee and approve its dissemination to the House and the public. It is the intention of this Investigative Subcommittee that the publication of this Report will serve as a public admonishment by the Committee to Ms. Mobley.

5. Based on its investigation, the Investigative Subcommittee recommends that the Standards Committee establish written policies and procedures as to the duties and responsibilities of the designated counsels to the Chair and Ranking Member to ensure that such counsels are performing their duties to the Committee consistent with the provisions of Committee Rule 6. The interaction of the designated counsels in the travel review process or other Standards Committee functions performed by the professional staff can result, as the Subcommittee believes happened in this case, in improperly influencing the actions and recommendations of the staff.

6. During the course of its review, the Investigative Subcommittee encountered areas that could benefit from improvement in the current House rules and Standards Committee rules regarding travel. The Investigative Subcommittee recommends that the Standards Committee conduct a review of the current House travel rules and Standards Committee rules as necessary to ensure that information submitted by a sponsor accurately reflects the source of funding for Congressional travel and any other amendments that may be necessary to ensure an effective and efficient travel review process. For example, sponsors should be required to certify to the accuracy of all information provided to invitees, including the post-travel cost information. Failure to provide certified post-travel information may result in that sponsor being ineligible to sponsor future trips. The travel regulations should also be amended to clarify

the definition of a permissible source and to foster the identification and disclosure of such sources in connection with congressional travel.

7. During the course of the investigation, counsel for Karl Rodney was also engaged to represent Faye Rodney and Patricia Louis. The record indicates that information and questions asked during the Subcommittee interviews of one witness were disclosed to the other witnesses prior to their testimony or that counsel used the testimony of one witness to prepare the other witnesses for their testimony. Each witness was given a sequestration warning at the conclusion of his or her testimony. As addressed by the investigative subcommittee in *In the Matter of Representative Earl F. Hilliard*, multiple representation by one counsel is “inimical to the fact finding process.”¹⁰⁶⁷ Thus, the Investigative Subcommittee recommends that the Standards Committee adopt a rule prohibiting or limiting representation of multiple witnesses by counsel or counsels within the same firm.

8. The Investigative Subcommittee finds that Representative Bennie Thompson did not knowingly violate any provision of the House gift rule or other applicable rules of conduct when he accepted payment or reimbursement of travel to the 2007 and 2008 conferences. Additionally, the Investigative Subcommittee finds that Representative Bennie Thompson is entitled to rely upon the opinion letter issued by the Standards Committee approving his travel to the 2007 and the 2008 conferences. Therefore, Representative Thompson may not be sanctioned for unknowingly violating provisions of the House gift rule and other applicable rules or statutes. Nevertheless, the Investigative Subcommittee recommends that the Standards Committee request Representative Thompson to repay the costs of his trips to attend the 2007 and 2008 conferences as determined by the Standards Committee using its standard practices relating to the reimbursement of trips determined to be invalid. The Investigative Subcommittee further recommends that the Standards Committee dismiss the review of officially connected travel by Representative Thompson to the 2007 and 2008 conferences.

9. The Investigative Subcommittee finds that Delegate Donna Christensen did not knowingly violate any provision of the House gift rule or other applicable rules of conduct when she accepted payment or reimbursement of travel to the 2007 and 2008 conferences. Additionally, the Investigative Subcommittee finds that Delegate Christensen is entitled to rely upon the opinion letter issued by the Standards Committee approving her travel to the 2007 and the 2008 conferences. Therefore, Delegate Christensen may not be sanctioned for unknowingly violating provisions of the House gift rule. Nevertheless, the Investigative Subcommittee recommends that the Standards Committee request Representative Christensen to repay the costs of her trips to attend the 2007 and

¹⁰⁶⁷ See House Comm. on Standards of Official Conduct, *In the Matter of Representative Earl F. Hilliard*, H. Rep. 107–130, 107th Cong., 1st Sess. 98 (July 10, 2001) (describing multirepresentation of witnesses as “inimical to the fact-finding process”); see also House Comm. on Standards of Official Conduct, *Investigation of Certain Allegations Related to Voting on the Medicare Prescription Drug, Improvement, and Modernization Act of 2003*, H. Rep. 108–722, 108th Cong., 2d Sess. 13–14 & n.16 (recommending a “sequestration of witnesses” requirement be implemented in future inquires by Committee rule, policy, or resolution and noting that multirepresentation of witnesses by the same attorney “poses a substantial risk to the integrity of an investigation”).

2008 conferences as determined by the Standards Committee using its standard practices relating to the reimbursement of trips determined to be invalid. The Investigative Subcommittee further recommends that the Standards Committee dismiss the review of officially connected travel by Delegate Christensen to the 2007 and 2008 conferences.

10. The Investigative Subcommittee finds that Representative Yvette Clarke did not knowingly violate any provision of the House gift rule or other applicable rules of conduct when she accepted payment or reimbursement of travel to the 2007 conference. Additionally, the Investigative Subcommittee finds that Representative Yvette Clarke is entitled to rely upon the opinion letter issued by the Standards Committee approving her travel to the 2007 conference. Therefore, Representative Clarke may not be sanctioned for unknowingly violating provisions of the House gift rule. Nevertheless, the Investigative Subcommittee recommends that the Standards Committee request Representative Clarke to repay the costs of her trip to attend the 2007 conference as determined by the Standards Committee using its standard practices relating to the reimbursement of trips determined to be invalid. The Investigative Subcommittee further recommends that the Standards Committee dismiss the review of officially connected travel by Representative Clarke to the 2007 conference.

11. The Investigative Subcommittee finds that Representative Donald Payne did not knowingly violate any provision of the House gift rule or other applicable rules of conduct when he accepted payment or reimbursement of travel to the 2008 conference. Additionally, the Investigative Subcommittee finds that Representative Donald Payne is entitled to rely upon the opinion letter issued by the Standards Committee approving his travel to the 2008 conference. Therefore, Representative Payne may not be sanctioned for unknowingly violating provisions of the House gift rule. Nevertheless, the Investigative Subcommittee recommends that the Standards Committee request Representative Payne to repay the costs of his trip to attend the 2008 conference as determined by the Standards Committee using its standard practices relating to the reimbursement of trips determined to be invalid. The Investigative Subcommittee further recommends that the Standards Committee dismiss the review of officially connected travel by Representative Payne to the 2008 conference.

12. The Investigative Subcommittee finds that Representative Carolyn Cheeks Kilpatrick did not knowingly violate any provision of the House gift rule or other applicable rules of conduct when she accepted payment or reimbursement of travel to the 2008 conference. Additionally, the Investigative Subcommittee finds that Representative Carolyn Cheeks Kilpatrick is entitled to rely upon the opinion letter issued by the Standards Committee approving her travel to the 2008 conference. Therefore, Representative Kilpatrick may not be sanctioned for unknowingly violating provisions of the House gift rule. Nevertheless, the Investigative Subcommittee recommends that the Standards Committee request Representative Kilpatrick to repay the costs of her trip to attend the 2008 conference as determined by the Standards Committee using its standard practices relating to the reimbursement of trips determined to be invalid. The Investigative Subcommittee further

recommends that the Standards Committee dismiss the review of officially connected travel by Representative Kilpatrick to the 2008 conference.

13. The Investigative Subcommittee recommends that the Standards Committee transmit this Report to the House and approve its dissemination to the public.

111th CONGRESS, 1st SESSION
U.S. HOUSE OF REPRESENTATIVES
COMMITTEE ON STANDARDS OF OFFICIAL CONDUCT

**Investigation into Officially Connected Travel of House Members to Attend the Carib
News Foundation Multinational Business Conferences in 2007 and 2008.**

Appendix A

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended.

OFFICE OF CONGRESSIONAL ETHICS

U.S. HOUSE OF REPRESENTATIVES

REPORT

Review No. 09-3698

The Board of the Office of Congressional Ethics, by a vote of no less than four members, on May 29, 2009 adopted the following report and ordered it to be transmitted to the Committee on Standards of Official Conduct of the U.S. House of Representatives.

SUBJECT: Delegate Donna Christensen

NATURE OF THE ALLEGED VIOLATION: There is substantial reason to believe that Delegate Donna Christensen's participation in the 13th Annual Caribbean Multi-National Business Conference in St. Maarten, N.A. from November 6-9, 2008, her acceptance of reimbursement of expenses to attend that conference and the Member Post Travel Disclosure Form she filed violated various provisions of House Rule XXV Section 5(b).

RECOMMENDATION: The Board of the Office of Congressional Ethics recommends that the Committee on Standards of Official Conduct further review the above described allegations concerning Delegate Christensen.

VOTES IN THE AFFIRMATIVE: 6

VOTES IN THE NEGATIVE: 0

MEMBER OF THE BOARD OR STAFF DESIGNATED TO PRESENT THIS REPORT TO THE STANDARDS COMMITTEE: Leo Wise, Staff Director & Chief Counsel.

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FINDINGS OF FACT AND CITATIONS TO LAW

Review No. 09-3698

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OFFICE OF CONGRESSIONAL ETHICS
U.S. HOUSE OF REPRESENTATIVES

FINDINGS OF FACT AND CITATIONS TO LAW

Review No. 09-3698

On May 29, 2009 the Board adopted the following findings of fact and accompanying citations to law, regulations, rules and standards of conduct (*in italics*). The Board notes that these findings do not constitute a determination that a violation actually occurred.

I. INTRODUCTON

1. Delegate Donna Christensen attended the 13th Annual Caribbean Multi-National Business Conference in St. Maarten, N.A., from November 6-9, 2008. Delegate Christensen received funds from a private source to participate in the conference.

A. Summary of Allegations

2. There is substantial reason to believe that Delegate Christensen violated the requirement that she identify the “true, correct and accurate” sponsor of her travel “to the best of her knowledge” on her Member Post Travel Disclosure Form. While forms submitted to her office and the Standards Committee before the conference identified one entity as the sponsor—the Carib News Foundation—once at the conference, Delegate Christensen was presented with indications that other corporations—including Citigroup, IBM, AT&T, Pfizer, Macy’s and Verizon Foundation—were also sponsors. For instance, Delegate Christensen attended a session where her colleagues, in remarks, thanked “the sponsors” after the corporations were identified as such. She also participated in a ribbon cutting ceremony with representatives of the corporate entities. Those indications proved to be true—these corporations were in fact sponsors of Delegate Christensen’s travel according to House travel rules because the corporations had donated funds specifically for the conference (i.e. earmarked funds). Further, events that occurred in 2007 affected the Standards Committee’s ability to determine whether these corporations were sponsors in 2008:
 - a. In 2007, the House of Representatives changed the rules governing travel. Those changes placed limitations on the number of days Members of Congress could participate in events (such as conferences) when their travel was sponsored by an

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entity that employs or retains a lobbyist. The changes affected the annual Caribbean Multi-National Business Conference. In 2007, the Carib News Foundation continued to identify various corporations as sponsors on the conference agenda and on a draft version of the Private Sponsor Travel Certification Form prepared for submission to the Standards Committee for approval. However, after interacting with the counsel to the then-Chair of the Standards Committee, and apparently without the knowledge of the staff attorney reviewing the trip, the documents identifying the corporations as "sponsors" were changed and their sponsorship was not disclosed.

- b. The 2007 conduct and attendant misrepresentations appear to have directly influenced what occurred in 2008. When the Carib News Foundation submitted materials to the Standards Committee for their approval of the 2008 conference, the Carib News Foundation took the same approach as they were instructed to take in 2007 and did not disclose the role of the corporate sponsors on the forms they submitted to the Standards Committee.
3. There is substantial reason to believe that Delegate Christensen violated House Rule 25, clause 5(b)(1)(C) by accepting trip-related reimbursements from entities that employ or retain lobbyists for participating in an event for more than one day.
4. There is substantial reason to believe that Delegate Christensen violated House Rule 25 clause 5(h)(i)(1)(B) by underreporting the value of the travel reimbursements she received to attend the 13th Annual Caribbean Multi-National Business Conference.
5. There is substantial reason to believe that the Carib News Foundation's payment of travel expenses for Delegate Christensen and her acceptance of payment violated the Internal Revenue Code. As stated above, Carib News Charities, the name previously held by the 501(c) organization now known as the Carib News Foundation, is listed as a private foundation in the Internal Revenue's cumulative list of charitable organizations, Publication 78. Therefore, the Standards Committee should not have approved the trip because the funds came from a prohibited source.

B. A Note on Culpability

6. These findings fall into four categories: (1) the sponsor or sponsors, as the case appears to be, of the conference; (2) the intervention of the counsel to the former Chair of the Standards Committee in the Standards Committee's review process of the conference in 2007 and how it affected the information before the Standards Committee in 2008; (3) the accuracy of the value of the reimbursement submitted by Delegate Christensen and (4)

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whether, because of its tax status, the Carib News Foundation could lawfully pay for Delegate Christensen's conference-related expenses.

7. While all these topics are relevant, the Board notes that they do not all involve conduct by Delegate Christensen to the same degree.
 - a. As to topic 1, determining the identity of the true sponsor or sponsors implicates the conduct of both Delegate Christensen and the Standards Committee. Delegate Christensen told the OCE she relied on the Standards Committee to make that determination. It is the Board's view that the Member's approach is reasonable to a point. Once Delegate Christensen arrived at the conference, however, she was confronted with information that other corporations were co-sponsors. That information, at least in 2008, does not appear to have been before the Standards Committee when they initially approved the 2008 travel.
 - b. As to topic 2, the intervention of the counsel to the former Chair of the Standards Committee in the Standards Committee's review of the 2007 conference did not involve Delegate Christensen. Nonetheless, it directly bears on whether and to what extent the Standards Committee could determine the true sponsor of the conference in 2008.
 - c. As to topic 3, the accuracy of the information Delegate Christensen provided as to the value of the reimbursement of her conference-related expenses most directly implicates her conduct. The post-travel disclosure form that all Members must file when they accept privately sponsored travel is signed and certified by Members. The form puts the obligation on Members, not staff, not the Standards Committee and not sponsors, to certify that the information on the form is "true, accurate and complete" to the "best of the Member's knowledge." Delegate Christensen saw the documents that showed the true value of her travel. Nonetheless, she certified inaccurate information on the post-travel disclosure form.
 - d. Topic 4, limitations on Carib News Foundation's ability to pay for overseas travel of government officials, does not implicate Delegate Christensen. Nonetheless, the law prohibits such payments. Therefore, the Board feels compelled to include a discussion of this issue in this referral.

C. Jurisdictional Statement

8. The allegations that are the subject of this review concern Delegate Donna Christensen, a Member of the United States House of Representatives from the Virgin Islands. The

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Resolution the United States House of Representatives adopted creating the Office of Congressional Ethics directs that, "[n]o review shall be undertaken...by the board of any alleged violation that occurred before the date of adoption of this resolution."¹ The House adopted this Resolution on March 11, 2008. Because the conduct under review occurred or relates to actions taken after March 11, 2008, review by the Office of Congressional Ethics is in accordance with the Resolution.

D. Procedural History

9. A preliminary review in this matter commenced on March 6, 2009 following a written request by at least two members of the OCE Board which was made on February 23, 2009.
10. At least three members of the Board voted to initiate a second-phase review in this matter on March 27, 2009. The Board voted to extend the second-phase review by 14 days, as provided for under the Resolution, on April 24, 2009.
11. The second-phase review ended on May 26, 2009.
12. The Board voted to refer the matter to the Standards Committee for further review on May 29, 2009.
13. The OCE requested documents from and interviews with representatives of:
 - (1) Representative Sheila Jackson-Lee's Congressional office;
 - (2) the Verizon Foundation;
 - (3) Citibank;
 - (4) American Airlines;
 - (5) IBM;
 - (6) Macy's, Inc;
 - (7) Pfizer;
 - (8) AT&T;

¹ House Resolution 895 of the 110th Congress, Section 1(e).

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- (9) Representative Kilpatrick's Congressional office;
- (10) Representative Payne's Congressional office;
- (11) Representative Rangel's Congressional office;
- (12) Representative Thompson's Congressional office;
- (13) Delegate Christensen's Congressional office;
- (14) The Carib News; and
- (15) The Carib News Foundation

II. Multiple Entities, Including CARIB NEWS (the Newspaper), the Government of St. Maarten and Several Corporations, Sponsored Delegate Christensen's Trip

14. *Under House Rule 25 clause 5(d), Members are required to obtain prior approval of the Standards Committee for trips where the Member's travel expenses will be reimbursed by a private source. The Standards Committee has adopted regulations, pursuant to House Rule 25 clause 5(h)(1)(B)² that requires Members to identify the "sponsor(s)," i.e. the party reimbursing travel expenses, for any trip where the payor is a private entity.*
15. There is substantial reason to believe that Delegate Christensen violated the requirement that she identify the "true, correct and accurate" sponsor of her travel "to the best of her knowledge" on her Member Post Travel Disclosure Form. While forms submitted to her and the Standards Committee before the conference identified one sponsor—the Carib News Foundation—once at the conference, Delegate Christensen was presented with indications that other corporations were also sponsors. As will be discussed below, those indications proved to be true—these corporations were in fact sponsors of Delegate Christensen's travel according to House travel rules because these corporations had donated funds specifically for the conference (i.e. earmarked funds).

A. Delegate Christensen's Knowledge of The Involvement of These Corporations in the Conference

16. On her Member Post-Travel Disclosure Form, Delegate Christensen listed Carib News Foundation as the only sponsor of the 13th Annual Caribbean Multi-National Business

² House Rule 25(5)(h)(1)(B) directs the Standards Committee to establish, "regulations describing the information it will require individuals subject to this clause to submit to the committee in order to obtain the prior approval of the committee for any travel covered by this clause . . ." On February 20, 2007, the Committee issued guidelines and regulations concerning the travel restrictions and requirements.

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Conference in St. Maarten, N.A. (hereafter "the trip" or "conference"³) in December 2008.⁴

U.S. House of Representatives 110 th Congress	
MEMBER / OFFICER POST-TRAVEL DISCLOSURE FORM	
<p>This form is for disclosing the receipt of travel expenses from a private source for meetings, speaking engagements, fact-finding trips or similar events in connection with official duties. You need not disclose government-funded or political travel on this form, or travel that is unrelated to official duties. This form does not eliminate the need to report all privately-funded travel on the Member or officer's annual Financial Disclosure Statement. In accordance with clause 5 of House Rule 25, complete this form and file it with the Clerk of the House of Representatives, B-106 Cannon House Office Building, within 15 days after travel is completed. The Clerk is to make these forms available to the public as soon as possible after they are received.</p>	
1. Name of Traveler:	<u>Donna M. Christensen</u>
2. a. Name of Accompanying Family Member (if any):	<u>None</u>
b. Relationship to Member/Officer:	<input type="checkbox"/> Spouse <input type="checkbox"/> Child <input type="checkbox"/> Other (specify): _____
3. a. Date of Departure and Date of Return:	<u>11/6</u> to <u>11/8</u>
b. Dates at personal expense (if any):	<u>None</u>
4. Itinerary (dates of departure - destination - return):	<u>St. Croix - St. Maarten - St. Thomas</u>
5. Sponsor(s) (who paid for the trip):	<u>Carib News Foundation</u>

17. Delegate Christensen certified that this information was "true, correct and complete" to the "best of [her] knowledge."⁵

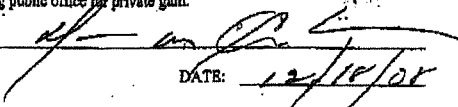
³ The "Member/Officer Post-Travel Disclosure Form" asks the filer at question 5, "Sponsor(s) (who paid for the trip)." This in turn raises the question is a conference a "trip" or is a trip limited to the travel expenses associated with attending the trip, e.g., transportation, lodging and meal expenses? The House Ethics manual and the relevant forms use the terms "travel" and "trip" interchangeably. For example, the relevant form is called a Member/Officer Post-Travel Disclosure Form" (emphasis added). The introductory paragraph on the form provides, "[t]his form is for disclosing the receipt of travel expenses from a private source for meetings, speaking engagements, fact-finding trips or similar events in connection with official duties" (emphasis added). However, question 9 on the form asks the filer to detail, "TRIP EXPENSES" and uses as an example, "registration fees." Registration fees are not "travel" expenses unless one defines travel (or a trip) to include participating in a conference. The Board uses the term "trip" to include the conference. The Board also notes that the Standards Committee treated the conference as the "trip" in its letter of October 21, 2008 pre-approving Delegate Christensen's trip.

⁴ Member/Officer Post-Travel Disclosure Form signed by Delegate Donna M. Christensen (Dec. 22, 2008) (Exhibit 1 at 09-3698 0002).

⁵ *Id.* at 09-3698 0003

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I certify that the information contained in this form is true, complete, and correct to the best of my knowledge. I have determined that all of the expenses listed above were necessary and that the travel was in connection with my duties as a Member or Officer of the U.S. House of Representatives and would not create the appearance that I am using public office for private gain.	
SIGNATURE OF MEMBER:	
	DATE: 12/18/08

18. Prior to the conference, Karl Rodney, the CEO of the Carib News Foundation, submitted a Private Sponsor Travel Certification Form to Congressman Thompson, which he in turn submitted to the Standards Committee that identified the Carib News Foundation as the sponsor of the trip.⁶

U.S. House of Representatives Committee on Standards of Official Conduct	
PRIVATE SPONSOR TRAVEL CERTIFICATION FORM (provide directly to each House invitee)	
This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers or employees under House Rule XXV, clause 5. A completed copy of the form (and any attachments) should be provided to each invited House Member, officer or employee, who will then forward it to the Committee. The trip sponsor should NOT submit the form directly to the Committee.	
<i>Private sponsors are urged to submit this form to each House invitee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the invitee not receiving approval for the trip. The submission of an incomplete form will delay the review process. Before completing this form, sponsors are urged to carefully review the Committee's private travel guidelines and advisory memoranda detailing the rules and restrictions for private travel, as well as the instructions for completing this form. Sponsors should call the Committee with any questions prior to submitting the form. Please type form.</i>	
1. Sponsor(s) (who will be paying for the trip):	CARIB NEWS FOUNDATION

19. Later, on that same form, Mr. Rodney represented that "the trip sponsor(s) [had] not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip."⁷

15. I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s). (signify "yes" by checking box): <input checked="" type="checkbox"/>

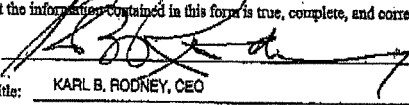
⁶ Private Sponsor Travel Certification Form signed by Karl A. Rodney (Oct. 3, 2008) (Exhibit 1 at 09-3698 0005).

⁷ *Id.* at 09-3698 0006.

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20. Rodney also certified that the information was "true, complete, and correct."⁸

23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.	
Signature:	
Name and title:	KARL B. RODNEY, CEO

21. Prior to the conference, the Standards Committee approved the reimbursement of Delegate Christensen's expenses by the Carib News Foundation.⁹

U.S. House of Representatives	
COMMITTEE ON STANDARDS OF OFFICIAL CONDUCT Washington, DC 20515	
October 16, 2008	
The Honorable Donna Christensen U.S. House of Representatives 1510 Longworth House Office Building Washington, DC 20515	
Dear Colleague:	
Pursuant to House Rule 25, clause 5(d)(2), the Committee on Standards of Official Conduct hereby approves your proposed trip for you and your spouse to St. Maarten, N.A. scheduled for November 6 to 8, 2008 sponsored by the Carib News Foundation.	

22. At the conference, several corporations, including Citibank, IBM, AT&T, and others, were identified as "sponsors."¹⁰
23. On November 7, 2008, the conference's organizer, Karl Rodney, began the first morning program by thanking Citigroup, Pfizer, Macy's, IBM, AT&T, the Verizon Foundation and American Airlines, as well as their executives by name, who were present.¹¹ This morning session was recorded by an individual attending the conference and the

⁸ Exhibit 1 at 09-3698 0007

⁹ Letter from the Committee on Standards of Official Conduct to Delegate Donna Christensen (Oct. 16, 2008) (Exhibit 1 at 09-3698 0004).

¹⁰ Photographs taken at the 13th Annual Caribbean Multi-National Business Conference (Exhibit 5 at Exhibit 1 at 09-3698 0070-0078) (The Board notes that the source of this information may have a bias, interest, or motive in this matter).

¹¹ Transcript of Recording of November 7, 2008 AM Session of the 13th Annual Caribbean Multi-National Business Conference (Exhibit 3 at 09-3698 0037- 09-3698 0039) (The Board notes that the source of this information may have a bias, interest, or motive in this matter).

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recording was subsequently transcribed. The OCE obtained a copy of the transcript. Mr. Rodney described AT&T as “support[ing] the Conference all 13 years” (this was the thirteenth annual conference).¹²

24. Michael Flanigan, an executive from Citibank, spoke immediately after Mr. Rodney and described Citibank as the “lead sponsor of the premier event.”¹³

25. Following Mr. Flanigan’s remarks, and the remarks of several other speakers, Representative Carolyn Cheeks Kilpatrick spoke. At the end of her remarks she stated, “[a]nd to the sponsors, by the way, all of you, we couldn’t do this, be with you, help Karl if you weren’t here with us so we say thank you very much, you are so important. To all of the sponsors, thank you very much.”¹⁴

26. In an interview with the OCE, Delegate Christensen confirmed she attended this session of the conference.¹⁵

27. In addition to these comments, signs for the conference displayed these corporations’ logos, including signs hung behind the speaker’s podium where the individuals spoke.¹⁶

¹² *Id.* at 09-3698 0037.

¹³ *Id.* at 09-3698 0039.

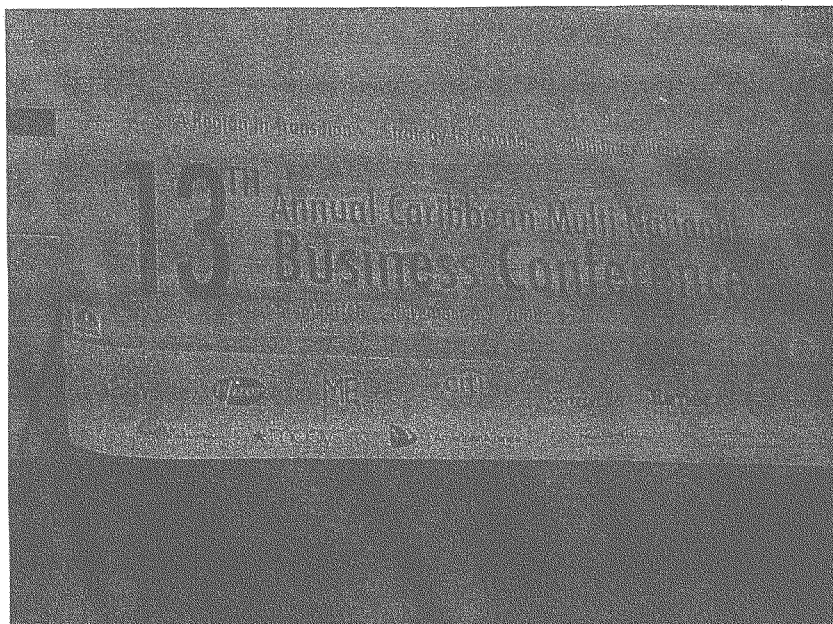
¹⁴ *Id.* at 09-3698 0054.

¹⁵ Memorandum of Interview of Delegate Donna Christensen (May 4, 2009) (Exhibit 2 at 09-3698 0034).

¹⁶ Photographs taken at the 13th Annual Caribbean Multi-National Business Conference (Exhibit 5 at 09-3698 0070).

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28. In her interview, Delegate Christensen stated when she arrived at the conference on Thursday she recalled seeing the banner and that a similar banner hung in all the conference rooms.¹⁷
29. After attending the morning session, Delegate Christensen confirmed that she participated in a "ribbon cutting" ceremony in which she and representatives from these corporations and the Leader of Government of St. Maarten, Commissioner Sarah Wescott-Williams stood for photographs. She is the individual partially photographed on the far right of the picture below.¹⁸

¹⁷ Memorandum of Interview of Delegate Donna Christensen (May 4, 2009) (Exhibit 2 at 09-3698 0033).

¹⁸ Photographs taken at the 13th Annual Caribbean Multi-National Business Conference (Exhibit 5 at 09-3698 0071).

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30. In an interview with the OCE, Delegate Christensen stated that she relied on the entity that invited her to the conference, the Carib News Foundation, to identify the sponsor of her trip and, further, that she relied on the Standards Committee, who pre-approved her trip, to determine if that information was accurate.¹⁹ As a result, Delegate Christensen told the OCE that the involvement of these corporations in the conference did not raise questions in her mind about whether the Carib News Foundation was the sole sponsor of the conference.²⁰ However, Delegate Christensen did acknowledge that she was aware that the corporate entities identified had some financial role in the conference.²¹ She did not know if they gave directly to the Foundation or to the conference. She also stated that the Government of St. Marten paid for a reception, which included food, that she attended.

¹⁹ Memorandum of Interview of Delegate Donna Christensen (May 4, 2009) (Exhibit 2 at 09-3698 0034).

²⁰ *Id.* at 09-3698 00035.

²¹ *Id.* at 09-3698 00033.

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31. The Board notes that the practice of relying entirely on the Standards Committee to determine the sponsor of a Member's travel carries with it a degree of risk. Further, while Members are required to receive pre-approval from the Standards Committee before they travel, it is the Member, and not the Standards Committee, that is ultimately accepting the travel from a private sponsor. The Board reads the pre-clearance process as a free-standing requirement the House adopted in 2007. There is no indication that the House intended it to supplant, or at the very least to completely supplant, Members' responsibility to abide by the travel rules when they accept privately sponsored travel. As a result, it is the Board's view that a reasonable reading of the travel rules places responsibility for identifying the sponsor with both the Member and the Standards Committee and not the Standards Committee alone. This shared responsibility also reflects the practical reality that, because the Member actually takes the trip, and the Standards Committee does not, the Member may, in certain circumstances, have access to information about the trip not available to the Standards Committee. In this instance, the Member had information about the sponsors of the conference not available to the Standards Committee, namely that numerous corporations were identified as sponsors of the conference.

32. Further, as described below, these other entities were, in fact, sponsors of the conference.

B. CARIB NEWS also Sponsored Delegate Christensen's Travel

33. Karl Rodney is the publisher of the CARIB NEWS, a weekly newspaper published in New York. He also identified himself as the CEO of the Carib News Foundation on the Private Sponsor Travel Certification described above.²²

34. According to Mr. Rodney, "general funds" of CARIB NEWS were "pooled" with payments from corporate sponsors, made both to CARIB NEWS and the Carib News Foundation and fees from attendees at the conference to pay conference expenses including "travel" and "hotel payments."²³

35. Therefore, CARIB NEWS was also effectively a sponsor of Delegate Christensen's trip.

C. Corporate Donations Were Earmarked for the Conference

36. *According to the House Ethics Manual:*

²² Private Sponsor Travel Certification Form signed by Karl Rodney (Oct. 3, 2008) (Exhibit 1 at 09-3698 0007).

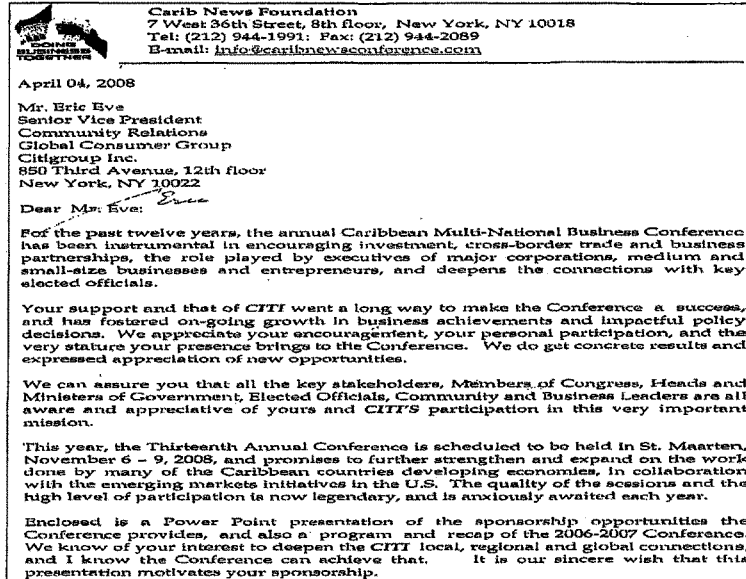
²³ Letter from Joel Cohen, Counsel for Karl Rodney (May 18, 2009) (Exhibit 6 at 09-3698 0081).

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The rule and implementing regulations are concerned with the organization(s) or individual(s) that actually pay for travel. Thus, for example, when a nonprofit organization pays for travel with donations that were earmarked, either formally or informally, for the trip, each such donor is deemed a —private source for the trip and (1) must be publicly disclosed as a trip sponsor on the applicable travel forms and (2) must itself be required to satisfy the above standards on proper sources of travel expenses.

37. In the course of conducting its review, the OCE has learned that the Carib News Foundation solicited earmarked funds for the conference. For example, Carib News Foundation sent a solicitation letter to Citigroup, Inc.²⁴



38. Attached to this solicitation letter was a PowerPoint presentation.²⁵ The presentation solicits money only for the conference and not for any other purpose, outlining the

²⁴ Letter from Carib News Foundation to Mr. Eric Eve, Citigroup, Inc. (Apr. 4, 2008) (Exhibit 7 at 09-3698 0085) (a nearly identical letter was sent to IBM, AT&T, Pfizer, Verizon Foundation and others).

²⁵ *Id.* at 09-3698 0088-0102

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benefits of each level of sponsorship – Platinum, Gold, and Silver, along with lesser levels of sponsorship – in terms of the conference.²⁶ In each instance, the sponsorship covers travel related expenses such as gala events and meals.

PARTICIPATION

PLATINUM LEVEL - \$75,000

- ◆ Keynote Speaker at Main Event
- ◆ Sponsor Private VIP Reception and specially arranged forum
- ◆ Special Awards Presentation
- ◆ Display, Exhibition and signage
- ◆ Area of Conference - Reserved for exclusive sponsorship
- ◆ Full page Ad in program
- ◆ Air Transportation for 2 people
- ◆ Accommodations: One Suite and One Standard Room
- ◆ Included in all printed materials
- ◆ Included in Internet promotion
- ◆ Display company logo and link to our website
- ◆ Sponsor of a Gala Event
- ◆ Sponsor and Participate in a workshop
- ◆ Representative listed in program with bio and photo

²⁶ *Id.* at 09-3698 0095-0098

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PARTICIPATION

GOLD LEVEL - \$50,000

- ◆ Sponsor a Workshop
- ◆ Sponsor a Gala Event
- ◆ Display, Exhibition and signage
- ◆ Included in all Printed Material
- ◆ Included in all Internet Promotion
- ◆ Display of Company Logo and Link to Our Website
- ◆ Full Page Ad in Program
- ◆ Representation in the Brochure
- ◆ Air Transportation & room accommodations for 1

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PARTICIPATION

SILVER LEVEL - \$25,000

- ◆ Sponsor & Participate in a Workshop
- ◆ Display and Exhibition
- ◆ Banner in Public areas & at workshop
- ◆ Included in all printed materials
- ◆ Included in Radio and TV Promotions
- ◆ Included in the internet promotion
- ◆ Sponsor an event i.e. breakfast, lunch or dinner
- ◆ Full Page ad in program and recap
- ◆ Representatives listed in program with bio & photos
- ◆ Representatives listed in brochure

39. The OCE also learned that at least four of the corporations identified at the conference did in fact, make payments to the Carib News Foundation and CARIB NEWS (the newspaper) earmarked for the conference. The Carib News Foundation itself appears to

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be nothing more than a conduit in this case, and a partial one at that, for payments from corporations to support the conference. There is no evidence that the organization has filed a tax return with the IRS, under either Carib News Foundation or Carib News Charities, since 2005.²⁷ On its 2005 Form 990, the Carib News Foundation is shown as having no assets, no income and no expenses.²⁸ Not a single witness from a sponsor interviewed by the OCE knew of any other work of the Foundation. Indeed one witness, from IBM, was not aware that the Foundation played a role in the conference.²⁹

40. **Citigroup.** Citigroup made a \$75,000 payment to the CARIB NEWS for the conference.³⁰

41. **Verizon Foundation.** Verizon Foundation made a \$35,000 payment to the Carib News Charities³¹ for the conference.³²

²⁷ Letter from IRS to OCE (April 17, 2009) (Exhibit 8 at 09-3698 0107).

²⁸ *Id.* at 09-3698 0108-0119.

²⁹ Memorandum of Interview of the Representative of IBM (May 8, 2009) (Exhibit 9 at 09-3698 0123).

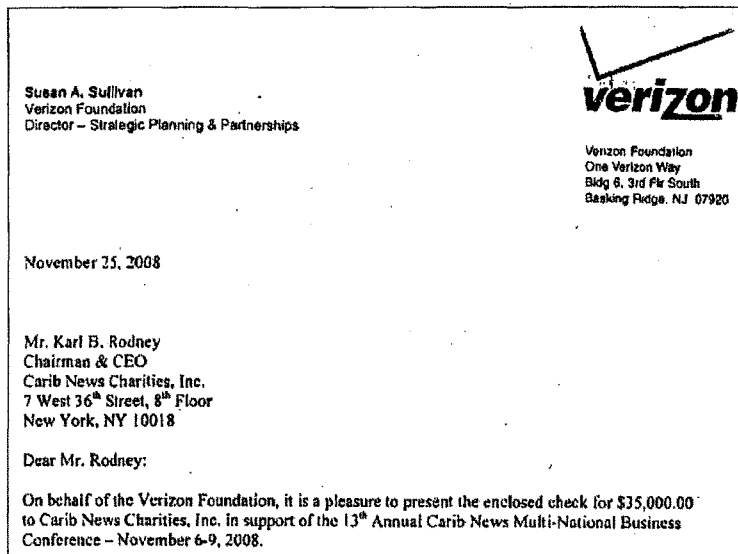
³⁰ Documents submitted to the OCE by Citigroup (Exhibit 7 at 09-3698 0084).

³¹ Mr. Rodney accepted corporate payments under the names of three entities: The Carib News, the Carib News Foundation, and the Carib News Charities. According to the Secretary of State for the State of New York, the organization that currently operates as the Carib News Foundation originally operated under the name the Carib News Charities.

³² Documents Submitted to the OCE by Verizon Foundation (Exhibit 10 at 09-3698 0127).

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42. Representative 1 of the Verizon Foundation said the Verizon Foundation funded the Carib News Foundation for the first time in 2008 and that the grant was issued to provide funding for the 13th Annual Caribbean Multi-National Business Conference.³³

43. **IBM.** IBM made a \$20,000 payment to Carib News Foundation for the conference as indicated on the invoice that CARIB NEWS, INC. (not Carib News Foundation) sent IBM.³⁴

³³ Memorandum of Interview of Representative 1 of Verizon Foundation (Mar. 23, 2009) (Exhibit 11 at 09-3698 0133).

³⁴ Documents submitted by IBM to the OCE (Exhibit 13 at 09-3698 0150).

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CARIB NEWS INC. 7 WEST 36TH STREET 8TH FLOOR NEW YORK, 10018 212-944-1991		Invoice					
		<table border="1"> <tr> <th>Date</th> <th>Invoice #</th> </tr> <tr> <td>7/16/2008</td> <td>45122</td> </tr> </table>	Date	Invoice #	7/16/2008	45122	
Date	Invoice #						
7/16/2008	45122						
<table border="1"> <tr> <th colspan="2">Bill To</th> </tr> <tr> <td colspan="2"> Wanda McKezle IBM 2607 Justers Court Marietta, GA 30068 </td> </tr> </table>				Bill To		Wanda McKezle IBM 2607 Justers Court Marietta, GA 30068	
Bill To							
Wanda McKezle IBM 2607 Justers Court Marietta, GA 30068							
		<table border="1"> <tr> <th>Description</th> <th>Amount</th> </tr> <tr> <td>Sponsorship Multi-National Business Conference 2008 TAX ID 13-362860</td> <td style="text-align: right;">20,000.00</td> </tr> </table>		Description	Amount	Sponsorship Multi-National Business Conference 2008 TAX ID 13-362860	20,000.00
Description	Amount						
Sponsorship Multi-National Business Conference 2008 TAX ID 13-362860	20,000.00						

44. **Macy's.** Macy's made a \$35,000 payment to CARIB NEWS for the conference.³⁵
45. **Pfizer.** Pfizer made a \$25,000 payment to CARIB NEWS for the conference.³⁶
46. Only American Airlines explicitly limited their sponsorship of the conference to individuals who were not elected officials, prohibiting CARIB NEWS from using any part of their sponsorship on Members of Congress and other government officials and their staff.³⁷ No other sponsor with whom we spoke placed restrictions on how or on whom their contribution could be spent.³⁸ The only expectation was that the contribution would be used for expenses associated with the conference.

³⁵ Memorandum of Interview of Representative 1 of Macy's (Exhibit 20 at 09-3698 0241)

³⁶ Interview with Investigative Counsel on May 22, 2009.

³⁷ Documents submitted by American Airlines to the OCE (Exhibit 14 at 09-3698 0153-0157) and OCE Investigative Counsel interview with American Airlines Representative (Mar. 5, 2009) (American Airlines provided an in-kind contribution in the form of ten roundtrip tickets to be used by Carib News in any manner they chose with the exception that no ticket could be used for an elected official or the official's staff or family. The estimated value of their contribution was between \$6,200 and \$7,500).

³⁸ Memorandum of Interview of Representative of IBM (Exhibit 9 at 09-3698 0123); Memorandum of Interview of Representative 2 of the Verizon Foundation (Exhibit 12 at 09-3698 0145); Memorandum of Interview of Representative of Citi (Exhibit 4 at 09-3698 0065); Memorandum of Interview of Representative 1 of Macy's (Exhibit 20 at 09-3698 0241).

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D. Because Entities that Employ or Retain Lobbyists Sponsored the Event, Delegate Christensen's Involvement Should Have Been Limited to One Day

47. According to the House Ethics Manual:

One-Day Event Trip. The sole exception to the general prohibition on accepting officially-connected travel from a private source that retains or employs lobbyists or agents of a foreign principal is for trips involving attendance at or participation in one-day event (exclusive of travel time and an overnight stay).

Under the rule, it is permissible for a Member or staff person to accept and meals related to a single night's lodging and meals related to the trip, if offered by the trip sponsor. Members and staff must limit their involvement in connection with the event to a single calendar day, exclusive of travel time and an overnight stay. A Member or staff person may therefore attend only a single day of a multiple-day conference, forum, or other event that is being hosted primarily for individuals other than congressional invitees.

Under the Committee's travel regulations and guidelines implementing the travel provisions of the gift rule, the Committee may permit a second night's stay when determined —on a case-by-case basis to be practically required to participate in the one-day event (House Rule 25, clause 5(b)(1)(C)). Some circumstances in which the Committee may permit a second night's stay are for certain long-distance trips, when a Member or staff person is participating in a full day's worth of officially-connected activities such that a second night's stay is necessary to accomplish the purpose of the trip; or other exceptional circumstances that are described in detail by the traveler. The traveler will be personally responsible for any expenses incurred beyond those allowed by the Committee in connection with the second night's stay.³⁹

48. Citigroup, IBM and Verizon employ or retain lobbyists.⁴⁰

49. Delegate Christensen spent three days at the conference.⁴¹

³⁹ House Ethics Manual at 92-93 citing (House Rule 25, clause 5(b)(1)(C)) (emphasis in original).

⁴⁰ Clerk of the House of Representatives Lobbying Disclosure Report 2008 (excerpt) (Exhibit 15 at 09-3698 0159-0164).

⁴¹ Member/Officer Post-Travel Disclosure Form signed by Delegate Donna M. Christensen (Dec. 22, 2008) (Exhibit 1 at 09-3698 0002-0003).


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50. There is substantial reason to believe that Delegate Christensen violated *House Rule 25, clause 5(b)(1)(C)* by accepting trip-related reimbursements from entities that employ or retain lobbyists for participating in an event for more than one day.

E. The Government of St. Maarten Made In-Kind Donations to the 2008 Conference and Played a Significant Role in Planning, Organizing and Conducting the 2008 Conference

51. The Government of St. Maarten was the host of the 2008 conference and the Leader of Government of St. Maarten personally invited Delegate Christensen to attend.⁴²

 <h2 style="margin: 0;">Government of Sint Maarten</h2> <p style="margin: 0;">Sarah Wescot-Williams, M.Sc.</p>	
<p>Telephone: (599) 543-1166</p> <p>Fax: (599) 542-4292</p> <p>E-mail: comed@sintmaarten.net</p>	<p>St. Maarten, August 28, 2008</p> <p>Congresswoman Donna M. Christensen U.S House of Representatives 1510 Longworth HOB Washington, DC 20515 Phone: 202-225-1790 Fax: 202-225-3517</p> <p>Honorable Congresswoman Christensen,</p> <p>The well-known Carib News Foundation has once more chosen our island, St. Maarten, as venue for its 13th Annual Caribbean Multi-National Business Conference scheduled to be held from November 6 – 9, 2008 at the Sponesta Maho Beach Resort & Casino. The conference is being held under the theme: "A Region in Transition – Strategy for Change, Alliance for Progress".</p>

52. In that capacity, it provided in-kind donations to support the conference and also had a substantial role in planning the conference. As a result, it was effectively a sponsor of the 2008 conference.⁴³

⁴² Letter from Leader of Government of St. Maarten, Commissioner Sarah Wescot-Williams, to Delegate Donna Christensen (Aug. 28, 2008) (Exhibit 1 at 09-3698 0011).

⁴³ In 2007, the "host" of the conference was the Government of Antigua and Barbuda. In the event that the Government of Antigua and Barbuda provided the same support as St. Maarten did in 2008, then the members may have accepted gifts from a foreign government which would have been reportable under the Foreign Gift and Decorations Act. In addition, if the Government of Antigua provided these gifts to the Members, and if they were more than \$335 in value, then the Members should have disclosed them on their financial disclosure form for 2007, which was filed in May 2008.

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53. Rodney provided the Leader of Government of St. Maarten, Commissioner Sarah Wescott-Williams, with a list of "Basic Requirements to Host Caribbean Multi-National Business Conference."⁴⁴ These included:

- To provide the care and comfort for the VIP's attending Le.
 - To provide 25 all-inclusive rooms for the VIP's and members of Congress attending;
 - To provide appropriate mode of transportation for VIP's and members of Congress - cars or specialized vans - not buses;
- To have a designated sponsor in one of the categories: *Title, Main, or Regular Sponsor* (See Attachment);
- To organize a "Host Country Evening" - The Friday evening, the host country will host at an appropriate location an evening of food, refreshment, cultural presentation and entertainment.
- Provide for local entertainment for the various functions:
 - The Opening Ceremonies
 - The Reception
 - The Gala Dinner
- To assist in Promotion and Publicity of the conference both locally and through international offices and official publications;
- Assist in securing competitive hotel rates;
- Equip and staff conference secretariat.
- Prime Minister to issue invitations along with CARIB-NEWS to members of the US Congress, other Prime Ministers and Ministers of Government.
- Participate in the Forum with Members of Congress.
- Arrange tours and activities of interest for VIP's and/or their spouse.

54. According to a statement from Mr. Rodney submitted to the OCE, the Government of St. Maarten, (1) developed local Host Committees to facilitate local planning; (2) helped negotiate the rate with the hotel, (3) assisted in developing the theme of the Conference, (4) assisted in identifying local speakers, including the Leader of Government, (5) assisted in local publicity, (6) provided local entertainment, including a school choir and cultural items, (7) arranged Host Country Evening on Friday, November 8 (the whole

⁴⁴ Letter from Karl Rodney to Commissioner Sarah Wescott-Williams (Aug. 13, 2008) (Exhibit 16 at 09-3698 0166).

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group was transported to another property for refreshments and entertainment), (8) helped with local transportation for some CARIB NEWS employees and helped arrange accommodations for some guests (not paying for such accommodations), (9) participated as event speakers, and (10) issued invitations to attend to specially invited guests.”⁴⁵ These contributions to the conference were all in-kind, according to Mr. Rodney, and he did not provide an estimated value for them.⁴⁶

55. In addition, because these donations to the conference are from a foreign government, Members are required to take certain actions under the Foreign Gifts and Decorations Act.⁴⁷

56. Delegate Christensen told the OCE that the Government of St. Maarten plays a number of roles in the conference, including participating in holding the conference.⁴⁸

III. Role of the Chair’s Counsel in the Approval of the 12th Annual Caribbean Multi-National Business Conference in 2007

57. As previously stated, Delegate Christensen told the OCE that she relied on the Standards Committee to determine who the true sponsor of the conference was based on information the Standards Committee received from the organization that invited her to the conference—the Carib News Foundation.⁴⁹ In the course of the Board’s review, the OCE requested documents from Mr. Karl Rodney, the CEO of the Carib News Foundation. Mr. Rodney voluntarily submitted documents to the OCE that included, among other things, communication with certain members of the staff of the Committee on Standards of Official Conduct in 2007. The contents of these documents from 2007 are relevant because they indicate the role of the corporations was concealed from the Committee in 2008.

58. The Board requested that the Committee provide the information submitted to it for 2008 and the Committee declined to do so.

59. The documents submitted by Mr. Rodney show that in 2007 the CARIB NEWS initially identified, on several occasions, other corporations as sponsors of the Conference. The designation of these corporate entities as sponsors presented a problem for CARIB

⁴⁵ Letter from Joel Cohen, Counsel for Karl Rodney (May 18, 2009) (Exhibit 6 at 09-3698 0080-0081).

⁴⁶ *Id.*

⁴⁷ 5 U.S.C. § 7342.

⁴⁸ Memorandum of Interview of Delegate Donna Christensen (May 4, 2009) (Exhibit 2 at 09-3698 0031).

⁴⁹ *Id.* at 09-3698 0030-0035.

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NEWS and the Members who wished to attend the conference insofar as their attendance would be limited to one day. In 2007, as a result of changes in the travel rules, a Member could not, in most instances, participate in an event (such as a conference) for more than one day if their travel to and participation in the event was paid for by an entity that employed or retained a lobbyist.⁵⁰ Many of the corporate entities who sponsored the 2007, as well as the 2008 conference, employed or retained lobbyists. Although CARIB NEWS initially identified these entities as sponsors, following interactions with the counsel to the then-chair of the Committee, apparently without the knowledge of the Standards Committee staff attorney assigned to review the trip, the documents identifying these organizations as sponsors were changed.

60. Subsequently, in 2008, the Carib News Foundation submitted documents that omitted the role of these other corporations as sponsors of the conference. Further, the staff attorney assigned to review the trip in 2008 was not the same staff attorney that reviewed the trip in 2007.
61. The earliest communication between CARIB NEWS or the Carib News Foundation and anyone associated with the Ethics Committee in the documents submitted to the OCE from Mr. Rodney is an e-mail dated September 17, 2007 from Patricia Louis, an Executive Assistant at CARIB NEWS, to Dawn Kelly Mobley, Counsel to the then-Chair of the Ethics Committee.⁵¹
62. The next day, on September 18, 2007, Ms. Mobley responded and asked for “any information on your sponsor’s status.”⁵²
63. That same day Ms. Louis responded, indentifying multiple corporations as “sponsors” of the trip.⁵³

⁵⁰ House Ethics Manual (2008) at 92-93 (citing House Rule 25, clause 5(b)(1)(C)).

⁵¹ E-mail from Patricia Louis to Dawn Kelly Mobley (Sept. 17, 2007, 3:47 PM EST) (Exhibit 17 at 09-3698 0213) (The Board elected not to interview Ms. Mobley and Ms. Olson because the Standards Committee voted against disclosing information to the OCE. The Board determined that it would have been an act of bad faith on the part of the OCE to attempt to interview staff and former staff of the Standards Committee in light of the Committee’s refusal to grant OCE access to their records.)

⁵² E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 18, 2007, 12:57 PM EST) (Exhibit 17 at 09-3698 0213).

⁵³ E-mail from Patricia Louis to Dawn Kelly Mobley (Sept. 18, 2007) (Exhibit 17 at 09-3698 0213) (The Board notes that while the document that contains the e-mail does not have a header which indicates a date and time, both the e-mail before it and responding to it are dated September 18, 2007).

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We had received the forms from Shelley.
The sponsors to date are : MACYS, PFIZER, AMERICAN AIRLINES, GOLDEN KRUST
BAKERY, CARIBBEAN FOOD DELIGHTS, PREFERRED HEALTH PARTNERS, IBM,
AT&T/CINGULAR

Regards

Patricia Louis
Executive Assistant
CARIB NEWS
7 West 30th Street, 8th Floor
New York, NY 10018

64. In response that same day, Ms. Mobley asked, “[d]o any of these organizations have or retain a lobbyist?”⁵⁴
65. The next day, Ms. Mobley further responded asking Ms. Louis whether she, Ms. Mobley, should “assume” the sponsor was CARIB NEWS, despite the fact that Ms. Louis had not identified CARIB NEWS as a sponsor.⁵⁵ The Board notes that in her e-mail, Ms. Louis did not identify CARIB NEWS as a sponsor. Further, Ms. Mobley acknowledged that she had been told corporations identified by Ms. Louis were “sponsoring food and other parts of the Antigua travel.” Under House rules in place at the time, and under current rules, sponsoring a meal makes these corporations sponsors of a Member’s travel.⁵⁶ The Board also notes Ms. Mobley’s use of the phrase “safe review,” which the Board takes to mean a review which results in approval of the trip.

⁵⁴ E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 18, 2007, 7:03 PM EST) (Exhibit 17 at 09-3698 0212).

⁵⁵ E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 19, 2007, 2:16 PM EST) (Exhibit 17 at 09-3698 0212).

⁵⁶ House Ethics Manual (2008) at 97-98.

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From: Kelly Mobley, Dawn
 Sent: Wednesday, September 19, 2007 2:16 PM
 To: 'plouis'
 Subject: RE: Draft Program - 2007 Business Conference (No agenda or program attached)

Patricia:

I understand that several organizations will take part in sponsoring food and other parts of the Antigua travel. However, I need clarification on the *official* sponsor; that organization providing travel, lodging, and organizing the trip? Am I to assume it is CARIB NEWS? The *official* sponsoring organization must not retain or employ a registered lobbyist or registered foreign agent (and the sponsor must have a direct and immediate relationship with the event or location being visited). To assist with this, I am scanning information/guidelines and emailing in just a moment. Please provide a fax number if that method of submittal will be more helpful. If there is someone handling this matter, please provide me their direct contact information as I must ensure adherence to these new guidelines pre-travel.

In any event, I do need to know who the *official* sponsor will be. I have assigned a staff attorney to review your documents and will remain in contact with you until this matter is finalized.

Please respond today or tomorrow at the latest. I will be traveling for a while thereafter and must ensure that my staff attorney has all that is necessary for a safe review.

Dawn Kelly Mobley
 Ethics Counsel for Congresswoman Stephanie Tubbs Jones
 Chairwoman, Committee on Standards of Official Conduct
 U.S. of Representatives
 Washington, DC 20515
 202/226-7103

66. Later in the afternoon on September 19, 2007, Ms. Mobley sent Ms. Louis another e-mail where she discussed the limitations posed by the new travel rules the House had adopted in 2007. Ms. Mobley told Ms. Louis, "the new rules might prohibit some things you were able to do with so many different sponsors in the past." Thus, Ms. Mobley again acknowledged that these corporations were sponsors and that the new travel rules affected the nature of their participation in the trip.⁵⁷

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
 Sent: Wednesday, September 19, 2007 3:23 PM
 To: plouis
 Subject: RE: Draft Program - 2007 Business Conference (No agenda or program attached)

Lastly, just send the sponsor form asap for review. The new rules might prohibit some things you were able to do with so many different sponsors in the past, but until we get the form, we can't make the most informed decision. I have let the Congresswomen know we are awaiting your sponsor form. Just as you do, they would also like assurance. Thank you.

67. On September 21, 2007, Ms. Louis responded.⁵⁸

⁵⁷ E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 19, 2007, 3:23 PM EST) (Exhibit 17 at 09-3698 0212).

⁵⁸ E-mail from Patricia Louis to Dawn Kelly Mobley (Sept. 21, 2007, 1:56 PM EST) (Exhibit 17 at 09-3698 0210).

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Registration
From: plouis [plouis@nycaribnews.com]
Sent: Friday, September 21, 2007 1:56 PM
To: 'Dawn.KellyMobley@mail.house.gov'
Subject: Re Sponsorahp Information
<p>The official sponsor of the conference is the CARIB NEWS FOUNDATION, a not-for-profit 501C3 Organization that provides educational information about the Caribbean Region and its relationship with the US in doing business and developing good neighborly ties with the United States, security, health, education etc.</p>
<p>The CARIB NEWS FOUNDATION does not retain or employ a registered lobbyist or registered foreign agent.</p>
<p>Please use me as your contact for the purposes of this Conference.</p>
<p>The form will be emailed to you this afternoon.</p>
<p>Regards <i>Patricia Louis</i></p>
<p>Executive Assistant CARIB NEWS 7 West 38th Street, 8th Floor New York, NY 10018</p>

68. That same day, on September 21, 2007, Ms. Louis faxed Ms. Mobley a Private Sponsor Travel Certification Form. On the form Carib News Foundation is listed as the sponsor of the trip in question 1.⁵⁹

⁵⁹ Private Sponsor Travel Certification Form (Sept. 21, 2007) (Exhibit 17 at 09-3698 0200).

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<p>U.S. House of Representatives Committee on Standards of Official Conduct</p> <p>PRIVATE SPONSOR TRAVEL CERTIFICATION FORM (provide directly to each House invitee)</p> <p>This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers or employees under House Rule XXV, clause 5. A completed copy of this form (and any attachments) should be provided to each invited House Member, officer or employee, who will then forward it to the Committee. The trip sponsor should NOT submit the form directly to the Committee.</p> <p>Private sponsors are urged to submit this form to each House invitee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the invitee not receiving approval for the trip. The submission of an incomplete form will delay the review process. Before completing this form, sponsors are urged to carefully review the Committee's private travel guidelines and advisory memoranda detailing the rules and restrictions for private travel, as well as the instructions for completing this form. Sponsors should call the Committee with any questions prior to submitting the form. <i>Please type form.</i></p> <p>Carib News Foundation</p> <p>1. Sponsor(s) (who will be paying for the trip): _____</p>
--

69. However, the Carib News Foundation listed a number of corporations as private sponsors, each with responsibility for planning and conducting the trip, in question 12.⁶⁰ This is at least the second instance where the Carib News Foundation identified these corporations as the trip's sponsors.

<p>12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip: Pfizer Education/Health AT&T and IBM: provide technology to the region, MACYS: seeks new vendor sources, Citibank: opportunities in the region.</p>
--

70. This prompted the following e-mail from Ms. Mobley to Ms. Louis.⁶¹ The Board notes that Ms. Mobley stated she was "working through" the Carib News Foundation's forms "before leaving them with our staff attorney."

⁶⁰ *Id.* at 09-3698 0201.

⁶¹ E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 25, 2007, 12:42 PM EST) (Exhibit 17 at 09-3698 0197).

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

From: Kelly Mobley, Dawn
 Sent: Tuesday, September 25, 2007 12:42 PM
 To: 'Louis'
 Subject: Query

I am working through your forms before leaving them with our staff attorney and have a question. Query: Why did you not list CARIB NEWS as the sponsor as you indicated instead of Macy's, etc. The official sponsor for travel, lodging, and planning is still Carib News, correct?

71. Later that same day, Ms. Mobley queried further.⁶² At least as of this date, following at least two instances where Ms. Louis identified these corporations as sponsors, Ms. Mobley appeared to treat these entities as "co-sponsors."

From: Kelly Mobley, Dawn
 Sent: Monday, October 01, 2007 5:08 PM
 To: Kelly Mobley, Dawn
 Subject: RE: Query

We are trying to work through a problem in approving the co-sponsors plea. Are they each paying for a one-day, widely attended event or more days? Please read the Gift Rules I forwarded you on this matter.

72. On October 3, 2007, Ms. Mobley informed Ms. Louis that Susan Olson was the staff attorney assigned to review the trip.⁶³
73. A copy of the Private Sponsor Travel Certification Form provided to a Member's office on October 5, 2007, shows that by October 5, 2007, following its interaction with Ms. Mobley, Carib News Foundation changed its answer to question 12 regarding other private sponsors. As previously highlighted, as of September 21, 2007, Carib News Foundation provided the following answer to question 12.⁶⁴

12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip. Pfizer-Education/Health AT&T and IBM - provide technology to the region. MACYS - seeks new vendor sources, Citibank opportunities in the region.

74. However, as of October 5, 2007, it provided a different answer to question 12.⁶⁵

⁶² E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 25, 2007, 5:08 PM EST) (Exhibit 17 at 09-3698 0197).

⁶³ E-mail from Dawn Kelly Mobley to Patricia Louis (Oct. 3, 2007, 12:39 PM EST) (Exhibit 17 at 09-3698 0194).

⁶⁴ Private Sponsor Travel Certification Form (Sept. 21, 2007) (Exhibit 17 at 09-3698 0201).

⁶⁵ Private Sponsor Travel Certification Form (Oct. 5, 2007) (Exhibit 18 at 09-3698 0216).

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<p>12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip:</p> <p>CARIB NEWS FOUNDATION (SEE ATTACHED SHEET)</p>
--

And the attached sheet provided the following information.⁶⁶

<p>Item #12</p> <p>CARIB NEWS FOUNDATION is organized to provide education and information about the Caribbean in the area of Business, Education, Health and Culture. Promote Good neighborly within the United States and the hemisphere.</p>

On October 10, 2007, Susan Olson, the staff attorney on the Standards Committee assigned to review the trip e-mailed Ms. Louis the following questions⁶⁷ (and copied Ms. Mobley and the Chief Counsel of the Standards Committee at that time, Bill O'Reilly). While the Private Sponsor Travel Certification Form for the trip had been changed by this date, the draft agenda for the conference apparently had not and still showed corporate sponsors for various events. What Ms. Olson does not appear to be aware of is the fact that Carib News Foundation had previously identified the same corporations she is raising questions about as private sponsors on its original Private Sponsor Travel Certification form.

<p>Original Message</p> <p>From: Olson, Susan (mailto:susan_olson@mail.house.gov)</p> <p>Sent: Wednesday, October 10, 2007 4:01 PM</p> <p>To: plouis@nycaribnews.com</p> <p>cc: Dawn, Kelly Mobley@mail.house.gov; O'Reilly, Bill</p> <p>Subject: Carib News - Pre-trip Approval Issues</p> <p>Dear Mrs. Louis:</p> <p>With regard to the pre-trip approval requests for the Carib News Foundation's</p>
--

⁶⁶ *Id.* at 09-3698 0220.

⁶⁷ E-mail from Susan Olson to Patricia Louis (Oct. 10, 2007, 4:01 PM EST) (Exhibit 17 at 09-3698 0182-0183).

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(Foundation) trip to Antigua, the issues involving sponsorship are as follows:

While the sponsor form that you completed indicates that the Foundation is the sole sponsor of the 2007 trip, the draft schedule, however, indicates that the following entities are "sponsoring" sessions, events, etc. during this trip:

- o Antigua Government
- o Sandals
- o Royal Caribbean Bakery
- o Citi
- o Pfizer
- o Macy's
- o AT&T
- o H&M
- o IBM
- o Goodworks International
- o Preferred Health Partners
- o Antigua & Barbuda
- o American Airlines
- o Golden Krust

Last year the Foundation provided the following information regarding these "additional sponsors" for the November 9 to 12, 2006 trip:

The Foundation, which is a 501(c)(3) nonprofit organization, will be paying for the Members' travel expenses, including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a "contribution to the overall pool of expenses in contribution to the Foundation" which is used to "underwrite the overall expenses of the Conference," primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organization who will be attending and participating in the Conference.

Accordingly, the Committee's Advisory Opinion, dated October 27, 2006, provided that all of the organizations that provided financial underwriting for the trip along with the Foundation were required to be listed as the "trip sponsors" on the participating Members' post-travel disclosure form and their 2006 annual financial disclosure statements.

Accordingly, you need to provide information describing the role of these "additional sponsors" as listed in the 2007 trip draft schedule for this current trip. Without such information, I cannot proceed with the review of the pre-trip approval requests for the Foundation's Antigua trip.

Susan L. Olson

Counsel

House Committee on Standards of Official Conduct

75. The Committee's Advisory Opinion dated October 27, 2006 indicates, as Ms. Olson wrote, that Carib News Foundation told the Standards Committee in 2006 that there were several corporate entities that sponsored the conference.⁶⁸ The "Advisory Opinion" did not conclude that these entities were, in fact, the trip's sponsors, as the e-mail seems to indicate.

⁶⁸ Committee on Standards of Official Conduct, Advisory Opinion (Oct. 27, 2006) (Exhibit 17 at 09-3698 0206-0208).

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76. A draft agenda for the conference dated October 3, 2007, identified a “sponsor” for each event listed.⁶⁹ This appears to be the version of the agenda that Olson is referring to in her e-mail. For example, “Preferred Health Partners” is identified as the sponsor of this event on “Port & Airport Security—The Mandates.”⁷⁰

PORT & AIRPORT SECURITY - THE MANDATES	
Moderator	Lance Digirola Hon. Bernice Thompson
Chair	Dr. Basil Wilson
Venue	
Sponsor	Preferred Health Partners

And Citi is identified as the sponsor of this event on “Community Outreach – Education – Access and Collaboration.”⁷¹

4:00pm - 5:30pm - COMMUNITY OUTREACH - EDUCATION - ACCESS AND COLLABORATION	
Venue	Off Site
Sponsor	CITI
Moderator	Michael Flanigan
Speakers	Dr. Edison Jackson - President Medgar Evers College Hon. Danny Davis - Member of Congress Hon. David M. Dinkins - Former Mayor New York City Hon. Eddie Bernice Johnson - Member of Congress Hon. Bertrand Joseph

⁶⁹ Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 3, 2007) (Exhibit 19 at 09-3698 0222-0238).

⁷⁰ *Id.* at 09-3698 0228

⁷¹ *Id.* at 09-3698 0234

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77. Ms. Louis forwarded Ms. Olson's e-mail to Ms. Mobley, Congressman Charles Rangel's Chief of Staff George Dalley and Delegate Donna Christensen's scheduler Shelley Thomas, and asked them to advise her on a response.⁷³

Original Message
 From: plouis@nyeaibpws.com
 To: Kelly Mobley, Dawn Thomas, Shelley Dalley, George
 Sent: Wed Oct 10 3:56:25 2007
 Subject: FW: Carl News: Pre-trip Approval Issues

Please see e-mail I received from Ms. Olson of the Committee on Standards of Official Conduct.

A possible response could be: The sponsors contribute to the overall expense of the trip and the general work of the Foundation. As a courtesy, each contributor is given an opportunity to be attached to a part of the program that is being presented. They do not determine the content or the other participants in the Conference.

Please advise us.

Regards and Thanks

Ms. Louis appears to be pre-clearing her response to questions posed by the Standards Committee staff attorney. There is no indication that the staff attorney knew that the answer to her question had already been discussed with the counsel to the then-chair of the Standards Committee. Substantively, based on documents obtained by the OCE and interviews with sponsors, the statement "the sponsors contribute to the overall expense of the trip" appears to be true. However, the statement "and the general work of the Foundation," does not appear to be true. All of the sponsors OCE interviewed stated unequivocally that the contribution was intended for the conference.⁷³

⁷² E-mail from Patricia Louis to Dawn Kelly Mobley, George Dalley, and Shelley Thomas (Oct. 10, 2007, 5:56 PM EST) (Exhibit 17 at 09-3698 0188).

⁷³ Memorandum of Interview of Representative of IBM (May 8, 2009) (Exhibit 9); Memorandum of Interview of Representative 1 of the Verizon Foundation (Mar. 23, 2009) (Exhibit 11); Memorandum of Interview of Representative of Citi (Mar. 17, 2009) (Exhibit 4); Memorandum of Interview of Representative 1 of Macy's (May 28, 2009) (Exhibit 20).

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78. Less than an hour later Ms. Mobley responded.⁷⁴ The Board notes Ms. Mobley's concern with whether any of the corporate sponsors paid for an event and also retained a lobbyist" and her conclusion that if they did, Members of Congress could only attend for one day.

Registration	
From:	Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent:	Wednesday, October 10, 2007 6:49 PM
To:	plouis@nycafbnews.com
Subject:	Re: Carib News - Pre-trip Approval Issues
<p>For question comes on whether any of these "co-sponsors" retains a lobbyist or foreign. This is the issue you and I focused on previously. It is a central problem if any do and are paying for the events. If so, you are in the same position as last year with one-day events. Call Susan back tomorrow as early as possible. Hopefully, these co-sponsors don't retain lobbyists, but you should have their representations on this matter. At a minimum, Macy's does, right? Alternatively, if they are only sponsoring event tables or the like, a lobbyist will not be problematic.</p>	
Sent using BlackBerry	


79. Ms. Louis then faxed Ms. Mobley.⁷⁵ The Board notes that Ms. Louis again appears to be pre-clearing her responses to the staff attorney, Ms. Olson, with Ms. Mobley ("Kindly review and advise before I send to Ms. Olson.").

⁷⁴ E-mail from Dawn Kelly Mobley to Patricia Louis (Oct. 10, 2007, 6:49 PM EST) (Exhibit 17 at 09-3698 0188).

⁷⁵ Fax from Patricia Louis to Dawn Kelly Mobley (Oct. 11, 2007) (Exhibit 17 at 09-3698 0185).

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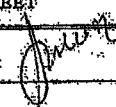
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 E-MAIL ADDRESS: NYCARIB@AOL.COM
 CARIBNEWS@ATT.NET

FACSIMILE TRANSMITTAL SHEET

TO: Dawn Kelly Mobley	FROM: P. Louis 
COMPANY: Ethics Counsel for Cong. Stephanie Tubbs Jones	DATE: 10/11/07
FAX NUMBER: 202-225-7392	TOTAL NO. OF PAGES INCLUDING COVER:
RE: Travel Form	

URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY YOUR INFORMATION

Further to our conversations of this morning, following is the Travel Certification Form.

~~The Conference is paid for by the Carib News Foundation. The companies are participants, are not sponsors or co-sponsors for any part of the trip and play no role in the planning or content.~~

The program has been amended to reflect the companies as Participants.

I regret the mis-understanding and thank you for holding my hand as I go through and grow through this process which is new to me.

Kindly review and advise before I send to Ms. Olsen.

I look forward to hearing from you.

80. The Board further notes that Ms. Louis represented that, "the program has been amended to reflect the companies as Participants," an action taken following Ms. Louis' interactions with Ms. Mobley. A copy of the revised agenda was submitted by another

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Member of Congress who attended the conference.⁷⁶ The Board notes that this “updated” schedule changed the label applied to “sponsors” to “participants” and in some cases deleted any mention of the corporate entity that had previously been identified as a “sponsor.”

Updated Schedule
for Carib Novels

18/24/2007 13:08 2129442889 PAGE 83

WORKING DRAFT 10/22

**12th Annual Caribbean Multi-National
Business Conference Program
Antigua & Barbuda**

81. This event was previously identified in the earlier draft as being “sponsored” by Preferred Health Partners.⁷⁷ Now it identifies them as merely a “participant.”⁷⁸

PORT & AIRPORT SECURITY - THE MANDATES

Moderator : Mr. Lance Ogiste
Hon. Bennie Thompson
Hon. Dwer Astephan

Venue Sandals Grande

Participant Preferred Health Partners

⁷⁶ Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 22, 2007) (Exhibit 21 at 09-3698 0244).

⁷⁷ Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 3, 2007) (Exhibit 19 at 09-3698 0228).

⁷⁸ Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 22, 2007) (Exhibit 21 at 09-3698 0248).

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82. In another example, the Board notes that the following event was previously identified as being sponsored by CITI.⁷⁹ Now CITI is not even mentioned.⁸⁰ The Board notes that the moderator was an executive at CITI at the time and represented the company at the conference.⁸¹

5:00pm - 6:30pm	COMMUNITY OUTREACH - <u>EDUCATION & YOUTH DIRECTION - ACCESS AND COLLABORATION</u>
Venue:	Multipurpose Cultural & Exhibition Center
Moderator:	Michael Flanigan
Speakers:	Dr. Edison Jackson - President Medgar Evers College Hon. David M. Dinkins - Former Mayor New York City Hon. Eddie Bernice Johnson - Member of Congress Hon. Bertrand Joseph

83. These changes were entirely cosmetic. There is no indication that the corporations' substantive role in the conference changed in any way.
84. That same day, October 11, 2007, Ms. Louis responded to Ms. Olson, stating that "[t]he sponsors contribute to the overall expense of the trip."⁸² The Board notes that this is precisely the answer she had pre-cleared with Mobley.

⁷⁹ Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 3, 2007) (Exhibit 19 at 09-3698 0234).

⁸⁰ Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 22, 2007) (Exhibit 21 at 09-3698 0254).

⁸¹ Memorandum of Interview of Representative of Citi (Mar. 17, 2009) (Exhibit 4).

⁸² E-mail from Patricia Louis to Susan Olson (Oct. 10, 2007, 10:33 AM EST) (Exhibit 17 at 09-3698 0182).

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From: plouis [mailto:plouis@nycaribnews.com]
 Sent: Thursday, October 11, 2007 10:33 AM
 To: Olson, Susan
 Subject: RE: Carib News - Pre-trip Approval Issues

Ms. Olson,
 In response to your e-mail:
 The sponsors contribute to the overall expense of the trip and the general work of
 the Foundation.
 As a courtesy, each contributor is given an opportunity to be attached to a part of
 the program
 that is being presented. They do not determine the content or the other participants
 in the
 Conference.

No federally registered lobbyist or foreign agent will be accompanying the Members
 or
 participating in the program.

Regards

 Patricia Louis
 Executive Assistant
 CARIB NEWS
 7 West 36th Street, 8th Floor
 New York, NY 10018

85. Ms. Olson then forwarded her exchange with Ms. Louis to Bill O'Reilly, the Staff Director and Chief Counsel of the Ethics Committee at that time, and to Dawn Mobley.⁸³ Based on this e-mail, it appears that Ms. Olson was unaware that Mobley had been communicating directly with the Carib News Foundation. There is also no evidence that Ms. Mobley told her she had been involved in this manner. Witnesses for the various sponsors told the OCE that they did contribute funding directly to the trip (the conference) and in no case did they simply make donations to the "general funds" of the CARIB NEWS or the Carib News Foundation.⁸⁴

⁸³ E-mail from Susan Olson to Bill O'Reilly and Dawn Kelly Mobley (Oct. 12, 2007 9:29 AM) (Exhibit 17 at 09-3698 0182).

⁸⁴ Memorandum of Interview of Representative of IBM (May 8, 2009) (Exhibit 9); Memorandum of Interview of Representative 1 of the Verizon Foundation (Mar. 23, 2009) (Exhibit 11); Memorandum of Interview of Representative of Citi (Mar. 17, 2009) (Exhibit 4); Memorandum of Interview of Representative 1 of Macy's (May 28, 2009) (Exhibit 20).

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From: Olson, Susan
 Sent: Friday, October 12, 2007 9:29 AM
 To: O'Reilly, Bill; Kelly Mobley, Dawn
 Subject: FW: Carib News - Pre-trip Approval Issues

Bill and Dawn,
 Please note the following response from Ms. Louis at Carib News: Unfortunately, it appears that if each sponsor contributes funding directly to the trip (an earmark of funds) and not simply to the general funds of Carib News, then the assumption is that all of these entities are co-sponsors of the trip for purposes of the House travel rules. If that is the case and since it is likely that at least one of these co-sponsors hires or retains a federally registered lobbyist, the trip could only be a one-day event trip. Thus, the Committee can't approve the trip as it currently exists.

But, if you have a different interpretation of the below information from Ms. Louis, please do let me know. Thanks! Susan.

86. Ms. Mobley then forwarded Ms. Olson's internal e-mail to Ms. Louis.⁸⁵ The Board notes that Ms. Mobley counseled that these "other organizations" can "participate" in the program but "should not help pay for the trip."

From: Kelly Mobley, Dawn
 Sent: Friday, October 12, 2007 9:59 AM
 To: 'Louis'
 Subject: FW: Confidential

Please read both emails below. Give Susan a call as soon as you work through the link, let her know you are following up. Please make yourself available to work through this matter today. Thank you Patricia. (These other organizations can participate in the program but should not help pay for the trip).

87. Later that day, Ms. Mobley sent Ms. Louis an additional e-mail.⁸⁶ As previously stated, the sponsors whom the OCE interviewed all stated that they did not "support [the] foundation annually" and did specifically designate their donations for the 2007 conference. Either Ms. Mobley was repeating inaccurate information Ms. Louis had given her, or she was giving inaccurate information to Ms. Olson without prompting.

⁸⁵ E-mail from Dawn Kelly Mobley to Patricia Louis (Oct. 12, 2007 9:59 AM EST) (Exhibit 17 at 09-3698 0181).

⁸⁶ E-mail from Dawn Kelly Mobley to Patricia Louis (Oct. 12, 2007 1:55 PM EST) (Exhibit 17 at 09-3698 0181).

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Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Friday, October 12, 2007 1:55 PM
To: plouis
Subject: RE: Confidential

The fax did not come through. I will be stepping out of the office for the remainder of the day, but will be in early Monday. Please follow up again with Susan. I have explained that the organizations you labeled as co-sponsors are not. They support your foundation annually, but have not and will not pay for the Members trip. This is simply a misunderstanding of the terms "sponsor", "contributor", and "participant" as used in the Ethics rules which is why I sent you the Rules book for preparation.

Once you are able to clarify these issues and make sure your itinerary passes too, you should be fine. An Ethics Committee Staff Attorney must review and approve as well. Your Staff Attorney is Susan.

88. Ms. Olson then sent Ms. Louis additional questions about the corporate entities previously identified as "sponsors."⁸⁷

From: Olson, Susan
Sent: Friday, October 12, 2007 2:41 PM
To: plouis
CC: Kelly Mobley, Dawn; O'Reilly, Bill
Subject: RE: Carla News - Pre-trip Approval Issues

Ms. Louis,

Please explain in more detail your email message below relative to the "sponsors contribute to the overall expense of the trip." In this regard, do the following entities pay for any of the expenses of the trip for the invited House Members, including roundtrip air transportation costs, lodging costs, meal costs, cost of a particular meal or reception, etc.?

- o Antigua Government
- o Sandals
- o Royal Caribbean Bakery
- o CITI
- o Pfizer
- o Macy's
- o AT&T
- o HSBC
- o IBM

⁸⁷ E-mail from Susan Olson to Patricia Louis (Oct. 12, 2007 2:41 PM EST) (Exhibit 17 at 09-3698 0176-0177).

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- o Goodworks International
- o Preferred Health Partners
- o Antigua & Barbuda
- o American Airlines
- o Golden Krust

Susan L. Olson

Counsel

House Committee on Standards of Official Conduct

89. Three days later, Ms. Louis sent an e-mail to Ms. Mobley, but addressed to Ms. Olson.⁸⁸ This may have been inadvertent or, based on their previous practice, Ms. Louis may have done this before she then sent it to Ms. Olson. This is the final communication regarding the 2007 conference provided to the OCE.

From: plouis [plouis@nycaribnews.com]
 Sent: Monday, October 15, 2007 11:00 AM
 To: 'Kelly Mobley, Dawn'
 Subject: RE: Carib News - Pre-110 Approval Issues

Ms. Olson,
 In response to your e-mail, the answer to your question is NO.
 Regards and Thanks for your patience.

Patricia Louis
 Executive Assistant
 CARIB NEWS
 7 West 36th Street, 8th Floor
 New York, NY 10018

90. In an interview with the OCE, a staff member of Representative Rangel's office, Staff Member 1 of Congressman Rangel's Office, described discussions with Ms. Louis and Ms. Mobley in 2007 on the topic of how the new travel rules would affect the Members' participation in the 2007 conference.⁸⁹ The staff member said that Ms. Louis, and Mr. and Mrs. Rodney told him that the then Chair of the Standards Committee had assigned

⁸⁸ E-mail from Patricia Louis to Dawn Kelly Mobley (Oct. 18, 2007 11:00 AM EST) (Exhibit 17 at 09-3698 0176).

⁸⁹ Memorandum of Interview of Staff Member 1 of Congressman Rangel's Office (May 27-28, 2009) (Exhibit 22 at 09-3698 0258).

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her counsel on the Committee, Ms. Mobley, to “find a way” to allow Members of Congress to participate in the conference under the new travel rules passed by the House in 2007.⁹⁰ The staff member told the OCE that Congressman Rangel told him that the then-Chair had made similar statements to him.⁹¹

91. Staff Member 1 of Congressman Rangel’s Office said the “framework” that was decided upon was that the Carib News Foundation would raise money from corporate donors who had previously sponsored the conference and that this money in turn would be deposited in a “common fund” that would then be used to pay for the conference. It was Staff Member 1 of Congressman Rangel’s Office’s understanding that if this was done, then Members of Congress could participate in the conference without any restrictions imposed by the new rules. Staff Member 1 of Congressman Rangel’s Office said that it was important to break the link between the corporations and the conference under the new rules and that using the Foundation in this way would enable that to happen. Staff Member 1 of Congressman Rangel’s Office said he learned of this new framework for the conference from Mr. and Mrs. Rodney and that they represented this approach had come from Ms. Mobley on the Standards Committee.⁹²
92. This conduct in 2007 is relevant to the present reviews for a number of reasons. First, in and of itself, the intervention of the Chair’s counsel in this matter is troubling and more likely constituted an improper manipulation of the clearance process. Following Ms. Mobley’s intervention, Carib News Foundation changed the Private Sponsor Travel Certification Form to delete any mention of private sponsors before it was sent to the Standards Committee’s staff attorney assigned to review the matter. This occurred after Carib News Foundation had told Ms. Mobley that these corporations were sponsors of the conference on several occasions. Ms. Louis’s initial, and presumably truthful, submissions regarding the conference described the corporate entities as sponsors. However, if the corporations were sponsors of the conference, as opposed to Carib News Foundation, then the Members of Congress ability to attend would have been limited because, the corporations, unlike the Carib News Foundation, employed or retained lobbyists. It appears from the correspondence between Ms. Mobley and Ms. Louis, and Ms. Olson’s apparent ignorance of the correspondence, that Ms. Mobley assisted Ms. Louis in preparing inaccurate answers for Ms. Olson in order to ensure that Ms. Olson would approve the trip in a manner that would not limit the attendance of the Members of Congress. Ms. Mobley’s involvement in the process seems to have prevented the

⁹⁰ *Id.* at 09-3698 0259

⁹¹ *Id.* at 09-3698 0259.

⁹² *Id.*

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Standards Committee and its staff from correctly performing its responsibilities. Ms. Olson's approval of the trip was predicated on an incomplete or inaccurate factual record, in which Ms. Mobley apparently was complicit, putting at risk those Members of Congress who relied on that approval.


93. The 2007 conduct and attendant misrepresentations appear to have directly influenced what occurred in 2008. When the Carib News Foundation submitted materials to the Standards Committee for their approval of the 2008 conference, the Carib News Foundation took the same approach that they had been counseled to take in 2007 and did not disclose the role of the corporate sponsors on the Private Sponsor Travel Certification Form or the conference agenda.

94. In fact, in 2008, Carib News Foundation again first submitted its document to Ms. Mobley.⁹³ The Board notes that while Ms. Mobley remains an employee of the U.S. House of Representatives as of the date of this report, the above described conduct did not occur after the day the House passed the resolution creating the OCE, and therefore, under the terms of the that resolution, the OCE does not have jurisdiction to open a preliminary review into Ms. Mobley's conduct.

⁹³ Fax from Patricia Louis to Dawn Kelly Mobley (Aug. 20, 2008) (Exhibit 23 at 09-3698 0264).

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 THE NEW YORK CARIBNEWS <small>THE WEEKLY VOICE OF THE CARIBBEAN-AMERICAN COMMUNITY 7 WEST 28TH STREET, 22 FLOOR, NEW YORK, NY 10018</small>	
TEL: (212) 944-1991; FAX: (212) 944-2089 E-MAIL ADDRESS: NYCARIB@AOL.COM ; CARIBNEWS@ATT.NET	
FACSIMILE TRANSMITTAL SHEET	
TO: Kelly Mobley	FROM: Patricia Louis
COMPANY: Committee on Standards of official conduct	DATE: 8/20/08
FAX NUMBER: 202-225-7392	TOTAL NO. OF PAGES INCLUDING COVER:
RE: 2008 MULTINATIONAL BUSINESS CONFERENCE	
<input type="checkbox"/> URGENT <input type="checkbox"/> FOR REVIEW <input type="checkbox"/> PLEASE COMMENT <input type="checkbox"/> PLEASE REPLY <input type="checkbox"/> YOUR INFORMATION	
Following is the completed form and attachments re travel for Members of Congress to attend the 2008 Multinational Business Conference scheduled for November 6-9, 2008 in St. Maarten.	
Regards	

IV. The Value of the Trip Reported on the Member's Post-Travel Disclosure Form

95. Under House Rule 25 clause 5(d), Members are required to obtain prior approval of the Standards Committee for trips where the Member's travel expenses will be reimbursed by a private source. The Standards Committee has adopted regulations, including a pre- and post-travel form Members must complete, pursuant to House Rule 25 clause 5(h)(1)(B)⁹⁴ that requires Members to publicly disclose "trip expenses."
96. According to the House Ethics Manual, "[t]he rule and implementing regulations are concerned with the organization(s) or individual(s) that actually pay for travel." House Ethics Manual (2008) at 97.

⁹⁴ House Rule 25(5)(h)(1)(B) directs the Standards Committee to establish, "regulations describing the information it will require individuals subject to this clause to submit to the committee in order to obtain the prior approval of the committee for any travel covered by this clause . . ." On February 20, 2007, the Committee issued guidelines and regulations concerning the travel restrictions and requirements.

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97. There is substantial reason to believe that Delegate Christensen violated House Rule 25 clause 5(h)(i)(1)(B) by underreporting the value of the travel reimbursements she received to attend the 13th Annual Caribbean Multi-National Business Conference.

A. Representations from Carib News Foundation

98. Carib News Foundation submitted a Private Sponsor Travel Certification Form to each Member it sponsored for the 2008 trip—Representatives Christensen, Kilpatrick, Payne, Rangel and Thompson.⁹⁵ This form was provided to each Member Office and then submitted by the Member Office to the Standards Committee as part of the pre-travel approval process.

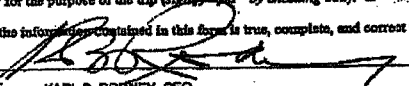
21. **TOTAL EXPENSES FOR EACH PARTICIPANT**

<input type="checkbox"/> Actual amounts <input type="checkbox"/> Good faith estimates	Total Transportation Expenses per Participant	Total Lodging Expenses per Participant	Total Meal Expenses per Participant
For each Member, Officer, or employee	410	290	145
For each accompanying family member	410	0	145

	Other Expenses (dollar amount)	Identify Specific Nature of "Other" Expenses (e.g., taxi, parking, registration fee, etc.)
For each Member, Officer, or employee		
For each accompanying family member		

22. I represent that reimbursement for miscellaneous travel expenses for the trip, such as travel to and from airports, security costs, interpreter fees, visa application fees, and similar expenses, will be for actual costs incurred and are necessary for the purpose of the trip (signify "yes" by checking box):

23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: 

Name and title: KARL B. RODNEY, CEO

Organization: CARIB NEWS FOUNDATION

Address: 7 WEST 56th STREET, 6th FLOOR, NEW YORK, NY 10018

Telephone number: (212) 944-1991

Fax number: (212) 944-2068

Email Address: CARIB-DESK@ATT.NET

The Committee staff may contact the above individual above if additional information is required.


⁹⁵ Private Sponsor Travel Certification Form signed by Karl Rodney (Oct. 3, 2008) (Exhibit 1 at 09-3698 0007).

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended⁹⁶

99. The Board notes that the Carib News Foundation provided the same exact dollar figure with very minor variations for each Member of Congress that attended the conference despite the fact that Carib News Foundation recognized on the same form that the Congressional travelers were travelling to and from different cities. In fact, the Congressional travelers came from St. Croix, U.S. Virgin Islands; Detroit, Michigan; Newark, New Jersey; New York, New York; and Jackson, Mississippi.

100. After the conference, the Carib News Foundation provided a memorandum to Representatives Rangel, Thompson, Payne and Kilpatrick and Delegate Christensen that represented to contain the value of the trip-related reimbursements.⁹⁶

	CARIB NEWS FOUNDATION 7 WEST 36TH STREET, 8TH FLOOR, NEW YORK, NY 10018 TEL: (212) 944-1991; FAX: (212) 944-2089 E-MAIL: INFO@CARIBNEWSCONFERENCE.COM															
	<hr/> TO : Congresswoman Donna Christensen FROM : Karl B. Rodney DATE : November 18, 2008 <hr/> SUBJECT : Business Conference Travel Information <hr/> <p>The following is the breakdown of the value for the 13th Annual Caribbean Multi-National Business Conference held in St. Maarten, N.A. from November 6 - 9, 2008.</p> <table> <tr> <td>Airfare</td> <td>-</td> <td>\$410.00</td> <td></td> </tr> <tr> <td>Hotel</td> <td>-</td> <td>\$270.00</td> <td>(Nov. 6 & 7)</td> </tr> <tr> <td>Registration/</td> <td>-</td> <td>\$175.00</td> <td></td> </tr> <tr> <td>Transportation</td> <td></td> <td></td> <td></td> </tr> </table> <p>Total amount of package = \$ 855.00</p>	Airfare	-	\$410.00		Hotel	-	\$270.00	(Nov. 6 & 7)	Registration/	-	\$175.00		Transportation		
Airfare	-	\$410.00														
Hotel	-	\$270.00	(Nov. 6 & 7)													
Registration/	-	\$175.00														
Transportation																

⁹⁶ Memorandum from Carib News Foundation to Delegate Christensen (Nov. 18, 2008) (Exhibit 1 at 09-3698 0012).

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

101. The Board notes that the Carib News Foundation provided the same "total transportation" figure to the Congressional travelers despite the fact that Carib News Foundation had, in its own files, airline tickets and receipts for each Congressional traveler that showed, with the exception of Congressman Payne, that the actual cost of the ticket was significantly higher.

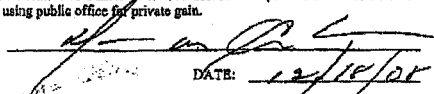
102. In addition, according to Mr. Rodney, the cost charged to "the public" to attend the conference for four days and three nights was \$840 for double occupancy or \$1085 for single occupancy. The cost of attendance included "room accommodations, meals, and admission to the Conference." However, these figures were not disclosed pre-travel to the Members or the Standards Committee, nor were these figures disclosed to the Members after the conference.

B. Information Required from the Congressional Traveler

103. On her Member/Officer Post-Travel Disclosure Form,⁹⁷ Delegate Christensen certified her travel cost as the following:

9. TRIP EXPENSES: Obtain actual dollar amounts from the sponsor. If exact dollar amounts are unavailable by the due date, provide a good faith estimate and file an amended form once the correct amounts are received.			
	Total Transportation Expenses	Total Lodging Expenses	Total Meal Expenses
For Member or Officer:	\$410.00	\$270.00	Included in lodging
For accompanying family member:			
	Other Expenses (dollar amount)	Specific Nature of Expenses (e.g., taxi, parking, registration fee, etc.)	
For Member or Officer:	\$175.00	Ground transportation & registration fee	
For accompanying family member:			

I certify that the information contained in this form is true, complete, and correct to the best of my knowledge. I have determined that all of the expenses listed above were necessary and that the travel was in connection with my duties as a Member or Officer of the U.S. House of Representatives and would not create the appearance that I am using public office for private gain.

SIGNATURE OF MEMBER: 

DATE: 12/18/08

⁹⁷ Member/Officer Post-Travel Disclosure Form signed by Delegate Donna M. Christensen (Dec. 22, 2008) (Exhibit 1 at 09-3698 0003).

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

104. Delegate Christensen acknowledged her signature on her post-travel disclosure form.⁹⁸

By signing the document, Delegate Christensen certified that her transportation expenses were \$410. This is the figure in the memorandum from Karl Rodney cited above.⁹⁹

105. However, according to records produced by Mr. Rodney, Delegate Christensen's total transportation expenses were \$578. Delegate Christensen received two one way tickets in the amount of \$381 and \$197, respectively.¹⁰⁰

FOR: CHRISTENSEN/DONNA HON

06 NOV 08 - THURSDAY
 AIR AMERICAN AIRLINES FLT:5073 ECONOMY
 OPERATED BY AMERICAN EAGLE/EXECUTIVE
 LV ST CROIX 1100A EQP: AER72 TURBOPROP
 42MIN
 NON-STOP

AR SAN JUAN PR 1142A
 ARRIVE: TERMINAL D
 CHRISTENSEN/DONNA HON SHAT-1B AA-Y3R5588
 AMERICAN AIRLINES FLT:5032 ECONOMY FOOD FOR PURCHASE
 OPERATED BY AMERICAN EAGLE/EXECUTIVE
 LV SAN JUAN PR 1235P EQP: AER72 TURBOPROP
 DEPART: TERMINAL D 142P 01HR 07MIN
 AR ST CROIX CHRISTENSEN/DONNA HON SHAT-2C AA-Y3R5588 NON-STOP

*****CARIB NEWS*****
 10/27- AIRFARE 381.50 ONE WAY COACH. THE 5 PERCENT
 DISCOUNT FROM OUR CONTRACT HAS BEEN APPLIED.
 THANKS,
 DONNA
 ELECTRONIC TICKET
 10/27 - ATTN FAT - CONGRESSWOMAN'S HUSBAND NOT ATTENDING.

STAPLE HERE ATB2

PASSENGER TICKET AND BAGGAGE CHECK
 ELECTRONIC TICKET
 American Airlines
 PASSENGER RECEIPT 10/27/08
 CHRISTENSEN/DONNA HON
 MUST VALID FOR TRAVEL
 SAN JUAN PR
 NEW VALID FOR TRAVEL
 001 2190158857 2

STAPLE HERE ATB2
 INSERT

00112184722126 001 2190158857 2

⁹⁸ Memorandum of Interview of Delegate Donna Christensen (May 4, 2009) (Exhibit 2 at 09-3698 0032).

⁹⁹ Memorandum from Carib News Foundation to Representatives Rangel, Thompson, Payne and Kilpatrick and Delegate Christensen (Nov. 18, 2008) (Exhibit 1 at 09-3698 0012).

¹⁰⁰ Flight Reservation for Delegate Donna Christensen (Oct. 27, 2008) (Exhibit 24 at 09-3698 0288).

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended²

7 west 36th street new york, 10018				
Confirmation Number: TC2TDF		Agent Number: 5535		
Booking Date: 27Oct08		Booked By: Afeesha		
ITINERARY: MRS. D CHRISTENSEN				
Date	Flt	Depart	Arrive	Stops
Sat 08Nov08	550	SXM - ST.MARTEN 12:10pm	SXT - ST.THOMAS 12:55PM	0
Fare and Charges Detail: Total For 01 guest(s)				
		Fare:		112.00
		Passenger Facility Charge:		7.00
		Airport Development Tax:		5.00
		Airport Authority Taxes:		9.35
		Airport Passenger Taxes:		30.00
		Fuel & Insurance Surcharge:		34.50
		Total:		\$197.85
Payment (s):		Master Card:		\$197.85
		Balance Due:		\$0.00
NOTE - Terms & Conditions				

106. In her interview with the OCE, Delegate Christensen stated that she saw her airline ticket. Although she did not recall seeing a hotel bill, she remembered checking into the hotel. She also stated that she probably received a bill when she checked out because she was responsible for any incidental expenses.¹⁰¹ Delegate Christensen's scheduler filled out the post-travel forms. Delegate Christensen did not know where her scheduler got the information that appeared on the form but assumed she knew how much the hotel cost.¹⁰²

V. Carib News Foundation, as a Private Foundation, Was Prohibited From Paying for Delegate Christensen's Travel

107. The Carib News Foundation is identified as the "sponsor" of this conference on at least three forms filed with the Committee on Standards of Official Conduct: (1) the "Private Sponsor Travel Certification Form,"; (2) the "Privately Sponsored Travel: Travel Form," and; (3) the "Member/Officer Post-Travel Disclosure Form."¹⁰³

108. According to a query of the New York State's Office of the Secretary of State, Mr. Rodney appears to operate two organizations – the "Carib News, Inc" which operates a newspaper and the "Carib News Charities, Inc" which also may operate under the name "Carib News Foundation." The OCE has not been able to identify any additional activity, other than the annual Caribbean Multi-National Business Conference, in which the latter organization is involved. Furthermore, while "Carib News Charities, Inc" / "Carib News

¹⁰¹ Memorandum of Interview of Delegate Donna Christensen (May 4, 2009) (Exhibit 2 at 09-3698 0031).

¹⁰² *Id.* at 09-3698 0032

¹⁰³ Member/Officer Post-Travel Disclosure Form signed by Delegate Donna M. Christensen (Dec. 22, 2008) (Exhibit 1).

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended.

Foundation” is listed with New York’s Office of the Secretary of State as a domestic not-for-profit corporation, it is not listed, as required by law, with the New York State Charities Bureau. In addition, there is no evidence that the organization has filed a tax return with the IRS, under either name, since 2005.¹⁰⁴ According to Publication 78 of the IRS, a list of all charities claiming 501(c) status, Carib Charities, Inc is a private foundation.¹⁰⁵

109. Every organization that qualifies for tax exemption described in section 501(c)(3) of the Internal Revenue Code is defined as a private foundation unless the organization falls into one of the categories specifically excluded from the definition under section 509(a).¹⁰⁶ In effect, the definition divides 501(c)(3) organizations into two classes: private foundations and public charities. Private foundations are generally funded through a single donor, family or corporation and operate through investment income; whereas, public charities are typically funded and operated through diversified support from governmental sources and the general public.
110. There are several restrictions that are placed on private foundations. At issue here is the restriction on “self-dealing” between a disqualified person (the definition of which includes Members of Congress) and a private foundation.¹⁰⁷ The Code defines the act of “self-dealing” to include any direct or indirect agreement to make any payment of money (including reimbursement of expenses) or other property by a private foundation to a government official.¹⁰⁸ Although framed as a tax provision, the statute essentially bars certain federal employees and federally elected officials from receiving compensation, including reimbursements for international travel, from a private foundation.¹⁰⁹
111. As such, it appears that the Carib News Foundation’s payment of travel expenses for Representative Kilpatrick and her acceptance of payment potentially violated the Internal Revenue Code.

¹⁰⁴ Letter from IRS to OCE (Apr. 17, 2009) (Exhibit 8).

¹⁰⁵ Online Version of Publication 78 (Accessed online on June 5, 2009 at <http://www.irs.gov/app/pub-78/>) (Exhibit 8 at 09-3698 0119.1-0119.2).

¹⁰⁶ 26 U.S.C. §§ 501 and 509.

¹⁰⁷ 26 U.S.C. §§ 4941 and 4946.

¹⁰⁸ 26 U.S.C. § 4941(d)(1)(F). The Code imposes a tax (currently 10 percent of the amount involved) on the illegal payments, with later penalties (up to \$20,000 per act of self-dealing) for failure to pay back the foundation. The tax is imposed on the disqualified person, including a government official if the official participates in the act of self-dealing knowingly.

¹⁰⁹ The payment or reimbursement of travel expenses for travel solely from one point in the United States to another point in the United States is excepted from the definition of self-dealing provided that the payment or reimbursement does not exceed the actual cost of the transportation involved and provided the amount for all other traveling expenses does not exceed 125 percent of the maximum amount payable under section 5702 of title 5, United States Code, for like travel by employees of the United States. 26 U.S.C. § 4941(d)(2)(G)(vii).

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

112. The Board infers from the fact that the Standards Committee approved the reimbursement that the Standards Committee is unaware of this restriction. The Board notes, however, that its own research revealed that numerous other ethics-related entities in the federal government are aware of this restriction, and have for some time been enforcing it.¹¹⁰
113. The Board notes that these facts show failures at multiple points by multiple parties in complying with and enforcing the travel rules. Inaccurate information was provided by the Carib News Foundation to Members and the Standards Committee. Delegate Christensen certified inaccurate information to the Standards Committee and failed to disclose the number of family members accompanying her. The counsel to the former Chair of the Standards Committee intervened in the review process in a way that both frustrated the process in 2007 and set a pattern of obfuscation that continued in 2008. Finally, the Standards Committee appears unaware of limitations on the ability of private foundations to pay for overseas travel by Members.
114. For all these reasons, the Board concludes further review of this matter by the Standards Committee is appropriate.

¹¹⁰ Memorandum from Ethics Counsel at the National Institutes of Health to Deputy Ethics Counsels at NIH (Jun. 2, 2000) (Exhibit 25 at 09-3698 0291).

EXHIBIT 1

Original Amendment

U.S. House of Representatives
110th Congress

MEMBER / OFFICER
POST-TRAVEL DISCLOSURE FORM

This form is for disclosing the receipt of travel expenses from a private source for meetings, speaking engagements, fact-finding trips or similar events in connection with official duties. You need not disclose government-funded or political travel on this form, or travel that is unrelated to official duties. This form does not eliminate the need to report all privately-funded travel on the Member or officer's annual Financial Disclosure Statement. In accordance with clause 4 of House Rule 25, complete this form and file it with the Clerk of the House of Representatives, 5-106 Cannon House Office Building, within 15 days after travel is completed. The Clerk is to make these forms available to the public as soon as possible after they are received.

1. Name of Traveler: Donna M. Christensen
2. a. Name of Accompanying Family Member (if any): None
 b. Relationship to Member/Officer: Spouse Child Other (specify): _____
3. a. Date of Departure and Date of Return: 11/6 to 11/8
 b. Dates of personal expenses (if any): None
4. Itinerary (cities of departure—destination—return): St. Croix - St. Martin - St. Thomas
5. Sponsor(s) (who paid for the trip): Carib News Foundation
6. Describe meetings and events attended (attach additional pages if necessary): See attached
7. Attached to this form are EACH of the following (signify that each item is attached by checking the corresponding box):
 - a. the Private Sponsor Travel Certification Form completed by trip sponsor, including all attachments; ---
 - b. the Traveler Form completed by the Member or officer; and
 - c. the Committee on Standards' letter approving my participation on this trip.
8. a. I represent that I participated in each of the activities reflected in the sponsor's agenda. (Signify that statement is true by checking box):
 b. If not, explain: _____

CHRISTENSEN.

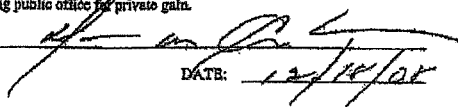
9. TRIP EXPENSES: Obtain actual dollar amounts from the sponsor. If exact dollar amounts are unavailable by the due date, provide a good faith estimate and file an amended form once the correct amounts are received.

	Total Transportation Expenses	Total Lodging Expenses	Total Meal Expenses
For Member or Officer:	\$410.00	\$270.00	Included in lodging
For accompanying family member:			

	Other Expenses (dollar amount)	Specific Nature of Expenses (e.g., taxi, parking, registration fee, etc.)
For Member or Officer:	\$175.00	Ground transportation & registration fee
For accompanying family member:		

I certify that the information contained in this form is true, complete, and correct to the best of my knowledge. I have determined that all of the expenses listed above were necessary and that the travel was in connection with my duties as a Member or Officer of the U.S. House of Representatives and would not create the appearance that I am using public office for private gain.

SIGNATURE OF MEMBER:



DATE:

12/18/08

Version date 02/08 by Committee on Standards of Official Conduct

U.S. House of RepresentativesCOMMITTEE ON STANDARDS OF
OFFICIAL CONDUCT

Washington, DC 20515

October 16, 2008

The Honorable Donna Christensen
U.S. House of Representatives
1510 Longworth House Office Building
Washington, DC 20515

Dear Colleague:

Pursuant to House Rule 25, clause 5(d)(2), the Committee on Standards of Official Conduct hereby approves your proposed trip for you and your spouse to St. Maarten, N.A. scheduled for November 6 to 8, 2008 sponsored by the Carib News Foundation.

You must complete a Member Travel Disclosure Form and file it with the Clerk of the House within 15 days after your return from travel. As part of that filing, you are required to attach a copy of this letter and the Private Sponsor Travel Certification Form, including attachments. You must also report all travel expenses totaling more than \$335 from a single source on Schedule VII of your annual Financial Disclosure Statement.

Because the trip may involve meetings with foreign government representatives, we note that House Members may accept, under the Foreign Gifts and Decorations Act, gifts "of minimal value [currently \$335] tendered as a souvenir or mark of courtesy" by a foreign government. Any tangible gifts valued in excess of \$335 received by you or your spouse from a foreign government must, within 60 days of acceptance, be disclosed on a Form for Disclosing Gifts from Foreign Governments and either turned over to the Clerk of the House, or, with the written approval of the Committee, retained for official use.

However, we would note that since this trip is scheduled to commence after the general election on November 4, 2008 and because officially-connected travel must be related to official duties, it may be questionable whether a Member who was not reelected in the general election should to accept an invitation for a trip that is fact-finding in nature. Arguably, as of that time, the official responsibilities that may justify the acceptance of travel expenses for such a purpose will have come to an end. This consideration generally will not limit the Committee's authority to approve travel of a departing Member to participate substantially in an officially-related event (for example, to give a speech). Please keep this guidance in mind, as you may need to reevaluate your ability to participate in the trip following the election.

09-3698 0004

U.S. House of Representatives
Committee on Standards of Official Conduct

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM
(provide directly to each House invitee)

This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers or employees under House Rule XXV, clause 5. A completed copy of the form (and any attachments) should be provided to each invited House Member, officer or employee, who will then forward it to the Committee. The trip sponsor should NOT submit the form directly to the Committee.

Private sponsors are urged to submit this form to each House invitee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the invitee not receiving approval for the trip. The submission of an incomplete form will delay the review process. Before completing this form, sponsors are urged to carefully review the Committee's private travel guidelines and advisory memoranda detailing the rules and restrictions for private travel, as well as the instructions for completing this form. Sponsors should call the Committee with any questions prior to submitting the form. Please type form.

1. Sponsor(s) (who will be paying for the trip): CARIB NEWS FOUNDATION
2. I represent that the trip will not be financed (in whole or in part) by a federally-registered lobbyist or a registered foreign agent (signify "yes" by checking box):
3. I represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip (signify "yes" by checking box):
4. Is travel being offered to an accompanying family member of the House invitee(s)? Yes No
5. Provide names and titles of ALL House invitees; for each invitee, provide explanation of why the individual was invited (include additional pages if necessary): BASED ON COMMITTEE OR SUB-COMMITTEE WHICH IMPACTS US/CARIBBEAN RELATIONS ON WHICH THE MEMBER SERVES.
6. Dates of travel: NOVEMBER 8-9, 2008
7. Cities of departure -- destination -- return: VARIES - DEPENDING ON MEMBER
8. Attached is a detailed agenda of the activities taking place during the travel (i.e., an hourly description of planned activities) (signify "yes" by checking box):
9. I represent that (check one of the following):
 - a. The sponsor of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965: or
 - b. The sponsor of the trip does not retain or employ a federally registered lobbyist or registered foreign agent: or
 - c. The trip is for attendance at a one-day event and lobbyist involvement in planning, organizing, requesting, or arranging the trip was de minimis under the Committee's travel regulations.
10. If travel is for participation in a one-day event (i.e., if you checked Question 9(c)), check one of the following:
 - a. One-night's lodging and meals are being offered: or
 - b. Two-nights' lodging and meals are being offered:
 If "b" is checked, explain why the second night is warranted: _____

11. If the trip is not sponsored by an institution of higher education, I represent that a federally-registered lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip (signify "yes" by checking box):

12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip: CARIB NEWS FOUNDATION ("SEE ATTACHED")

13. Describe each sponsor's organizational interest in the purpose of the trip: THE INTEREST OF CARIB NEWS FOUNDATION IS TO PROMOTE, INFORM, TRADE AND ESTABLISHMENT OF MEANINGFUL CONNECTIONS BETWEEN THE U.S AND THE CARIBBEAN

14. Describe the type and class of the transportation being provided. Indicate whether coach, business-class or first-class transportation will be provided. In addition, for travel via aircraft, please indicate if travel is being offered on a commercial flight, chartered flight or on an aircraft operated or paid for by a carrier not licensed by the Federal Aviation Administration to operate for compensation or hire (i.e., a private aircraft). If first-class fare is being provided, or if travel is via chartered or private aircraft, please provide an explanation describing why such travel is warranted. REGULAR SCHEDULED AIR SERVICE, ECONOMY CLASS

15. I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s). (signify "yes" by checking box):

16. I represent that either (check one of the following):
a. The trip involves an event that is arranged or organized without regard to congressional participation and that meals provided to congressional participants are similar to those provided to or purchased by other event attendees: or
b. The trip involves events that are arranged or organized specifically with regard to congressional participation:
If "b" is checked, detail the cost per day of meals (approximate cost may be provided): _____

17. Reason for selecting the location of the event or trip: SEE ATTACHED

18. Name of hotel or other lodging facility: SONESTA MAHO BEACH RESORT

19. Cost per night of hotel or other lodging facility (approximate cost may be provided): \$110.00

20. Reason(s) for selecting hotel or other lodging facility: HAS APPROPRIATE MEETING ROOMS

21. TOTAL EXPENSES FOR EACH PARTICIPANT

<input type="checkbox"/> Actual amounts <input type="checkbox"/> Good faith estimates	Total Transportation Expenses per Participant	Total Lodging Expenses per Participant	Total Meal Expenses per Participant
For each Member, Officer, or employee	410	290	145
For each accompanying family member	410	0	145

	Other Expenses (dollar amount)	Identify Specific Name of "Other" Expenses (e.g. taxi, parking, registration fee, etc.)
For each Member, Officer, or employee		
For each accompanying family member		

22. I represent that reimbursement for miscellaneous travel expenses for the trip, such as travel to and from airports, security costs, interpreter fees, visa application fees, and similar expenses, will be for actual costs incurred and are necessary for the purpose of the trip (signify "yes" by checking box):

23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: 

Name and title: KARL E. ROCNEY, CEO

Organization: CARIB NEWS FOUNDATION

Address: 7 WEST 38th STREET, 8th FLOOR, NEW YORK, NY 10018

Telephone number: (212) 944-1981

Fax number: (212) 944-2088

Email Address: CARIB-DESK@ATT.NET

The Committee staff may contact the above individual above if additional information is required.

If there are any questions regarding this form please contact the Committee at the following address:

Committee on Standards of Official Conduct
 U.S. House of Representatives
 HI-2, The Capitol
 Washington, DC 20515
 (202) 225-7103 (phone)
 (202) 225-7392 (general fax)
 (202) 225-7172 (fax for travel approvals)

Version date 4/2007 by Committee on Standards of Official Conduct

U.S. House of Representatives
Committee on Standards of Official Conduct

PRIVATELY SPONSORED TRAVEL: TRAVELER FORM
For Members, Officers and Employees
(submit directly to the Committee)

This form should be completed by House Members, officers or employees seeking Committee approval of privately-sponsored travel or reimbursement for travel under House Rule XXV, clause 5. The completed form should be submitted directly to the Committee by each invited House Member, officer or employee, together with the completed and signed Private Sponsor Travel Certification Form.

Members, officers and employees seeking approval for travel are urged to submit all forms to the Committee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the invitee not receiving approval for the trip. A copy of this form will be made available for public inspection. Please type form. Form (and any attachments) may be faxed to the Committee at (202) 225-7392.

1. Name of Member, officer or employee (traveler): DONNA M. CHRISTENSEN
 2. Sponsor(s) (who will be paying for the trip): CARIB NEWS FOUNDATION

 3. Travel destination(s): SAINT MARTEN, NETHERLAND ANTILLES
 4. a. Dates of travel: NOV 6, 2008 to NOVEMBER 8, 2008
 - b. Will you be extending the trip at your personal expense? Yes No

If yes, dates at personal expense: _____
 5. a. Name of accompanying family member (if any): _____
 - b. Relationship to Member/Officer: Spouse Child Other (specify): _____
 6. a. Did the trip sponsor answer "yes" to Question 9(c) on the Trip Sponsor form (i.e., the travel is being sponsored by an entity that employs a lobbyist)? Yes No
 - b. If yes, check one of the following:
 - (1) Approval for one-night's lodging and meals is being requested: or
 - (2) Approval for two-nights' lodging and meals is being requested:

If "(2)" is checked, explain why the second night is warranted: _____
-
7. Private Sponsor Travel Certification Form is attached, including agenda, invitee list, and any other attachments (indicate that form is attached by checking box):

8. Explain why participation in the trip is connected to your official or representational duties: THE MEMBER'S CONSTITUENCY CONSISTS OF PERSONS FROM THE GREATER CARIBBEAN WHO NOW RESIDES IN THE VIRGIN ISLANDS AND HAVE AN INTEREST IN KEEPING CONNECTED THROUGH BUSINESS + EDUCATIONAL OPPORTUNITIES

9. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: Shelley M. Thomas

Name of Signatory (if other than traveler): Shelley M. Thomas

For staff, name of employing Member/Committee: _____

Office address: 1510 LHOB

Phone number: 202-225-1790

Email address: Shelley.Thomas@mail.house.gov

NOTE: You must complete the contact information fields above, as Committee staff may need contact you if additional information is required.

**FOR STAFF:
TO BE COMPLETED BY YOUR EMPLOYING MEMBER:**

I hereby authorize the individual named above, an employee of the U.S. House of Representatives who works under my direct supervision, to accept expenses for the trip described in this request. I have determined that the above-described travel is in connection with my employee's official duties and that acceptance of these expenses will not create the appearance that the employee is using public office for private gain.

Signature of Employing Member

Date: _____

If there are any questions regarding this form please contact the Committee:

Committee on Standards of Official Conduct
U.S. House of Representatives
HT-2, The Capitol
Washington, DC 20515
(202) 225-7103 (phone)
(202) 225-7392 (fax)

Version date 9/2007 by Committee on Standards of Official Conduct



Government of Sint Maarten

Sarah Wescot-Williams, M.Sc.

Telephone:
(599) 543-1166

Fax:
(599) 542-4292

E-mail:
comged@sintmaarten.net

St. Maarten, August 28, 2008

Congresswoman Donna M. Christensen
U.S House of Representatives
1510 Longworth HOB
Washington, DC 20515
Phone: 202-225-1790
Fax: 202-225-5517

Honorable Congresswoman Christensen,

The well-known Carib News Foundation has once more chosen our island, St. Maarten, as venue for its 13th Annual Caribbean Multi-National Business Conference scheduled to be held from November 6 - 9, 2008 at the Sonesta Maho Beach Resort & Casino. The conference is being held under the theme: "A Region in Transition - Strategy for Change, Alliance for Progress".

We are thrilled to host this very important and prestigious conference and it is my distinct pleasure, on behalf of the government and people of St. Maarten, to invite you personally to be part of this gathering which we hope would, as its theme suggests, map out a strategy for change and a reinvigorated alliance for progress during this period of obvious transition in U.S.-Caribbean relations.

St. Maarten, widely known as The Friendly Island, is not a typical sun-sea-and-sand destination in the Caribbean, but perhaps the most unique and cosmopolitan island in the region, given its size and its rich cultural diversity.

Considered the "culinary capital of the Caribbean," St. Maarten was ranked third in the world and first in the Caribbean in this year's inaugural TripAdvisor Travelers' Choice Destinations Awards. It is an honor that we cherish very much since the choice was made among millions of "real travelers" who know the vacation destinations the best.

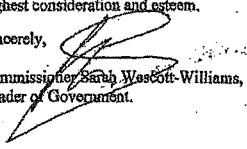
The Caribbean Multi-National Business Conference offers you a fine opportunity to combine business with pleasure on our island with a wide variety of activities, a pulsating nightlife, absolutely duty-free shopping, and 37 beautiful beaches to choose from.

Similarly, our vibrant investment climate offers numerous opportunities for investors in an atmosphere of peace and stability.

I am personally looking forward to welcoming you to our island, and assure you that we will do everything within our power to make your stay a very memorable and pleasant experience.

May I avail myself of this opportunity to renew to you the assurances of my highest consideration and esteem.

Sincerely,


Commissioner Sarah Wescot-Williams,
Leader of Government.



CARIB NEWS FOUNDATION
7 WEST 36TH STREET, 8TH FLOOR, NEW YORK, NY 10018
TEL: (212) 944-1991; FAX: (212) 944-2089
E-MAIL: INFO@CARIBNEWSCONFERENCE.COM

June 25, 2008

Congresswoman Donna M. Christensen
U.S House of Representatives
1510 Longworth HOB
Washington, DC 20515

Dear Congresswoman Christensen:

Thanks so much for your leadership and support for the Annual Caribbean Multi-National Business Conference. Once again, we welcome your role in encouraging your colleagues to attend and to assist in framing the conference Theme and Focus.

As you know, the Conference was created to provide a forum for businesses, organizations and individuals from the United States to dialogue and learn more of the unique relationship and regional issues of common interest with the Caribbean Region.

This year the Conference will be held in St. Maarten, N.A. from November 6 - 9, 2008. In cooperation with the Government of St. Maarten, our goal is to have all interested parties joining forces to foster an atmosphere of democracy, stability and opportunity for our fellow citizens of the world. It will also allow businesses in the United States to introduce their products to a new market, thus adding to the economy of both countries.

We respectfully request your presence, your participation and continued leadership. We will work with your staff to work out the details and as usual, we will ask your staff to co-ordinate with your Colleagues.

Thanks so much for all you do in support of the region and the conference.

Thanks for your kind consideration.

Very Truly Yours

Faye A. Rodney
President

Karl B. Rodney
Publisher/CEO

cc. Commissioner Sarah Wescot-Williams

Organized by Carib News Foundation. A non-profit project 501-C3 corporation.



CARIB NEWS FOUNDATION
7 WEST 36TH STREET, 8TH FLOOR, NEW YORK, NY 10018
TEL: (212) 944-1991; FAX: (212) 944-2089
E-MAIL: INFO@CARIBNEWSCONFERENCE.COM

TO : Congresswoman Donna Christensen
FROM : Karl B. Rodney
DATE : November 18, 2008

SUBJECT : Business Conference Travel Information

The following is the breakdown of the value for the 13th Annual Caribbean Multi-National Business Conference held in St. Maarten, N.A. from November 6 - 9, 2008.

Airfare	-	\$410.00	
Hotel	-	\$270.00	(Nov. 6 & 7)
Registration/	-	\$175.00	
Transportation			

Total amount of package = \$ 855.00

Organized by Carib News Foundation, A non-profit project 501-C-3 corporation

08/10/2008 04:18 FAX

CARIB NEWS

08/03/2008



Carib News Foundation
7 West 36th Street, 8th Floor, New York, NY 10018
Tel: (212) 444-1999; Fax: (212) 444-2089
Email: info@caribnewsfoundation.com

Item #12

CARIB NEWS FOUNDATION is organized to provide education and information about the Caribbean in the area of Business, Education, Health and Culture, Promote Good neighborly within the United States and the hemisphere.

The participants are selected to participate in the various workshops during the Conference based on their demonstrated interest, expertise and assignment in the United States Congress.

Item #17

A Caribbean country whose proximity to other Caribbean Countries makes it conveniently located for delegates from the other Caribbean countries to attend.

Organized by Carib News Foundation. A non-profit project 501-C3 corporation.

09-3698 0013

**Thirteenth Annual Caribbean Multi-National
Business Conference Registration Form - Please Read Carefully
SAINT MAARTEN . NOVEMBER 6TH TO 9TH 2008**

Before you begin your application, you may want to gather your supplementary documentation so that you have it handy to fill in the information required in the online form. You must complete all sections of the application form except for, in some cases, section 4 (Transportation). After you have entered your data and click "Submit" you will receive a confirmation email within 24 hours. For more information please contact NY Carib News at 212-944-1991.

Step One - Applicant Profile
Please provide the following contact information.

*Last Name: Christensen	*First Name: Donna	Home Phone:	Mobile Phone:
*E-mail Address: jpholby.thomas@gmail.com	Business Phone: 302-929-1700	Business Fax: 302-929-2061	
Business Name: U.S. House of Representatives	Business Address (cont.):	City: Washington	State: DC
Business Address: 1610 Longwood		Zip: 20515	
Type of Business:	Area of Interest: Health		

Step Two Part A - Accommodation (Standard Rooms) Choose either Standard or Suite. Please choose an accommodation package, if you choose the double occupancy option, we ask that you provide the name of the person you will be rooming with while staying at the Sonesta West Beach Hotel. Please use this opportunity to make any special requests such as extra nights.

Single Night Rate For Standard Rooms - \$280 per night based on Double Occupancy and \$245 per night based on Single Occupancy. For information on accommodations outside of provided packages, please contact us directly.

Single Occupancy Package: Standard Accommodation - Single Double Occupancy Standard Accommodation - Double

Rooming with...
Christian Christensen

Special Requests:
None Golf Large

Step Two Part B - Accommodation (Suite Rooms - Limited Availability) Choose either Standard or Suite. Please choose an accommodation package, if you choose the double occupancy option, we ask that you provide the name of the person you will be rooming with while staying at the Sonesta West Beach Hotel. Please use this opportunity to make any special requests such as extra nights.

Single Night Rate For Suite Rooms - \$350 per night based on Double Occupancy and \$225 per night based on Single Occupancy. For information on accommodations outside of provided packages, please contact us directly.

Single Occupancy Package:
Single Accommodation - Single Double Occupancy Suite Accommodation - Double

Rooming with...

Special Requests:
None Golf Small

Step Three - Transportation
In order for us to arrange your ground transportation, it's required that we have your flight information.

Agency:	Flight Number:	Departure City:
Departure Date: 11/06/2008	Departure Time:	Arrival Time:
Return Date: 11/09/2008	Return Flight Number:	Return City:
	Return Departure Time:	Return Arrival Time:

STEP 4: PAYMENT
Please enter your credit card information, then click on "Submit Registration" to complete your online registration, wait a few seconds and you will be taken to a confirmation page. If you are paying by check, print this page and mail to NY Carib News with your check enclosed.

*Name on Card:	*Credit Card Type: Visa <input checked="" type="checkbox"/>
*Credit Card Number:	*Credit Card PIN# (what is this?):
*Expiration Date (mm/yy/yyyy):	

After you complete the Registration Form, please double check your information. If you have any questions, please call us directly 212-944-1991.

**MEMBERS OF CONGRESS INVITED TO THE
THIRTEENTH ANNUAL MULTI-NATIONAL BUSINESS
CONFERENCE, NOVEMBER 6-9, 2008, ST. MAARTEN, N.A.**

Congresswoman Diane E. Watson
Congressman David Scott
Congressman James Clyburn
Congresswoman Nydia Velazquez
Congressman Charles Rangel
Congressman Donald Payne
Congresswoman Donna M. Christensen
Congressman Edolphus Towns
Congressman G. K. Butterfield
Congressman Gregory Meeks
Congressman Jesse Jackson Jr.
Congressman Keith Ellison
Congressman Kendrick Meek
Congresswoman Maxine Waters
Congressman Melvin Watt
Congressman Robert Scott
Congressman William Lacy Clay
Congresswoman Barbara Lee
Congresswoman Caroline Cheeks Kilpatrick
Congresswoman Corrine Brown
Congresswoman Eddie Bernice Johnson
Congresswoman Sheila Jackson Lee
Congresswoman Yvette Clarke
Congressman Danny Davis
Congresswoman Stéphanie Tubbs-Jones
Congressman Bennie Thompson

July 2008

08/29/2008 02:00 FAX

09-3698 0015

08/29/2008 02:00 FAX

09-3698 0015

13th Annual Caribbean Multi-National
Business Conference Program
St. Maarten, N.A.

**THEME: A REGION IN TRANSITION - STRATEGY FOR
CHANGE - BUILDING ALLIANCES**

Thursday, November 6, 2008

12:00noon- 6:00pm : **CONFERENCE REGISTRATION -**

5:00 - 6:30 - **TOWN HALL FORUM - HEALTH**

Innovative Solutions for Life styles
Diseases- a Collaborative Approach -- Diabetes,
Hypertension, Obesity, Oral Health

Speakers - Dr. Denzil Douglas - Prime Minister, St. Kitts and Nevis
Mrs. Karen Boykin-Towns
Sir George Alleyne, Chancellor UWI
Hon Diane Watson, Member of US Congress
Health Commissioner, St. Maarten
Hon. Jesse Jackson Jr., Member of US Congress

6:30-7:30pm - **OPENING RECEPTION**

Venue: - **POOLSIDE**

Theme: - **A REGION IN TRANSITION -**

Speakers: - Faye A. Rodney
Hon. Roy Martin - Commissioner for Tourism - St. Maarten
Hon. Yvette Clarke, Member of Congress

MC: - Sabrina Hosang - Royal Caribbean Bakery

7:30 - 9:30 pm - OPENING DINNER

Venue: - Main Ballroom

Theme: - STRATEGY FOR CHANGE

Greetings:

Speakers : - Dame Billie Miller

Hon. Donald Payne, Member US Congress

Hon. Nick Perry, New York State Assembly

Hon. G.K. Butterfield, Member of Congress

10:00pm - 1:00am: - HOSPITALITY AREA

Friday, November 7, 2008

8:00am - 8:45am - (BREAKFAST)

9:00am - 6:00pm CONFERENCE REGISTRATION

9:00am - 10:15am - OPENING CEREMONIES

Venue: - Main Ballroom

Theme: - BUILDING ALLIANCES FOR PROGRESS

- Invocation:** - Rev. Susan Johnson=Cook
- Anthems:** - St. Maarten
Lift Every Voice
- Remarks:** - Eric Ewe
Karen Boykin-Towns
Marie Long
Ed Goldberg
Hazel Dukes
- Speakers:** - Hon. Carolyn Cheeks Kilpatrick - Member
US Congress
Hon. Melvin Watt, Member of US Congress
Commissioner Sarah Wescot-Williams, Leader
of Government, St.Maarten
- Keynote Speaker** - Hon. Charles Rangel -Member US Congress

-RIBBON CUTTING CEREMONIES

- 10:15am - 10:30am** - COFFEE BREAK - Golden Krust
- 10:30am -11:45am** - PRESENTATION

Theme: "Health - an Economic development Strategy
For the Region"

Speakers: - Hon. Donna Christensen, Member US Congress
Hon. Barbara Lee, Member US Congress
Dr. Carl Kenel-Pierre, Preferred Health Partners
Dr. Denzil Douglas, Prime Minister St. Kitts/Nevis
Hon. Yvonne Graham

10:30 - 11.45 - PRESENTATION

Theme - "Access to Capital - Creative and unique
Financial packages"

Speakers - Michele Chow Tai, HSBC Bank
Hon. Adolfo Carrion, Bronx Borough President
William Lacy Clay, Member of US Congress
Hon. Compton Bourne, President, CDB
Commissioner of Finance, St. Maarten
Hon. Keith Ellison, Member US Congress

12:00noon - 1:15pm - PRESENTATION

Theme: TRAVEL & TOURISM -
Need for a Competitive Transportation Network
Emerging Tourism Market
Health Tourism

Greeting: - Dale Morris

Speakers: - Hon. Gregory Meeks, Member of US Congress
 Hon. Allan Chastanet, Minister of Tourism, St. Lucia
 Hon. Roy Marlin, Commissioner of Tourism,
 St. Maarten
 Hon. Bennie Thompson, Member of US Congress

12:00noon - 1:15pm PRESENTATION

Theme - Technological Innovation - A Path to Economic
 Development

Speakers: - Marilyn Johnson
 Hon. Edolphus Towns, Member of US Congress
 Hon. Eddie Bernice Johnson, Member US Congress
 Colin Ward
 Hon. Edolphus Towns, Member US Congress
 Commissioner of Technology, St. Maarten

1:30pm - 2:30pm LUNCHEON

Venue: - Main Ballroom

Theme: - BUILDING A WINNING STRATEGY - PARTNERSHIPS
 THAT WORK

Speakers: - Hon. Nick Perry, NYS Assembly
 Eric Eve
 Hon. Jesse Jackson, Member US Congress

Keynote Speaker - **Hon. David Paterson, Governor New York State**

3:00pm - 4:00pm

Round Table #1 - **NEXT GENERATION -**

Business Retention and Expansion

Speakers

- **Sabrina HoSang**

Lita Balram

Karlisa Rodney

Hon. Yvette Clarke, Member of US Congress

Hon. Kendrick Meek, Member of US Congress

Round Table #2 - **LOCAL BUSINESS INITIATIVES -**

Opportunities with US Companies

Speakers :

- **Ed Goldberg**

Eric Eve

Cheryl Monroe

Albert Brown

- **Hon. Nydia Velazquez, Member US Congress**

Member of Congress

Round Table #3

- **HEALTH -**

QUALITY HEALTH CARE

HIV/AIDS Programs in the Region

6

4:30pm - 6:00pm - TOWN HALL FORUM - EDUCATION

Speakers: - Dr. Edison O. Jackson
Patrick Gaston
Hon. Sarah Wescot-Williams, Commissioner of Education, St. Maarten
Hon. Danny Davis, Member of US Congress
Hon. Barbara Lee, Member of US Congress
Professor Rex Nettleford, UWI

Venue:

6.30:00pm - 7:30pm - HOST COUNTRY EVENING

Venue: - TBD by St. Maarten

Theme - TBD by St. Maarten

MC:

Speakers: ST. MAARTEN PROGRAM

7:30 - 8:00 pm:

8:00pm - 10:30 pm.

Venue :

Theme ST. MAARTEN PROGRAM

Speakers: Hon. David Scott, Member of US Congress
Hon. Stephanie Tubbs-Jones, Member of Congress

7

10:00pm - 1:00am - **HOSPITALITY AREA**

Venue:

Saturday, November 8, 2008

8:00am - 10:00am - **WOMEN'S BREAKFAST**
WOMEN OF INFLUENCE AND POWER

Venue: - **Main Ballroom**

Speakers: - **Hon. Stephanie Tubbs-Jones, Member US. Congress**
Hon. Maxine Waters, Member US Congress
Hon. Sheila Jackson-Lee, Member US Congress
Hon. Barbara Lee, Member US Congress
Brenda Scott
Marilyn Johnson
Hon. Sarah Wescot-Williams
Rev. Dr. Susan Johnson-Cook
(List in development)

10:15am - 11:45am - **PRESENTATION - EDUCATION**
A Collaboration with US Institution *Thinkfinity*
UWI/Medgar Evers College Initiatives

Speakers: Dr. Edison Jackson
Patrick Gaston
Hon. Yvette Clarke, Member US Congress
Hon. Danny Davis, Member of Congress

10:15am - 11:45am - **PRESENTATION - AGRICULTURE**
A New Emphasis in the Region - Can it Survive
Globalization.

Chair & Greetings:

Speakers: Hon. David Scott, Member US Congress
Hon. Gregory Meeks, Member US Congress

11:00am - 1:00pm All Members of Congress are requested to attend
Closed Door Meeting with Prime Ministers,
Ministers of Government of the Caribbean,
Commissioners, to review US/Caribbean Relations

12:00noon - 1:15pm - **PRESENTATION - TRADE & INVESTMENT**
Retooling for Growth
Community Capitalism

Speakers: Hon. Maxine Waters, Member US Congress
Hon. Nydia Velazquez, Member US Congress

Panelists:

12:00 noon - 1:15pm

- PRESENTATION

Theme

***Hemispheric Security - Ports/Airports -
Crime - Drugs - Disaster***

Speakers

- Hon. Bannie Thompson, Member of US Congress**
- Theo Heylerger - Commissioner of Ports, St. Maarten**
- Hon. Yvette Clarke - Member US Congress**
- Hon. Lance Ogiste, Brooklyn District Attorney**
- Dr. Basil Wilson**
- Hon. Keith Ellison, Member of US Congress**

1:30pm - 2:30 pm

LUNCHEON

Theme:

CARIBBEAN - A SOLID INVESTMENT

Speakers

- Hon. Charles Ranel, Member of US Congress**
- Hon. William Thompson, NYC Comptroller**
- Dr. Compton Bourne, President CDB**
- Dr Enrique Riggs**
- Javier Evans**

Round Table #1

EDUCATION

Speakers

Hon. Danny Davis, Member of US Congress

Hon. Eddie Bernice Johnson, Member US Congress

Round Table#2:

IMMIGRATION

Hon. Maxine Waters, Member US Congress

Hon. Sheila Jackson-Lee, Member of US Congress

Dr. Marco Mason

Round Table#3:

HAITI - HOPE II - Diaspora Initiatives

Hon. Charles Rangel, Member of US Congress

Hon. Kendrick Meek, Member of US Congress

Round Table# 4

MICRO FINANCING - CONFERENCE GENERATED

Laura Blackburne

Hon. Keith Ellison, Member of US Congress

Lucille McEwen

Michael Flanigan

4:30 pm - 6:00pm

TOWN HALL FORUM - TECHNOLOGY

Venue:

Speakers - Marie Long
 Marilyn Johnson
 Colin Ward
 Al Brown
 Hon. Corrine Brown, Member of Congress
 Hon. James Clyburn, Member of Congress
 Commissioner on Technology

6:30 - 7:30pm - GALA RECEPTION

Speakers - Hon. James Clyburn, Member of US. Congress

7:30pm - 10:00pm - GALA DINNER & AWARDS PRESENTATION

Speaker - Hon. Charles Rangel, Member of US Congress
 Hon. Sarah Wescot-Williams, Leader of Government
 Business

AWARDS PRESENTATION

ENTERTAINMENT

10:30pm - 1:00am - HOSPITALITY AREA

Venue:

Sunday, November 9, 2008

8:30 am - 10:00am - **POWER BREAKFAST**

Theme: - **SPIRITUALITY - THE BASICS IN BUSINESS**

Speakers - **Rev. Susan Johnson Cook**
Ed Goldberg
Lowell Hawthorne

Selection: - **Local Choir**

August 14, 2008

13

08/28/08

08/28/08

08/28/2008 02:02 FAX

09-3698 0028

EXHIBIT 2

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended.

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re: Delegate Donna Christensen
Review #: 09-3698; 09-2222; 09-2567; 09-4403; 09-6333
Date: May 4, 2009
Location: 1510 Longworth HOB, Washington, DC
Participants: Leo Wise
Beth Horton

Summary: Delegate Christensen attended the 13th Annual Caribbean Multinational Business Conference. We requested an interview with Ms. Christensen and she consented. Delegate Christensen was given an 18 U.S.C. § 1001 warning and she signed a written acknowledgement of the warning. Ms. Christensen made the following statements in response to our questioning:

1. She attended the 13th Annual Caribbean Multinational Business Conference in 2008.
2. The conference was held in St. Maarten.
3. She arrived in St. Maarten on the Thursday after the election and remained in St. Maarten through the following Saturday.
4. She has had a long relationship with the Carib News Foundation and she introduced the topic of healthcare at the 2008 conference. She is always invited to participate at the conference.
5. Carib News sponsored the conference.
6. She attended a town meeting when she arrived at the conference.

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

7. The Rodneys owned the Carib News paper.
8. She assumed the Foundation arm is not unlike other companies not-for-profit arms.
9. She was invited to the conference via letter, but is not aware who signed the letter. Carl and Faye Rodney would have been responsible for inviting her.
10. The government of St. Maarten participates with the Foundation in holding the conference and the government hosts a reception and welcomes participants at the opening. The head of the government speaks at discussions with other heads of government and arranges some type of cultural performance, such as a children's choir.
11. As far as she knew, Carib News sponsored the conference.
12. She understood that the sponsor would be responsible for setting up the hotel, organizing the agenda for the conference, and inviting individuals to participate.
13. The Foundation paid the expenses for the conference.
14. When asked if the Foundation paid all of the expenses, Ms. Christensen asked if the answer was in the record; she was told by Mr. Wise that the board has the post disclosure report. She stated that the Foundation paid for travel and hotel expenses and general activities at the conference that conference participants attended.
15. She saw her airline ticket.
16. She did not recall seeing a hotel bill but she remembered checking into the hotel and stated that she probably received a bill when she checked out because she was responsible for any incidental expenses.
17. She did not know if the government of St. Maarten paid for her hotel room.
18. She paid for one breakfast herself and recalled that the hotel was an all-inclusive hotel and that all other meals were part of the conference. She further stated that the government of St. Maarten paid for a reception, which included food, and that she attended the reception.
19. She attended a dinner on Thursday night which she assumed the cost of was paid by the Foundation.
20. Shelly Thomas handled all of her travel arrangements.

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended.

21. The Foundation booked her travel with Shelly's help. The Foundation would have arranged the airline ticket because the organization had its own travel agent.
22. She stayed at the hotel Thursday and Friday night and that she stayed in a standard room. She recalls that there was a desk in the room and a balcony but she doesn't recall there being more than one room.
23. Her husband did not attend the conference.
24. All travel is arranged with Shelly Thomas. She tells Shelly when she can travel.
25. The Foundation handled travel approval directly through the ethics committee and she and Shelly handled post travel reports.
26. Shelly filled out the post-travel form and that she signed the form. It is her signature on the form.
27. She guessed that Shelly knew the hotel cost but that she did not know where the information for the reported dollar amounts came from. She stated that when she registers at conferences, most places provide the cost of the room.
28. She stated that the office attended the CBC training.
29. The handwriting on the post-travel report looked like her handwriting but she was not sure, she believed that Shelly filled out the form.
30. She believed that she received a letter that included the post-travel information, including the dates of travel. She believed that the Standards Committee would have approved the trip prior to her receiving the invitation.
31. She may have seen the private sponsor certification form, she believed that she would have seen it because she could not have attended without clearance from the Standards Committee.
32. She did not believe that she had any direct contact with the Standards Committee as Shelly was the only person who dealt with the conference.
33. When asked if there were any issues with the 2007 conference in Antigua, Ms. Christensen didn't believe there had been but she was not certain.
34. She stated that she asked other Members if they would be attending the conference.

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended:

35. She does not recall receiving approval from the Standards Committee for the 2007 conference.
36. She has not met with Standards regarding any travel matter.
37. She had asked other Members at a CBC meeting if they would be attending the conference and she reminded those that would be attending to get their paperwork to the Standards Committee on time for trip approval.
38. She did not speak with any Members of the Standards Committee regarding the conference except for Representative Stephanie Tubbs Jones. She only spoke with Representative Tubbs Jones because she herself was attending the conference.
39. She stated that Representative Tubbs Jones counsel, Dawn Kelly Mobley, may have attended a meeting where she was present and that she may have brought information to explain what the Members could and couldn't do under the new rules.
40. She did not recall any one-on-one conversations about the '08 or '07 conference.
41. She arrived at the conference on Thursday and recalls seeing the banner that listed the conference sponsors. It appeared in all rooms.
42. When asked what the role of the corporate sponsors was at the conference, Ms. Christensen stated that they contributed to the Foundation.
43. She stated that she did not know what made the Foundation the sponsor, she was not aware of that type of detail. Most of the companies have some type of sponsorship at the conference. She did not know if they gave directly to the Foundation or to the Conference. The sponsors generally greet participants and participate in the introduction and at the reception.
44. The definition of sponsor had been explained to her, not in reference to the '08 conference but in general it was explained to her. She recalled discussing what she generally could and couldn't attend.
45. She attended the dinner on Thursday but does not recall if Representative Payne thanked the sponsors.
46. Representative Payne generally talks about issues that he is involved in when speaking at the conference.

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

47. She spoke at the conference and at the Town Hall meeting. She also participated in another panel but the Town Hall was her main involvement. And she attended the opening session.
48. She recalled Representative Kilpatrick speaking at the conference but she did not recall any specific remarks.
49. She was aware that the Foundation was the sponsor of the conference. It did not occur to her that the information on the pre-travel certification was incomplete.
50. She was not aware of how the expenses for the trip were paid, once the Standards Committee approved the trip then she knew she could go and didn't think any more of the trip sponsor.
51. She did not attend the closed door meeting.
52. She generally spoke about deportation and how it affects countries. Trade is also a large issue, and Haiti.
53. She did not receive any reports on any sessions at the conference, not in any formal way. She may have received something in '07 but she could not recall for sure.
54. She participated at the ribbon cutting at the '08 conference. Heads of government and the Rodneys also attended.
55. She recognized the photo that was taken at the ribbon cutting, she recognized her skirt in the picture. She knew the Macy's representative and Representative Kilpatrick, who were also in the photo, and thinks one of the individuals may have been the AT&T representative.
56. She did not meet with any of the co-sponsors, there was no specific meeting. The conference meetings have never been about company specific issues.
57. She attended other sessions at the conference, Representative Kilpatrick also attended one of the sessions that she attended.
58. She attended the opening ceremony, the health and economic sessions, the reception, the ribbon cutting, and the women's breakfast meeting. She can't recall if she attended the education session and she did not go to the hospitality area.
59. The Rodneys attended a luncheon/dinner on the Hill after the conference.

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

60. She did not talk about the conference itself with the Rodneys, other than that she knew of the investigation.
61. At a Caribbean Caucus meeting she spoke with Representative Payne and Kilpatrick about the fact that they were all going through the investigation.
62. She talked with Representative Payne briefly, just in passing, noting that they did not like the new ethics rules.
63. Representative Kilpatrick shared a letter with her that she had been sent since they were both being investigated.
64. She did not have any in-depth conversations with any Members, the Members merely spoke about the fact that they were not happy about the investigation.
65. There were no discussions at any CBC meetings because they felt that they were not supposed to talk about the investigation.
66. She does not attend any events without receiving approval from the Standards Committee. After receiving approval, she does not ask any questions about who is paying the expenses. She assumes all questions have been asked and answered by the Standards Committee. So, nothing she saw at the conference would have raised any flags.
67. She believed that the Foundation is involved in various activities in NY but does not know of any specific activities.

Beth Horton
Investigative Counsel

Exhibit 3

TRANSCRIPT OF AUDIO FILE:

11-7 AM SESSION - FIRST 30 MIN

Thank you for working with Accentance for your transcription needs. The text below represents a professional transcriptionist's understanding of the words spoken. No guarantee of complete accuracy is expressed or implied, particularly regarding spellings of names and other unfamiliar or hard-to-hear words and phrases. "(ph)" or "(sp?)" indicate phonetics or best guesses. To verify important quotes, we recommend listening to the corresponding audio. Timestamps throughout the transcript facilitate locating the desired quote, using software such as Windows Media or QuickTime players.

BEGIN TRANSCRIPT:

KARL RODNEY: ...Mike Flanigan how through the year his division has been supportive of the Mission and the Conference. And so we want to say thanks to Citi. You'll be hearing from Mike later but it's a great team to have working and great partners. We have Pfizer and a big supporter of (inaudible) aspect. Karen Boykin-Towns is not here, she has been able to in the past eight years and there's a death in her family and so she's not here to begin. Through the years work had done in the Caribbean circle in the United States and then a special touch to our work that can be done not only on the delivery of health care but overall awareness. [0:01:00.4]

And over from Macy's and its very fine team has been innovative in outreach to various locations we've gone to, finding new vendors, developing new contacts and really helping to make the conference a success by engagement of our local participants. So Ed and Brenda are tremendous supporters and we're so delighted that they're here with us.

IBM and Marilyn Johnson, Marilyn is Vice-President of Market Development, responsible for strategic marketing for Black, Asian and Hispanic, Native American and Women. Marilyn's a dynamic partner and you'll be hearing from Marilyn also. You should be alerted that between Brenda and Marilyn tomorrow is Women's sessions is going to be something to talk about. [0:02:09.5]

Marie Long is here from ATT but ATT has supported the Conference all 13 years. We started with them. They made sure that the Vision, the Mission of the Conference is supported through the many years.

We have with us Mr. Pat Gaston. Mr. Gaston is the President of Verizon Foundation, one of the largest private foundations in the United States. And Mr. Gaston has made his mark in moving that foundation to be a force in education in the United States. We are delighted he is here to be with us and to introduce a wonderful program that has been very effective in the United States (inaudible) to see if there is potential here in the Caribbean. So, Patrick, we are delighted you are here and we look forward to your presentation. [0:03:14.9]

Preferred Health and a wonderful group of doctors, Dr. Valdez, Dr. Carl Kenel-Pierre, Dr. Kernisant, a group of doctors who have a network of centers through the United States but they also see and want to have that expanded to the Caribbean and also to bring a new kind of emphasis with respect to health tourism to the Caribbean and so they're here today also.

Dale Morris from American. American has been a partner with us for several years. Dale is expected to come in later on today but we want to acknowledge American and want to say "thanks".

Lloyd Williams from the Harlem Chamber of Commerce enough of his members are around and Lloyd has been supportive of this Conference from its inception and the Chamber has always been here with us and so we want to say "thanks" to Lloyd. [0:04:20.9]

Medgar Evers College under the dynamic leadership of President Edison O. Jackson has not only brought to the Caribbean a new vision of education, a new initiative with respect to men and empowerment but also the team that you see moving around they're from Medgar through the instrumentality of President Jackson working with us to document the Conference. It will be available too for a widespread distribution afterwards. So Medgar has been a true partner in making this Conference and this Mission work. [0:05:07.0]

Turner Construction, we have had a working relationship with Rev. Hilton Smith, he has attended several conferences and now he's with his colleague John Pierce to be a partner in the Mission of the Conference.

And, of course, the government of St. Maarten's under the dynamic leadership of leader Sarah Westcott-Williams and her dynamic team. We have always been working with - we always work with the leader and her dynamic group and we are just delighted at her own creative vision, her own determination and dynamic way of dealing with the Mission and dealing with the situation at hand. And we met with Commissioner Westcott-Williams and her team and she had a vision to suggest the theme of the Conference, time of transition, stretching for change and building the land session. So it was with that kind of background that we're here and to St. Maarten's we say, "Thank you very, very much." [0:06:31.4]

We have so many great partners that we shall hear from throughout the morning. We have through the Conventional Black Caucus and their members a set of agendas that have been accomplished, policies that have been achieved and programs that have been enhanced. And through the years they have been very effective when they have attended the Conferences our own (inaudible).

It was here at St. Maarten's six years ago that a group of hoteliers and vendors approached the members of our caucus to suggest that the Caribbean had been treated unfairly with respect to the duty-free allowance going into the United States. And it was within six months that it was changed through the effort of the members of the Black Caucus and so the Caribbean is better. And the Caribbean has benefited through millions of dollars of duty-free items that you know come through to the Caribbean.

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It was also here in St. Maarten's that the issue of tax exemption for conferences held in the Caribbean was again brought to the attention of the members of the Congressional Black Caucus and again that was achieved within a year. [0:08:08.2]

And so we've seen that kind of work constantly throw it's really the conference. So we can try to serve real achievement in fact in this room there is a couple that came from Denver to Barbados for their first Conference and they have built a region wide distribution for ice cream and fast food. And this has grown considerably.

It was also through the Conference that a small technology company with the value of \$2 million came, got a contract and that company in two years became a \$12 million company. And we've seen that kind of connection throughout the Conference. We could point to Barbados where technology was enhanced with respect to ATT work with the local Barbadian telecommunication company. St. Croix the fiber optics center, Grenada an oil refinery, all coming up with the expertise of the Conference to the (inaudible). [0:09:30.7]

And so the Mission is there to continue, the Mission is there to enhance, the Mission is there for us to make it work particularly now when we see the change has come and we can now come together to pad the agenda and to look forward to this kind of strategy for change. And so we want to welcome you. We promise that our sessions are going to be interesting. We have some of the best speakers that you can find on the various topics. We're going to see more when we get together the support we can bring to each other. The support we can provide with respect to the met work and certainly when we go back in the Caribbean we can really see results. We can come together as a people. You've been a great Conference. Thanks so much for being here. God bless. [0:10:28.4]

REV. DR. SUZAN JOHNSON-COOK: Thank you Mr. Rodney and we also thank you Mrs. Rodney as well. With interest we're here on the wave of the man who campaigned about change and on this transition to change and also strategic alliances. And we hope that will happen for you while you're here. Mr. Vide mentioned all of the sponsors who were with us and the partners who helped to make this happen and we're going to hear from three of them at this time at this quarter, Michael Flanigan from Citibank (Citi) and Ed Goldberg, Senior Vice-President at Macy's and Community for the Relations, and Patrick Gaston the President of the Verizon Foundation. In that order we will receive them this morning as they come, please. (clapping) [0:11:15.6]

MICHAEL FLANIGAN: Good morning.

ALL: Good morning.

MICHAEL FLANIGAN: It's really a pleasure to be here. As you heard before, Eric is on his way so I have the great privilege and honor of putting in for Eric. But first just wanted to say "thank you" and again welcome to the 13th Annual Caribbean Business Conference. This year was significant for Citi. For the first time we are the lead sponsor of this premier event. But I would be remiss in not thanking the organizers and our hosts here at St. Maarten so to the

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government, to the Commissioner Sarah Westcott-Williams, Governor Franklin Richards and Commissioner Roy Marlin and all the other elected officials here in St. Maarten and elected Congress members, appointed officials from the United States it's a pleasure to be here with you. [0:12:15.6]

We also of course have to thank the Rodney's as being 13 years in ensuring that this vision is carried out and delivered all across the Caribbean and I don't call to talk about some successes but I think one of the most important success that I think that I've experienced in coming to the Conference for the last six or seven years is just reunited with his great family. It's all about developing our communities. About we're all about the same thing, I think. We're all on the same page. We're all about the same agenda. And we're all about making sure that we absolutely care about each other, yourself but we care about the broader community. So it's always a pleasure to be here. I get re-energized every time I come. And so it's - I look forward to it - so it's one conference that I will never miss.

This Conference is an important gallery that makes a tangible contribution to dialog on the issues of important to communities. From recognizing the untapped wealth for underserved communities to building property alliances so that together we can build healthy, robust, organic economies. Today and tomorrow and even into Sunday are very important to that conversation at least to building a winning strategy to succeed in these turbulent economic times. I trust that we will all take full advantage of the great minds and the leaders that we are privileged to spend time with. I know my Citi bank black (inaudible) are ready. Thank you so much for having us here at Conference. (clapping) [0:13:58.2]

ED GOLDBERG: Good morning everyone.

ALL: Good morning.

ED GOLDBERG: As Mike said it's really a pleasure to be back with family today. We look forward to this Conference very year. Obviously, we hope that there will be many, many more over the years to come. I learned something from David Dinkins several years ago when you have a whole list of dignitaries in the house, the best thing to say is, "Present, protocol observed." So, Mr. Mayor, thank you for those kind words. (laughter)

Now a week and a half ago, Macy's celebrated its 150th anniversary. (clapping) When you think about anniversaries of companies today to believe that somebody could be around in the retail industry in particular for 150 years is quite an amazing feat. I'm sure that when R. H. Macy opened his store in lower Manhattan on 14th Street on October 28, 1858, he did not have the vision that the company some day, number one would last for 150 years; or that it would employ 225,000 people; or that they would do \$27 billion a year in business; or for being in 46 of our 50 states; and also the opportunity of having a business in 64 or 65 major markets in the United States. [0:15:30.9]

But today I'm hear to talk more about the Caribbean contract. The fact that we have been supportive of Carolyn Fay and this particular venture for the number of years but more importantly the fact that we come here to look for that spark that will ignite an opportunity to

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find that next Martha Stewart; that next design; or that new product that's going to sell in our stores such as we've done with the Rwandan peace baskets and products like that. And I think it is really why our Mission is so important, it's not just a question of change, not just a question of transition but it's building those ties and looking for those opportunities. That I think will bring us closer together. [0:16:15.9]

There's no question that we all face difficult times but I believe that the Caribbean is our backdoor and the bottom line in opening for us for expansion. No, I don't think we can build 250,000 sq. ft. mall stores but Macy's has to learn in transition how do we conduct business in the Caribbean communities. And I think we're going to find that way and obviously this particular convention is one of those opportunities to do so.

You all know Brenda Scott, my wife, (laughter), Judy's back in the room sleeping so I can say that. But Brenda and I have been together for more than 20 years. We have obviously been very much involved in our communities where we do business and we still believe we have a long way to go. But our mission is being supported by a great Chairman, Terry Lundgren, and the people of Macy's, so obviously we look forward to developing these bridges and developing the relationships. And I hope that in the not too distant future, we will be talking about a Macy's store here in the Caribbean. So enjoy your convention. I hope I'll get a chance to talk to each and every one of you as the time goes by over the next couple of days. And again, thank you so much, Carolyn Fay for the great work that you do. (clapping) [0:17:32.9]

PATRICK GASTON: Good morning everyone.

ALL: Good morning.

PATRICK GASTON: Thank you, Karl, for the wonderful introduction. Thank you, Michael and Ed for these great remarks. I extend welcome from our CEO, Ivan Seidenberg, and our 225,000 employees, many of whom are from the Caribbean mason including me. I want to acknowledge my colleagues and members of the public sector, members of the community, and I also, I guess, want to respect present protocol. Okay, but I have to single out a couple people, right? So thank you to the leader of government Sarah Westcott-Williams for hosting us today and the great people of St. Maarten. It's a delight to be back here. This is my eighth time in St. Maarten and I may stay. (laughter) It's wonderful. I want to acknowledge Karl Rodney for his exceptional ability to bring people together to recognize the collaborations that are important for business development. He does so with the grace that I admire and it's the first time I've had the chance to be here with you, Karl. and it's an honor to be here and a privilege so thank you for inviting me. [0:19:06.0]

I want you all to recognize Rex Nettleford, I don't know if he's in the audience still. But Rex and I have known each other for about nine years when I first joined the Foundation of the University of West Indies Board of Directors. And one of the things that attracted me to the University in addition to Karl, of course, was that Rex was the kind of leader that reflected a lot of commitment and enthusiasm about education; something that I care deeply about. And over the years has provided me with his counsel and friendship and I thank you for that, Rex. (clapping)

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You know. Verizon does not have a retail presence in the Caribbean and I hope some day we will. But we do provide global Internet networks that help to provide a lot of communications that you might experience here. So I think we're in the game and we realize the value of technology to ensure that folks have access to incubation and education. In my case at the Verizon Foundation, Karl mentioned that I head up the Verizon Foundation and our emphasis is on education. And what we're trying to do is deliver resources to teachers in the classroom that need it really badly. So we're developing contact and we're taking with our partners, we're taking that contact and making it available through our technology platforms so during the course of today in the discussions that we'll have, we'll talk about that resource. Which, by the way, is offered free of charge to teachers around this country and now around the globe, so we want to make sure that we present this resource as another thing that this community can use and use it in a way that's free. So I'm looking forward to this dialogue and am excited about this Conference and I thank you very much, Karl, for inviting us to hear quality. [0:21:06.2] (clapping)

REV. DR. SUZAN JOHNSON-COOK: Thank you very much. I loved language in school. I remember ottomottopea and phizz and those words and oxymoron, best of times, worst of times, homonyms, the words that sounded alike with different meanings but synonyms when you said the word you could understand what it meant. It was synonymous with something. So when we say the words, "front line", "civic leader", "activist", "Miss NAACP", "world leader". "you don't want to mess with her", you know it is synonymous with Hazel Dukes and we want to hear from her, our God, mother, our community, don't you think I'm right? (clapping) Miss NAACP, Miss Leader, our dignitary, let us receive this morning, the Honorable Hazel Dukes of New York City. Are there any New Yorkers in the house? (clapping) Let's get a little noise over here. All right.

HAZEL DUKES: Good morning.

ALL: Good morning.

HAZEL DUKES: This is my 12th Conference. Missed only one because I had a broken ankle and it was just like four weeks before the Conference, not even, be on the cast. But let me say to Fay and Karl that they have been the glue without the (inaudible). They are for us 24-7. Not only just in New York City but the Islands we have attempted. The NAACP will be celebrating its 100th anniversary in New York City where it was founded July 14 through July 17. Medgar Evers, the college, the university, the (inaudible) of the city of New York, when George Blackburn and I sit and watch TV and we hear all people go over their history, people forgot that it would not have been possible if it was not for those names, Medgar names known or so many others in Alabama for Rosie, decided to sit. So Maude could stand. Maude could not have stood if Rosie hadn't of sat. Rosie was the Secretary of the NAACP, the National Association for the Advancement of Colored People. The Colored People come in all colors, when you make your beautiful salad you just don't want all greenery in it. Even with your omelet this morning you could have a mixture, of beautiful flowers I have to have all colors. And so for a hundred years this old ship resigned, been around. Lord, I was reminiscing last night Congresspersons who we went to the Congressional Black Caucus there was only six. We used to be at the Hilton Hotel. And we held court. When we started in Albany there was no black and Puerto Rican caucus, there was the

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now, the next mayor for the city of New York, Bill Thompson's father, who was the regional director for the NAACP who went on to be now retired. [0:24:54.4]

It would not have been 106 mayor of New York City of Percy's son, a former President of the New York City branch of the NAACP, Balford Calison (sp), Secretary of State and now the government of the state of New York has his first job at the NAACP. So I want us to learn history so we can have our brothers and sisters in (inaudible) and those who are coming to the shore of these United States to understand the kitchen of our connectiveness to (inaudible). How soon you could forget the history that those from the Caribbean have played to make America what she is today. [0:25:44.8]

And so I join with Karl and Fay every year I trek here because they joined with me in New York City trying to break the (inaudible) of the two communities because Rolly Johnson said this morning, Cook said this morning, Johnson Cook said this morning. "When we join hands together, when we come and talk about the multi national conference, we're global now, we can't think we just in Brooklyn, we just can't think we in the Bronx, we just can't think we in Manhattan and in Queens and Staten Island. We are all over this country. And when we saw the crowd of people, black and white, Jew and Gentile, Muslim, Asians, all across this country who came out for Obama, it is a change in America. And then we African-Americans and the Caribbean's have to absolutely solidify our tie. Because if America is to be what she was born to be, it would be that so on behalf of our new President Ben Judds who I'll promise will be here next year, 35-year-old Rhodes scholar, ingratiating young brother who is so excited where we are going. And my sisters in the Congressional Black Caucus and my brothers, we going to get it together. As our Congresswoman told us yesterday, "We're tired of talking about it. It's (audible) we are sick and tired of being the sick and tired." And so when we leave here, we will be better off because we came together to make new friendships, to re-energize and I would say to Karl and to Fay, our sincere gratitude to you for bringing us together as a family each year. Some of us even don't have enough time to sit. That's why Laura convinced me to come a day early. Even if I don't know what's happening with my 401K (laughter) I'm nervous, Mr. Comptroller man. I don't know about vacation but we thought it not right not to come here and be with our family. Thank you so much. [0:28:13.4] (clapping)

REV. DR. SUZAN JOHNSON-COOK: We thank you so, so much. He began his second term in January 2006 as the 42nd Comptroller of the City of New York. He's come from a distinguished parenthood, a famous judge and a mother as a public school teacher, but he has distinguished his own path. And he has become a wonderful Comptroller of New York City and he has responsibility for all the city's pension funds. He's just a good brother. He's here with us today, hope to be the next mayor of the city of New York. Let's put our hands together for William C. Thompson, Jr., the Comptroller of a great city of New York, New York. All right?

WILLIAM THOMPSON: Thank you Reverend for that very wonderful introduction and it's good to see you here as our Master, or Mistress of Ceremonies, this morning. And I go ahead and make a mistake. I should have had the Mayor open up for me because he always does it correctly. But to our leader of government, Commissioner Westcott-Williams, to the members of government here in St. Maarten, my colleagues in government all over the United States, friends, good morning.

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ALL: Good morning.

WILLIAM THOMPSON: It is definitely a pleasure to be back again even though following Hazel to the microphone is always an indubitable thing to do. [9:30:01.1]

END PART 1

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TRANSCRIPT OF AUDIO FILE:

11-7AMSESSION - 30 THRU 75 MIN

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BEGIN TRANSCRIPT:

(Part 2 -- beginning at 30:00 through 1:15)

WILLIAM C. THOMPSON, JR.: - It's good to be back again and let me first start out by thanking, and I always term them as I did last year and I have continued to do it over a period of time, termed them the "dynamic duo," Faye and Karl Rodney. [applause at 0:30:16.7] They happen to be, when it comes to vision - and that's exactly 13 years ago when putting this conference together, they had a vision. It is something that they have never taken a step back from. They continue to move forward, they continue to bring us together. And while we have the opportunity to meet, to have conferences in some wonderful places, just fabulous environments and that is the truth, but they work us, okay. Karl and Faye let us understand that we may meet in a wonderful environment, you walk outside and it's gorgeous, but we are here to accomplish things. [0:30:58.7]

Karl mentioned when we were here before, and I remember the discussions with the members of the Congressional Black Caucus, and it wasn't just those who owned hotels, it was members of government who had indicated then that the (inaudible) \$200 dollar duty-free or the amount that you could bring in the country hadn't changed in decades, in years and years and years. And I remember that members of the Congressional Caucus, the Congressional Black Caucus led by Congressman Charles Rangel, the Chairman, and now he wasn't the Chairman at that point, he went back to Washington and in a period of months the amount had doubled from \$200 to \$400 dollars. It was the right thing to do but you saw the power of this Congress. As I said, we might come together in wonderful places, but it is about business. It is about increasing the ties. It is about the business between the Caribbean and the United States and increasing those business opportunities, helping to raise the standard of living for many; helping to build businesses and institutions, that's what it is about. [0:32:09.5]

Last year, Karl had me down here and - no I'm sorry, last year after our conference I worked. I must admit, Karl had me as a luncheon speaker, we were outside, it was about 85 degrees and I was in a tie okay, I was in a suit and tie and it took me a couple of hours afterwards to dry out. But the one point that was made then was Karl looked at me, and those of you who know me in the

introduction as New York City's Controller, I'm a member, a trustee of four of our five pension boards, chief investment advisor to all five. Our total assets in knowing, it might have shrunk a little, but our total assets are about \$95 billion dollars right now. We are the fifth largest public pension fund in America. [applause at 0:33:02.4] At that point Karl looked at me and said, by the way how much of that is invested in the Caribbean basin? How much of that money is going to create, to build infrastructure, to help with tourism, healthcare and other things? And it was an impressive question and I went back and the answer was not much. Not much, so we started to go at that point down the path of looking at investment possibilities in the Caribbean basin; obviously a very promising area. [0:33:42.0]

To go back to quote just a couple of numbers as we would look at - now it has been a tumultuous year on Wall Street, at the same point, many of the investments, as we were termed that we have made in the emerging markets around the world, have outperformed developed markets. For instance, one year, three year, five year performance of emerging market equities has been on par or better than the United States private equity, the United States venture capital, Western European private equity and U.S. public markets. Clearly it makes sense for institutional investors to begin to move further into those waters of emerging markets. [applause at 0:34:25.8]

So we went back and started to engage, particularly we looked at private equity, and the way we invest usually isn't directly it is in private equity funds, so we began and our private equity consultant, we asked them to take an initial look at the Caribbean basin for how much initially should we be investing. And the number that they came back with was \$80 million dollars. That would be our first step into investment in the Caribbean basin through a variety of investment vehicles. We started to move down that path and unless I am wrong, and if I am I will be short a few people or I will loose a few people in my investment side, but I believe that yesterday back in the office, back in front of one of our pension boards, we approved the first application of \$30 million dollars to be invested in the Caribbean basin. [applause at 0:35:25.8] And, we are going to continue to move forward through other investment vehicles to invest and commit, or really to commit and invest, the additional \$50 million dollars and then we will take a step back and look for other possibilities. [0:35:46.8]

So I just wanted those to know that conversation, that investment of money, and as I pointed out it will range in everything from real estate to infrastructure, industries ranging from healthcare, financial services, energy, telecom, tourism and other areas, but that started last year at this conference. [applause at 0:36:09.8] So to those who say, "Jeeze you are going to St. Maarten? Have a wonderful time. I know you are going to spend a lot of time on the beach," Karl and Faye make sure that we are working hard and that we are getting things done. [0:36:28.6]

And at this conference, while it is great to see friends and colleagues and some people I don't get to see for a year, we are here working and we are here making sure that we increase and bring closer those ties that we have had in the past and that we are helping to grow business, that we are helping to improve quality of life both here in the Caribbean and back in the United States.

So again, it is a pleasure and let me say again to Karl and Faye, thank you so much for the leadership that you have shown. We look forward to your continued leadership for years to come. Thank you so much. [applause at 0:37:04.2]

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REV. DR. SUZAN JOHNSON-COOK: Thank you for working hard while you are here and even back at home. Thank you. It is so good to be together. We do get to sit down and talk to each other here. We try to get on each other's calendars in the City and we never do, but here we are able to make and transact business and it's wonderful.

As a point of personal privilege, it is not everyday that you have a city world leader that you know very well is a man of faith first of all, who reads the Holy Scripture at your wedding. It's not everyday that you go into (inaudible) flavor at a press conference that he has called and then he comes to the hospital to see the birth of your first child. It's not everyday that you have someone who is there at the blessing of that child who's named after him. It's not everyday that you have someone who hosts Whitehouse Fellows when the run, coming to New York City and gives them the key to New York. And, it's not everyday that we have the first African American Mayor of the City of New York in our midst. We are in the midst of history here. He was the 106th Mayor for the City, but he is our number one Mayor, the Honorable Mayor David Dinkins, Professor in the Practice of Public Affairs at Columbia University [applause at 0:38:16.8], and our wonderful, wonderful leader who's shoulders we stand on and for who we cheer in honor this day. Let's hear it for the Honorable David Dinkins. [0:38:28.4]

DAVID DINKINS: Well one thing is clear, if I had had the good fortune of having the Reverend introduce me more often I might have gotten re-elected. [laughter at 0:38:48.4] I am delighted to be here, but I want to clear one thing up from the start. I think it should be acknowledged that Faye Rodney has been such a wonderful person and to think that she permits her husband to come along with her the way he does [laughter at 0:39:10.1]. It's really nice. She even lets him think he's in charge every now and then. [laughter at 0:39:16.6] But they are a dynamic duo.

I am delighted to be here with you, I truly am and each year, I guess I've been here ten out of - at least ten times I think - and each year I try to get-myself on the committee that will go and do the, make the decisions on where we are going to go next year so I can visit the islands but they have not yet let me come. But each year though, I insist that the tennis facilities be adequate, but I am not playing this time. But I want you to know my friends (inaudible) that they were out on the court this morning and I will get a report and it better be good. [laughter at 0:40:14.3]

I am delighted to be here with you, I truly am and we are taking a role and those folks who are not here now, but are still having breakfast or are out on the beach, we've got their names; [laughter at 0:40:33.0] and we are going to chastise them severely. But it really is a wonderful, wonderful opportunity to come together with friends. For me personally it gives me an opportunity to say thank you to so many of you who helped me become the 106th Mayor of New York. [0:40:51.2]

We say often that everybody stands on somebody's shoulders, and by that we mean Malcolm X and Martin Luther King and (inaudible) and Harriett Tubman and Rosa Parks and for me, for me personally, it also means Percy Ellis Sutton, [applause at 0:41:13.0] who ran in 1977 with such class and distinction that nobody laughed at me when I dared try in 1989. And we were successful and it is a broad leap. [0:41:33.6]

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Certainly, I was simply privileged to be the stand bearer, but it was many of you here gathered, many of you who worked with me, worked with me in our administration like Laura and Hazel and so many of you, and I know that we wouldn't have gotten nothing done had it not been for the man called the Rumble Genius by the New York Times, Bill Lynch. [0:42:02.3]

Bill used to say, good government is good politics. And you will note on his literature, he's got a consulting firm now and a whole heap of clients and is doing very, very well, you will note that he uses that slogan and it is certainly true. If you do that which is right in the first instance, it will inure to your benefit politically as well. [0:42:34.5]

So we didn't make judgments politically and then say well let's see how that will play out, we did it the other way around. We did what we thought was right and then it inured to our political benefit and I am so proud of so many of the people who helped us succeed as they go forth now. And I can't believe how young they were, some of them are still young even now and maybe it's because I am so old that it looks that way. But it really is an example of what can happen when good people come together and work hard. [0:43:11.7]

And I know that President-elect Obama is going to do well because he is going to surround himself with bright, intelligent, trustworthy people on whom he can rely on. Because no executive, no executive, not even Ed Goldberg, can get it done alone. You've got to have help and you've got to have people to whom you can delegate and you have to have people who will make a triage. You can't look at the thousands upon thousands of things that will come before you. They have to do a triage and bring to you those that they deem to be of significance for you to make a judgment, and then you will make a decision among them. [0:44:00.6]

I am confident that President-elect Obama will make the correct decision once he knows all the options, but he can't know all of the options if they aren't brought to him in the first instance. And the reason that I have such faith that he will be surrounded by good, bright people is the kind of campaign he ran. [applause at 0:44:26.1] He ran one hell of a campaign so it sort of suggests that he will do as well as our President. That is not easily done, particularly in these difficult times, but when Alan Greenspan said, "By God I didn't know it was this bad," or, never (inaudible) how the hell he doesn't know, how am I supposed to know." So it is difficult for sure, but we are going to survive this. They say that that doesn't kill you makes you stronger, so we are going to survive this. [0:45:01.0]

Ed Goldberg made reference to my custom, my habit that I got from African diplomats of instead of acknowledging everyone in the audience, which I would want to do and my staff would go absolutely crazy because I would acknowledge all of my friends and they - I did that once and my wife was standing right next to me and I acknowledged everybody in the house except her. Hell of a ride home [laughter at 0:45:29.6]. But, the African diplomats have this custom, they say, "Usual protocols observed." So, President Jackson that means that you have been acknowledged. [laughter at 0:45:45.2] See, that's the way they do it because if you do otherwise, if I go on to describe how Hazel is my assistant and how - let me tell you, you don't want Hazel against you ever, but by God if she is on your side, nothing can stop you; you will win. [applause at 0:46:12.5] And we are all going to turn out as she leaves us in celebration of NAACP's on it's anniversary it is going to be a

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monster, it's going to be a gas to be right in New York and I hope everyone here comes. It is really going to be something. [0:46:34.5]

I say to audiences, the media in particular has been asking me, "Well what's it like for President-elect Obama the first African American President of the United States?" And their theory is they are asking me because I was the first black Mayor and I try to explain that there is a world of difference. While I got to be the head of a city of 8 million plus people and that's terrific, and we have more separate ethnic identities than the United Nations has member nations, so we are truly a magnificent city, but Obama is not only the President of the United States, he is the leader of the free world. So you really can't make a comparison, you can't. Although, I am sure that he's got to feel wonderful because as he said as his grandmother wasn't there at the very end, but fortunately he got to see her, imagine how the family feels, his wife, his children, so I do understand that part and it is a hell of an accomplishment that he has done, but even he could not have done it without you. And he knows that and that is the beauty of it. [0:48:02.8]

I recognize that those of us who have been privileged to serve, it is a privilege and you have to see it that way and recognize it that way and do the best that you can under the circumstances, but never, ever believe that you got there alone, because that's just not true. I am almost amused, I say almost because I feel a little sorry for the distinguished Governor of Alaska, and it's coming out now how they are swallowing in-house. I don't know whether you have seen the current press and how they talk about the poor lady and she is trying to defend herself and I almost, underline almost, feel sorry for her, but, she made it up there. [0:48:54.1]

So to my friend, Suzan, the Reverend Doctor Suzan Johnson-Cook, you all - many in this audience knows that she took a congregation of about 11 or 12 people, meeting at lunchtime down near City Hall, and built it into a congregation in excess of 1,000. She did that. [applause at 0:49:25.9] She is a very, very special, gifted woman. And I say that she is here with us at this 13th annual meeting, notwithstanding the loss of her dear brother, my friend, our friend, Charles, very recently. A young man who has gone to his reward and she is with us nonetheless and we appreciate it. [0:49:59.4]

Charles was quite a guy. He didn't like to be called Charlie incidentally; he was Charles. It's sort of like if somebody says they know Joe Hines who's name is Charles J. Hines and they'll say, "Oh, I know Charlie" and you know that they don't know him worth a damn because he is Joe Hines. [0:50:24.2]

So, to be here in the company of Carolyn Kilpatrick, the Representative in the Congress who takes care of our brother Charlie Rangel; that is special. That is special. You know one year we had something like 35 members of the Congressional Black Caucus here, I think it was 35, it was over 30 certainly, and that got the attention of a whole lot of people. It got the attention I'm confident of some sponsors who said well next year maybe, we ought to up ours a bit and they did and that's the genius of Faye that she let's Karl come along with her here. [laughter at 0:51:15.3]

It's true that international black heads of states have prevailed in nations with majority black populations, but never before, never, ever in the history of the United States has the Chief of State, the Commander in Chief been other than a white male. And many of us grew up in the days of Jim Crow and dozens of African Americans were still being lynched; 24 in 1933 when I was six years

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old. They were stilly lynching folks and as a matter of fact I can recall some years later as we started to make (we meaning blacks) started to make some progress, we were told things like, "You Negroes (that's what they called us then) you Negroes shouldn't be so pushy, they only lynched five last year." We were supposed to be grateful that so few of us had died. [0:32:15.2]

Then there came World War II; segregation, as we went off to fight and die for our country. And when I got out of the Marine Corps in 1945-1946 and some of my classmates had shrapnel in their bodies, and we could not go to the movies downtown in Washington, D.C., the Nation's Capital, couldn't shop on F Street is you had to try something on, and this is after the war; the war that ended all wars. So we have come a long way since those days, but things are not perfect even now because I maintain that we live in a racist society that is the legacy of slavery, but that does not mean that we have not made great progress. Imagine a black man, President of the United States of America. [applause at 0:53:20.2]

I can remember when there were certain jobs you couldn't even apply for, couldn't even think about it. We got the right to vote by the 15th Amendment in 1870, but we weren't able to exercise that right to vote until 1965 when the Voting Rights Act was passed. As a matter of fact, if you think back on some of the games made during the Civil Rights Days by Dr. King and so many really heroic women and men. And I have to tell you I ain't to sure that I could have followed John Lewis getting beaten down into the ground and he kept coming back, I'm not sure that I could have done that. [0:54:18.7]

I'm not sure that I could have done what the Tuskegee Airmen did. You know about the Tuskegee Airmen, everybody does. they said blacks weren't intelligent enough to learn to fly. And then B.O. Davis who in four years at West Point nobody every spoke to him, they didn't talk to him, and he came through all of that and won the fight for black men to learn to fly and then they said, well you can't go into combat because you will be cowards and turn in the face of the enemy. And then they won that battle and they did it so well that people like Roscoe Brown and Lee Archer and Percy Sutton and so many others, they fly in cover for bombers and never lost a single bomber, not one. [applause 0:55:19.1] So much so that the white bomber pilots would ask for them and I can remember, while I wasn't personally there, the black Marines who were trained in Camp Lejeune in North Carolina, white troops went to Parris Island in South Carolina and they thought that the black Marines were somehow not quite as good as the white Marines, but when the black Marines hit the beach carrying ammo for the guys that were pinned down and running out of bullets, they loved them to death. It's funny what need will do; it's funny. [0:56:16.1]

This election has at last put to rest, I think, any doubt that Americans as a whole oppose the failed economic and social policies of the Bush administration, with its record deficits and recession. Billy Thompson knows about that. Phil used to properly regulate financial industries that led to the loss of retirement pensions and the sub-prime mortgage crisis, outsourcing of American jobs, increased unemployment and refusal to work toward a living wage for job offers, failure to support programs that curtail practices that harm the environment and damage or destroy natural resources, failure to end the war in Iraq and approve any meaningful plan to withdraw troops. [0:57:12.3]

Speaking of Iraq, don't it just get you right here when the Bush people lied to Colin Powell and sent him to the United Nations to tell those lies, and didn't it make you feel good when he came out

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for Obama recently; I mean you know [applause at 0:57:38.5] by God, and he is a guy, you know, he is one of our heroes. He truly is, he truly is. [0:57:52.2]

The American people have spoken across the party lines, social classes and racial divide in support of programs to provide affordable and accessible healthcare, to stimulate economic growth and provide a living wage for American workers, to transform energy consumption and reduce American dependence on foreign oil to improve schools by ending No Child Left Behind, and end the war in Iraq and bring the troops home. Some of you will recall that when the troops came home after Vietnam, our country treated them terribly. They spit at them. They didn't ask to go, but they were treated awful. Korea was a little different. And as Charlie Rangle says, he hasn't seen a bad day since. Charlie was pinned down in a foxhole and came out of there with a Purple Heart and Bronze Star and he hasn't seen a bad day since. [0:58:57.2]

But, even though Americans, whether Democrats, Republicans or Independents, have responded overwhelmingly in support of measure that the new President may be compromised I say, at the outset by the actions of the outgoing administration. Keep in mind that he doesn't take office until January 20th and I'm counting on our friends in the Congress to do whatever they can to see to it that he doesn't start off in a hole, because that is what can happen. It is possible; I hope it doesn't happen. [0:59:41.9]

Earlier this year in February of 2008 I participated in a panel at a meeting of the Independent Newspapers International Advisory Board in Cape Town, South Africa on the topic "End of the Bush Era in the United States." And our discussion, neither prophetic or profound, merely reflected the ground swell for change that has this week resulted in one of the most historic moments in American history; the landslide election of the first African American to the Presidency of the United States of America. [1:00:20.7]

The majority of the American public, irrespective of political party affiliation welcomes the end of the Bush administration, by whatever measure we choose to evaluate its impact, domestic and global, this has been a failed presidency that has brought the United States to the brink of disaster and some say beyond the brink. We could recite the long list of offenses perpetrated or orchestrated by that administration that have passed in the name of foreign policy and global economy. [1:00:57.0]

While the United States has now emerged from unprecedented two-year campaigns, some like the New York Times editorial staff have cautioned that we should pay close attention to the efforts underway to perpetrate the policies of the past seven years with Bush. And at the risk of putting a damper on the celebration of Tuesday's victory, I do feel compelled to call attention to a few of the concerns that lay immediately ahead. [1:01:31.7]

True the Congress has a Democratic majority and the political capital of the sitting administration has been all but spent by the wars in Iraq and Afghanistan, and the worst economy since the Great Depression, but even with the lowest approval rating of any president in the history of our country, he has pressed on to do everything possible within his remaining days to compromise the new president, who will take office with the greatest mandate from the people in a century. [1:02:05.6]

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He has abused the political process more than any of his predecessors, undermining the power of Congress through the use of Signing Statements. Over the last seven years he has issued hundreds of these documents, devices showing us that he had no intention of obeying laws, that he has claimed impinged on the constitutional powers of the Chief Executive. Examples of such Signing Statements are those that authorize domestic surveillance without warrants, torture of prisoners in violation of the Geneva Convention, and firing U.S. Attorneys for political reasons. [1:02:50.5]

Others include a host of executive actions designed to impede congressional programs to expand health insurance and prevent further pollution of the environment. The disastrous Bush Lame Duck Budget proposal announced at his last State of the Union Address contained provisions for permanent tax cuts for the wealthy and the highest level of military spending since World War II and reductions in spending for medical research, environmental protection and education. [1:03:26.9]

President Obama will have to contend with this and a series of other eleventh hour measures. We are confident that Congress will reach across the aisle to combat the resultant stranglehold from President Obama's ability and move forward our country. We have a long way to go in repairing the damage done over the past seven years. And although we deserve to relish the moment of victory, we do understand that we have more battles to fight and miles to go before we sleep. [1:04:00.1]

We should congratulate those other political leaders, some of whom are with us here today in St. Maarten, for their election and reelection victories as well. [applause at 1:04:11.2] And as one of these, the Dean of the New York City Delegation of Democrats, my brother Charlie Rangle. And this is a quote from my brother, Charlie says, "The world we look at is a world of many colors, many cultures, many faiths and what we as Americans have to offer is our experience in creating a diverse society as we show the world all of the diversity that is the strength of America. We reflect our values and present an example to the world. With our nation growing international involvement there could be no better time to attract the best and most diverse (inaudible) to represent the American people in every corner of the globe." so says Charlie Rangle. [1:05:05.3]

When we break for lunch we will hear the distinguished Governor of my home state of New York, the Honorable David A. Paterson. He will talk about the importance of building upon the partnerships necessary to translate the watershed victory of democracy in the United States into lasting change. I can't resist remind us that the governor's father, Basil Paterson, once won 61 out of 62 counties in New York State in a Democratic Primary for Lieutenant Governor. And then he joined the of (inaudible) of Goldberg. He was a former United States Secretary of Labor, former United States Supreme Court Justice, former United States United Nations Ambassador, the lousiest damn candidate you ever saw. So Basil did not win, but he would have become the first black Lieutenant Governor of New York State and eyes on the first black governor. So imagine, as I sat in the front row at the state committee meeting and Basil placed David's name in nomination for Lieutenant Governor. I had tears in my eyes. It had come full circle and now that same David is Governor of the State of New York and you will hear from him later. [applause at 1:06:41.3]

Later this afternoon we will meet to share our thoughts and plans for sharing working solutions to education. There are challenges as business and political leaders will be to craft strategies for keeping the doors of the international education open to our future leaders. The world will be a

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dimmer place if we let the lamp of knowledge go out for a generation of our young people. It is within our power to turn up the flame and keep it burning bright, and in the words of President-elect Barack Obama, "Yes we can." [applause at 1:07:24.8]

REV. DR. SUZAN JOHNSON-COOK: Thank you Mr. Mayor, and thank you for looking so wonderful. He's dapper, Amen! Doesn't he look good? [laughter and applause at 1:07:42.4] And Barack Obama stands on your shoulders because you took the blows that shows what a man of faith could do and we thank you for representing us well. [1:07:52.3]

We also are joined by many a (inaudible) joints throughout this conference by many elected officials and some are here this morning; elected officials from the State of New York. You will hear later from the Honorable David Paterson, you heard from our City Controller Honorable William C. Thompson, Jr., Honorable Adolfo Carrion, Jr., President of the Borough of the Bronx; Honorable Nick Perry the Assemblyman for New York State, The Honorable Ruth Hassle-Thompson, State Senator New York State, the Honorable Keith Wright is with us this morning, Assemblyman for the New York State the Honorable Inez Dickens, Council Whip, Member of the New York City Council, and Honorable Dr. Kendall Stewart, Member of the New York City Council. Can we applaud for all of the elected officials from the State of New York? [applause at 1:08:34.3]

And then members of Congress who will be joining us throughout, some of whom you heard last night and today, the Honorable Donald Payne, the Chair of the Subcommittee on Western Hemisphere, the Honorable Bennie Thompson, Chair of Homeland Security, Honorable Donna Christensen, the Honorable Chair of the Subcommittee on National Resources, Honorable Sheila Jackson Lee and now we are also going to hear from one of our Presidents of the Congressional Black Caucus, the Honorable Carolyn Cheeks-Kilpatrick. We are going to the federal level y'all [applause at 1:09:09.6] who is our President, Madam President and will be working with Mr. President would you please come and let us receive her this morning for what a wonderful job you have done and you have served with distinction as well and we celebrate and salute you this morning. Can we applaud the other members of the Congress who are with us? [applause at 1:09:29.1]

REP. CAROLYN CHEEKS-KILPATRICK: Giving honor to God who is the head of my life, present protocol being established [laughter at 1:09:46.3], but I've got to say a couple even given that. To Faye and Karl, its really thoroughly been said but thank you from the bottom of all of our hearts. We could not do this without you. Thank you very, very much. [applause 1:10:00.4] We could (inaudible) every week in our Washington offices, but that's how we keep up with the Caribbean if not for the newspaper, there would be no association that we could actually see and know what is going on and how we (inaudible) so thank you very much from the bottom of our heart. Thank you very much. [applause at 1:10:18.6] Commissioner Wescot-Williams as well as all the commissioners over here. St. Maarten, one more time, thank you for hosting us one more time, we love you, thank you very much. [1:10:29.4]

Our key ingredients for the Congressional Black Caucus where I Chair 43 members, we come from 21 states, we present over 40 million Americans; [applause at 1:10:40.8] five full Committee Chairs, 17 Subcommittee Chairs and others like the Majority Whip and Jim Clyburne from South

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Carolina and others who help to control the Congress. We have the first African doctor in the house, a member of our Caucus who chairs our health branches and very instrumental in us being here, why don't you welcome my sister. Dr. Congresswoman Donna Christensen. [applause 1:11:11.7] Thank you, we love you.

It was mentioned earlier that, and I'm going to say who else is here, you heard from Dr. Payne and I know if he is here in this room you will hear from him again, you did last night, who chairs our Western Hemisphere Committee. Bennie Thompson who is here and I think he came through last night, he chairs our Homeland Security Committee also will be here. Sheila Jackson Lee from Houston, Texas and I know many of you know her, she is en route and will be here just shortly. Our number uno Congressman, second only to John Conyers in seniority, from the great state of New York, Chairman of the House Ways and Means Committee, our big brother Charlie Rangle will be here this afternoon. [applause at 1:11:55.3]

And what you probably don't know is the federal budget is \$3 trillion dollars. Charlie's committee handles \$2 trillion of that for Medicare, Medicaid, for veterans programs; his committee is the committee that produces the revenue, \$2 trillion of it, giving it out in what we call entitlements to those programs. I served on Appropriations where the committee spends the money, and I like that too. We spend a million and Charlie generates it and gives it all by formula to the entire committee and our committee handles the appropriations in sending it out. [1:12:33.0]

Together we make up the Congressional Black Caucus and it was said earlier, many more members will be coming and will have come over the years, but I just wanted to say a point of personal privilege, this last six months, the last two months and the last two weeks, members of the Congressional Black Caucus have been crisscrossing America for our now President, Senator Barack Obama. [applause at 1:13:00.1] Even as we had our own elections [applause 1:13:02.4] Tuesday we were all on the ballot as well but (inaudible) just thinking as it relates to it's is major, but most of us went to many states all over this country. [1:13:12.4]

You see 18 of our members represent less than 50% of the African Americans; three of our members represent less than 15% African Americans, the most that any of us represent is a 62% African American so we represent all of America, Asians, Africans, Latinos, Europeans, Native Americans, you name it and we are called the conscious of the Congress and we really are that you know. [1:13:38.5]

God built us from a certain kind of way and we got some of this stuff in us that you do, you cross ethnic lines and it makes us stand up for righteousness, speak up on injustices and when we see something wrong you have to hear it because, of course, we are the conscious of the Congress. So in the spirit of (inaudible) is that Congresswoman Christensen talks about healthcare it's real. They have more because we have less. [1:14:03.2]

We hope and we know that with President Obama yes we had some difficult times in the Mayor laid them out well. And to the sponsors by the way, all of you, we couldn't do this, be with you, help Karl if you weren't here with us so we say thank you very much, you are so important. To all of the sponsors, thank you very much. [applause at 1:14:23.9]

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So as we move to these next four years, two months, 32 days - talk about the short period between November 5th and August 20th, [sic] President Bush is still the President. Our Constitution says that if there is unrest or malice or whatever, the sitting President can hold off and not let happen the January 20th date. There isn't many people that know about that, so we don't want any - we were kind of scared about November 4th when we won. We wanted everybody to be prayerful, be (inaudible) and have fun and all that, don't burn [1:15:00.5]

END PART 2

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TRANSCRIPT OF AUDIO FILE:

11-7AMSESSION - LAST 20 MIN

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BEGIN PART 3:

REV. DR. SUZAN JOHNSON COOK: Thank you, Mr. Mayor. Thank you for looking so wonderful. He's dapper. Amen. Doesn't he look good? (clapping). Barack stands on your shoulders because you took the blows and showed what a man of faith could do and we thank you for representing us well.

We also are joined by many and will be joined throughout this conference by many elected officials. Some are here this morning; elected officials from the State of New York. You will hear later from the Honorable David Patterson. You've heard from our city controller, William C. Thompson, Jr., Honorable Adolpho Carrion, Jr., President of the Burroughs of the Bronx. Honorable Nick Hardy, the assemblyman from New York State, the Honorable Ruth Hassell Thompson, State Senator of New York State, the Honorable Keith Wright is with us this morning, assemblyman from New York State, the Honorable Inez Dickens, council whip member of the New York City Council, and Honorable Dr. Kendall Stuart, member of the New York City Council. Can we applaud for all of the elected officials of the State of New York? (clapping).

Members of Congress who will be joining us throughout. Some of whom you have heard from them last night and today, the Honorable Donald Payne, Chair of Subcommittee on Western Hemisphere, the Honorable Bennie Thompson, Chair of Homeland Security, Honorable Donna Christensen, the Honorable Chair of Subcommittee on National Resources, Honorable Sheila Jackson-Lee, and now we hope to also hear from one of our presidents of the Congressional Black Caucus, the Honorable Carolyn Cheeks-Kilpatrick. We're going to the federal level you all; who is our (inaudible) president. We're only working with Mr. President. Will you please come and let us receive her this morning for what a wonderful job you have done and you have served with distinction as well, and we celebrate and salute you this morning. Can we applaud the other members of Congress (inaudible) (clapping).

REP. CAROLYN CHEEKS-KILPATRICK: Giving honor to God who's the head of my life, present protocol being established, but I've got to say in comfort even given that. To Fay and Karl, really (inaudible) really from the bottom of all of our hearts, I cannot be this without you. Thank

you very much. We could (inaudible) ever week in our Washington offices and that's how we keep up with the Caribbean. If not for the newspaper, there would be no association that we could actually see and know what's going on and how we plug in. So thank you very much from the bottom of my heart. Thank you very much.

Commissioner Wescott-Williams, as well as all commissioner's who are here, St. Maarten, one more time. Thanks for hosting us. We love you. Thank you very much.

I bring you greetings from the Congressional Black Caucus, where I chair 43 members. We come from 21 states. We represent over 40 million Americans, 5 full mini chairs, 17 subcommittee chairs, and others like the majority whip and Jim Clyburn from South Carolina, and others who helped to control the Congress. We have the first African doctor in the house, a member of our caucus, who chairs our health brain trust and very instrumental in being here. As being here, won't you welcome my sister back, your Congresswoman Donna Christensen? Thank you, Donna. We love you.

It was mentioned earlier that, I'm going to say who else is here, you heard from Donald Payne, and I know if he's hear in this room, you will hear from him again. You did last night. He chairs our Western Hemisphere Committee. Bennie Thompson, who's here, and I think he came through last night, he chairs our Homeland Security Committee. Also will be here. Sheila Jackson-Lee from Houston, Texas. I know many of you know her. En route, she will be here just shortly. Our number one congressman, second only to John Conyers in seniority, from the great State of New York, Chairman of the House Ways and Means Committee, our big brother. Charlie Rangel, will be here this afternoon.

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As it was said earlier, many more members will be coming and have come over the years, but I just wanted to say, a point of personal privilege. This last 6 months, the last 2 months, and the last 2 weeks, Members of the Congressional Black Caucus have been criss-crossing America for our now president, Senator Barack Obama. Even as we had our own election, Tuesday, August 4th, we were all on the ballot as well, but ours wasn't as significant as relates to us as major, but most of us went to many states all over this country. You see, 18 of our members represent less than 50% African-American. Three of our members represent less than 15% African-American. The most that any of us represent is 62% African-American. So we represent all of America; Asians, Africans, Latinos, Europeans, Native Americans. You name it.

We're called the Conscience of the Congress and we really are that. You know, God built us in a certain kind of way. We got some of this stuff in us, as you do with you. Across ethnic lines, it makes us stand up for righteousness, speak up on injustices, and when we see something wrong,

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you have to hear it because, of course, we're the Conscience of the Congress. So the disparities that Donna, Congresswoman Christensen, talks about in health care, it's real. They have more because we have less. We hope and we know that with President Obama, yes we have some difficult times and the Mayor laid them out well. And to the sponsors by the way, all of you all. We couldn't do this, be with you, help Karl if you weren't here with us. We say, "thank you very much. You are so important". All the sponsors. Thank you very much.

So as we move through these next 4 years, 2 months, 32 days, talk about the short period between November 5th and August 20th. President Bush is still the president. Our constitution says that if there is unrest or malice or whatever, the sitting president can hold off and not let happen the 20th day. There are few people that know about that. So we don't want any, we were kind of scared about November 4th when we won. We wanted everybody to do prayer. There will be a tone-in and have fun, and all that. Don't burn nothing down. Don't burn up a car and all that because they're waiting. Some people are waiting. Some people are very angry. We are euphoric. God is euphoric and people across ethnic lines, you saw them. The multi-cultural facets of America happy because it was a perfect storm. Financial markets crashing. People losing jobs. Health care unaffordable. Our schools in shambles. Big bad America and we still are; it's just this 8 years we have a man in the White House who knew not Joseph. In his leadership of our country, he not only decimated America, but caused havoc around the world. I know you know that.

So we've got a lot of building to do. What Karl and Fay has done is to energize each of us so we take our rightful places. All of you and all of us together. I'm going to bring into this room 2 of my sisters who we lost over the last year. Congresswoman Stephanie Stubb-Jones, Cleveland, Ohio, will be right here. Right over here, smiling and said 'Let's do this'. I want you to give a shout-out for Stephanie. She's up in here right now. Congresswoman Juanita Milligram-McDonald from Los Angeles, also with the ancestors are up in here right now. Both chair people I might add. Congresswoman Stephanie Stubb-Jones (sp) of our Ethics Committee and Congresswoman Juanita (inaudible) McDonald of our House Administration Committee. Finally, all during this tenure, 2 years is what Congress is, this is the 110th congress. So many historical things have happened that I mentioned to you already, including electing our first African-American president. Then finally Julia Carson from Indianapolis, Indiana, also (inaudible) has been to this conference many many times.

So my brothers and sisters across racial, ethnic gender, geographic, biological, (inaudible) we have much work to do, but it can be done. Because I believe there is a higher power who's directing all of this. We just have to know it and believe it, and do it, and be centered in a higher power.

So as members of the Congressional Black Caucus, as we go back next week to address the financial crisis. You all have been hearing about this \$700 billion, every time I say it, we handle a trillion, our committee. \$700 billion is what we just gave out or given out as we speak. The good thing about that, they were trying to give it all out. \$300 billion of it is gone, but the good news, the new president, anything they put in force, he can pull it back. So we have an opportunity to do some real comprehensive stuff.

The housing market? No more foreclosures. Those same people who got the \$700 billion, they were the ones who caused 80%, 85% of the foreclosing. Do you all know that? Predatory lending.

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Loss of jobs. Shifting our jobs over seas. You see, when the financial people do their thing, (inaudible) a billion here and here. It's paper. It's two clicks of the mouse. They were selling bad paper then and they were making big money. My sister, Susan. Let's give Susan a hand. Essence Magazine. Love you girl. (inaudible). We have to be smarter and better as we go forward. Senator Barak Obama, and you may have heard about his prudent campaign. Most of us in this room a 1-1/2 or 2 years, we thought it couldn't done, because we lived with the same people who had to do it. But the perfect storm. Don't forget that. The perfect storm caused by humans. Greedy humans in many cases.

I do a lot of work in the Middle East; Egypt, as well as Lebanon. I do (inaudible) and they're great people, but this president castigated Arabs. In Michigan, where I come from, and John Conyers, we have the largest population of Arabs outside of the Middle East. They've been in our community for decades. They go to our schools. Our children know them. They help and help to build the community. Yes, there are a few bad ones who blew up some (inaudible). God took care of them. They're going to be taking care of. But just like we don't want everybody to measure African-American by a few who do bad things, there are good things in all people. I believe that as President Obama comes into fruition, a member of the Congressional Black Caucus, his job, and he really does believe this, is to bring the races of God's people together. Whether you know God as God, or Allah, or Jehovah, or what have you, that if you really believed in a higher power, let's get busy and rebuild the world.

So, my brothers and sisters, we got a lot of work to do and you do as we go back to New York. Keep the (inaudible) operating. Keep your will strong and knowing that, as president takes his oath and pray that nothing happens between November 5th and January 20th. He can call marshal law. He can go around the country and lock up heathens and Christians, which isn't going to happen. Lock up anybody who might be subversive or such. Create an environment so that January 20th may not ever happen. That's the nightmare. Now snap back. Wake up. He won. It's going to be all right. Let's build a new America again. Let's make sure that our children can have adequate education because it's no longer Michigan against Indiana or Ohio, Michigan against China. It's US against the world and we can build those partnerships the way we do with Faye and Karl, and all of us who have been working for all of these years.

Thirteen is a significant number in the Bible. Thirteen is a number that renews us, gets us ready for the next state of our development. So as we meet here in beautiful St. Maarten, let us rededicate ourselves to a higher power to each other, to knowing that we can do anything but fail. God bless you. (clapping).

REV. DR. SUZAN JOHNSON COOK: Now that's a sister who's got it going on. Thank you so, so much, Congresswoman, Madam President of the Congressional Black Caucus. We can see why. Amen. We are looking forward to great things ahead and you have us as the wind beneath your wings. All of you Congressional Black Caucus members, we are with you so much. Let the church say, "Amen".

We just want to share with you before we present our next speaker. This evening, our host country is going to present us with a fantastic affair. It's going to be offsite and we hope you won't miss it. Transportation is going to be coordinated and we are going to ask that you meet in the lobby at 6:15

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tonight. The transportation will be coordinated by our local government. It's a casual event. It's a beach site affair tonight and we're asking all conference attendees to gather at 6:15 sharp in the lobby for departure. So that's our night affair tonight and we will repeat that announcement throughout the day. If you will just please make note of that as we go forward.

We've heard from the city level. We have heard from the federal government. You know, we are so excited about our first African-American president and many of us also wanted a woman in and it was not a woman's time. It was time for Barak Obama, but in this country, it is a woman's time. As the commissioner who is the leader of government for St. Maarten. Come on somebody. It is Commissioner Sarah Westcot-Williams, our host. She has been gracious. She is elegant. She is eloquent and we are excited about being received by her today. Commissioner Sarah Westcot-Williams. (clapping)

COMMISSONER SARAH WESTCOT-WILLIAMS: Thank you reverends and a very good morning. There's another way to deal with the selfish (sp) protocol and that is by saying, "Welcome friends to St. Maartens". I can say this notwithstanding the many luminaries in our midst because it is truly a welcome to old friends and new acquaintances.

This conference, at this time, on this island, would not have been possible if it was not for the resoluteness and conviction of Mr. and Mrs. Rodney. It was 6 years ago that many of you were here on St. Maarten for the conference as well. It is with a lot of confidence that last year, I threw out the idea of why not again St. Maarten., has been at that time five years ago. This year, it is six years ago. It was only after throwing it up as we sat down to plan, I realized that this conference would have been held two days following the most important election in modern times of the United States of America. As we, Commissioner Malven (sp) and myself visited Karl and Fay in New York, I said to him, "Karl, as much as I want this conference on St. Maarten, I don't know if the timing is right." He said without being presumptuous about the outcome of the election, he said, "Oh no. I believe the timing is right". And with a glee in his eyes, I suspected that he was counting on a victory and a big one, and felt that St. Maarten would be a place where we could celebrate that victory.

This small island of ours, and I'm aware of the clock just in case I was to get any sign from the back. but this small island of ours, only 37 square miles and that is both sides of the island, tonight you probably would understand. You will get to know how we share the island, but I can tell you that St. Maarten is the smallest side of the two. Nevertheless, we accommodate close to two million tourists annually on this island. Approximately 1.3 million visit our island by cruise and the others come here to stay over with us, relax and enjoy our island. And yes it is so opportune and truly a region in transition.

Throughout this region, every island, every island nation, every country, is going through some sort of transition. For St. Maarten itself, we are going through a major constitutional transition. Moving from what others term as called an island territory, a remnant of a colonial system, to that of country within the kingdom of the Netherlands. The French side, just last year, moved from a French municipality to what is called in their terms, "a collectivity". So yes, this region is truly in transition and change is all around us. This side is so important for the relationships between the

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United States of America and the Caribbean region. I am again so thrilled to hear so many of you speak of kinship, relationships, and ancestry as you recognize this region for what it is.

Term water (sp)? Yes. Maybe, but definitely a part of the United States of America. However you take it or twist it. The Diaspora of the West Indies and the United States of America. It's big. It is great and we need to continue to recognize that forging those relationships strengthen it year after year through this conference call is extremely important. As if it wasn't enough to realize that we were going to start a conference two days after such an important election, just barely three weeks ago, St. Maarten was brushed by Hurricane Omar, a category 3 hurricane. So if you were around and you noticed that the scenery is not exactly what you expected of it, if you feel a little in the roads as you go from place to place, recognize that that is what had happened. But Karl decided the conference was going to go on and the conference will go on, Karl, right here in St. Maarten.

So tonight it is my pleasure to host you at another side of the island because you are here two days after the election, two days after a historic election, and yes, notwithstanding the turmoil and the challenges, President Barak Obama is going to face, the party too will continue and the party on St. Maarten will continue this evening on the other side of the island hosted by the Government of St. Maarten. I encourage you and those who are part of the latest workshop this afternoon, to do it well, right, and try to get out as soon as possible so that we can move from here in a timely fashion and the police escort will only be something to show you how proud we are of having all of you here. But we will get to the other side of the island nicely, on time. A region in transition. Thank you for being here at this time in your history and in our history.

I welcome all of you and it is wonderful to be able to open this conference in a time like this because it is for such a time that you are here and we are here, and it is such a time that President Barak Obama was chosen to lead the United States of America and, with that leadership, to be the leader of the free world. If, just if, approximately 40,000 more persons voted could have given him even more votes, he would have had those from right here on St. Maarten, the friendly island of the early (inaudible). So today, we too rejoice with you and we too are hopeful that the change that is coming will be a good one for all of us. We just hope that some of that invigoration and renewed energy that we all will get from this conference will serve you well, when you go back and will serve us well as we continue to build our island nations from strength to strength and with God, all things are possible. Have we not seen that on November 4, 2008. What a wonderful way to celebrate and, Karl, what a wonderful thing to happen (inaudible) St. Maarten and deciding the conference welcomes the 13th Annual Multi-National Caribbean Business Conference. Thank you. Welcome. Enjoy it and may God continue to bless you richly. Thank you.

The question was how casual can you be tonight? You be as casual as you feel comfortable on an island that is your host. So men, absolutely no jacket and ties. I would not recommend that, but be as casual as you've been comfortable. Thank you.

REV. DR. SUZAN JOHNSON COOK: All right. This is where we break. Hold on. We have (inaudible) ceremony. If you will just wait for us please. We're going to invite all of the sponsors and the elective officials to please join the Rodneys as our host today. here up front for our ribbon cutting ceremony. All of our sponsors, all of our elected officials that are present, please come and

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join us up front. Those who are our speakers this morning, please right here in the front of the stage, and we will be lead. All rise. (singing)

END TRANSCRIPT

09-3698 0062

Exhibit 4

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re: Representative of Citi
Review #: 09-2567; 09-4403; 09-3698; 09-6333; 09-2222
Date: March 17, 2009
Location: AkinGump NYC - 399 Park Ave, New York, NY
Time: approximately 2:00 to 4:00 p.m.
Participants: Leo Wise
Omar Ashmawy

Summary: The Representative of Citi was the Citi employee who managed their donation to the Thirteenth Annual Multinational Business Conference. The OCE requested an interview with the Representative of Citi and he consented. The Representative of Citi made the following statements in response to questioning:

1. The Representative of Citi was given an 18 U.S.C. § 1001 warning and consented to an interview. The Representative of Citi signed a written acknowledgement of the warning [attached].
2. The Representative of Citi was laid off from Citibank on December 15, 2008. At the time he was laid off he was Community Relations Officer for Brooklyn and Staten Island
3. The Representative of Citi joined Citi in December 2003. He had previously worked for Chase in a similar capacity. Chase sponsored previous Caribbean Multinational Business Conferences. The Representative of Citi attended the conference when he was at Chase. Chase was the first financial institution to act as a sponsor at the conference.
4. When he came to Citi, he was told to "lead the charge" in terms of Citi's participation in the conference. His superiors made the decision that Citi should participate.

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

5. The Representative of Citi's direct supervisor was Eileen Aulden, New York State Director; she reported to Kathy Ebanks, Regional Director. Eric Eve, Senior Vice President for Community Relations headed the Representative of Citi's department. Mr. Eve made the decision to support the conference and decided on the dollar amount. The Representative of Citi was in charge of managing Citi's participation.
6. Citi donated \$75,000 to support the conference. Citi was the only "senior" sponsor. The money was specifically for the conference. Citi did not put any specific restrictions on how the money could be used to support the conference. The check came from Citi's sponsorship budget and was either made out to the Carib News or the Carib News Foundation.
7. In previous years the amount Citi donated was less. In 2007 it was \$50,000.
8. Karl Rodney chose the location of the conference. Governments in the region made bids to host the conference.
9. The only person from the conference that the Representative of Citi dealt with was Rodney. The Representative of Citi met with Rodney on 5 occasions between May and November 2008. These meetings concerned the program at the conference and Citi's participation in it. These meetings were not about the amount of Citi's sponsorship or to negotiate that in any way. The Representative of Citi described this interaction as a "dialogue" with Rodney. Rodney was receptive to suggestions about the program.
10. At these meetings the Representative of Citi would tell Rodney how he would like to "position" Citi at the conference. Citi participated in the luncheon, with Eve as a keynote speaker, and in workshops that fit their business. The lunch topic was set by Rodney. The Representative of Citi then tried to "position" Eve in a complimentary way. The Representative of Citi recalls suggesting to Rodney that Citi could do a workshop on financial education.
11. Rodney did not present a written agenda for the conference before any of their 5 meetings. The first time the Representative of Citi saw a written agenda was a week or a week and a half before the conference began in early November. The Representative of Citi recalls seeing a draft agenda. He was shown the draft agenda submitted to the Committee on Standards of Official Conduct [attached as Exhibit B] and said he saw some version of the draft agenda but not this specific one. He did recall seeing the panel entitled, "Creative Financial Solutions" on page 9 of Exhibit B. He said when he saw

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

- that panel he thought he could participate in the panel and talk about foreclosures. He "vetted" that topic internally at Citi and then proposed it to Rodney and Rodney agreed.
12. The Representative of Citi attended the dinner on Thursday night. He does not recall Congressman Payne speaking.
 13. The Representative of Citi participated in the ribbon cutting with members of Congress, host government officials and major sponsors on the Friday morning of the conference. The Representative of Citi got sick on Friday and missed the evening event.
 14. Eve did not have a sit-down meeting with the members of Congress in attendance to the Representative of Citi's knowledge.
 15. The Representative of Citi did not have more than "cursory" conversations with the Members of Congress who attended. He saw all members that attended more than once. He saw most of them on Friday and had seen everyone by Saturday.
 - a. The Representative of Citi recalled Congressman Rangel was there. The Representative of Citi thought he first saw him on Friday and saw him on Saturday. The Representative of Citi thought he saw him at different events.
 - b. The Representative of Citi saw Congressman Payne on more than one occasion.
 - c. The Representative of Citi saw Representative Kilpatrick early on Friday. He does not recall her speaking.
 - d. The Representative of Citi saw Representative Thomson on Thursday; he saw him on more than one occasion.
 16. 300 to 350 people typically attended the event. It was open to anyone.
 17. The conference was billed as the Carib News conference. Rodney is the publisher and CEO of the Carib News. In May or June one would start seeing advertisements for the conference on the back page of the Carib News. The Representative of Citi thought Citi's check went to the Carib News Foundation but did not know what the Foundation did other than the conference. The Representative of Citi thought the conference was "totally" financed by the sponsors. He did not know if Carib News put up any money for the conference.

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18. The Representative of Citi said Rodney saw the conference as an opportunity to position the Carib News as the "voice of the Caribbean" which is how the paper markets itself in New York.
19. Citi saw the conference as offering Citi three benefits: (1) it sent a message to their partners; (2) it was a business opportunity; and (3) it was good for Citi's image.
20. The members of Congress lent the meeting "clout."
21. Sponsors also bought ad space in the Carib News. This was not part of their sponsorship of the conference. Citi bought ad space in the Carib News.
22. The Representative of Citi also knows Rodney from the Board of the University of the West Indies. Both he and Rodney are members and participate in telephone meetings and, occasionally, in in-person meetings.

We certify that this memorandum contains all pertinent matter discussed with the Representative of Citi on March 17, 2009.

Leo J. Wise
Staff Director & Chief Counsel

Omar Ashmawy
Investigative Counsel

OFFICE OF CONGRESSIONAL ETHICS
U.S. HOUSE OF REPRESENTATIVES

18 U.S.C. § 1001 ACKNOWLEDGEMENT

I have been provided with a copy of the text of section 1001 of title 18, United States Code (popularly known as the false Statements Act) and hereby acknowledge that it applies to any testimony or documents I provide to the Office of Congressional Ethics.

Name:  _____

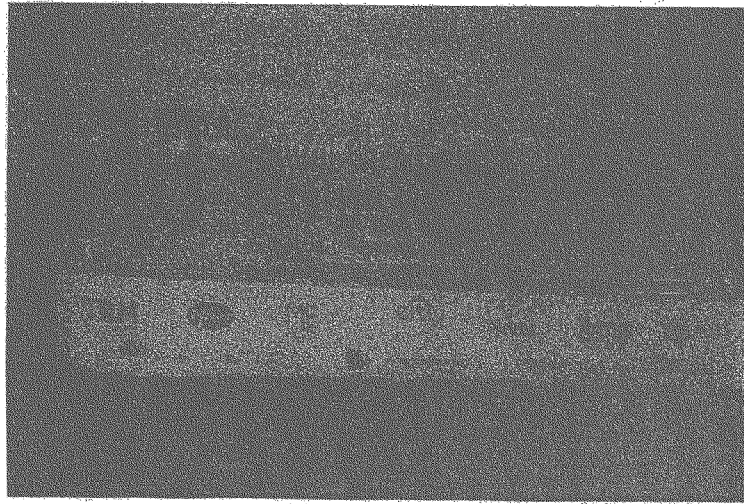
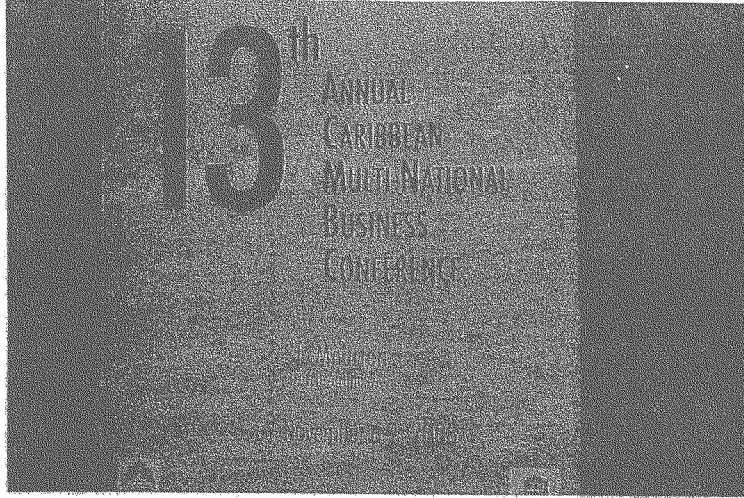
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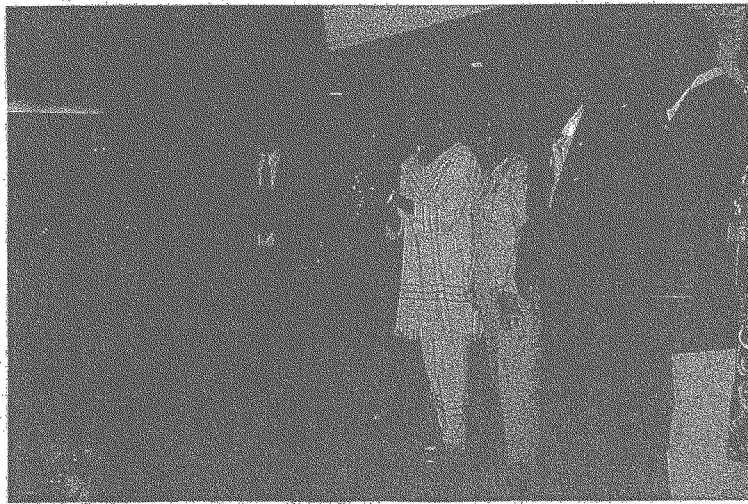
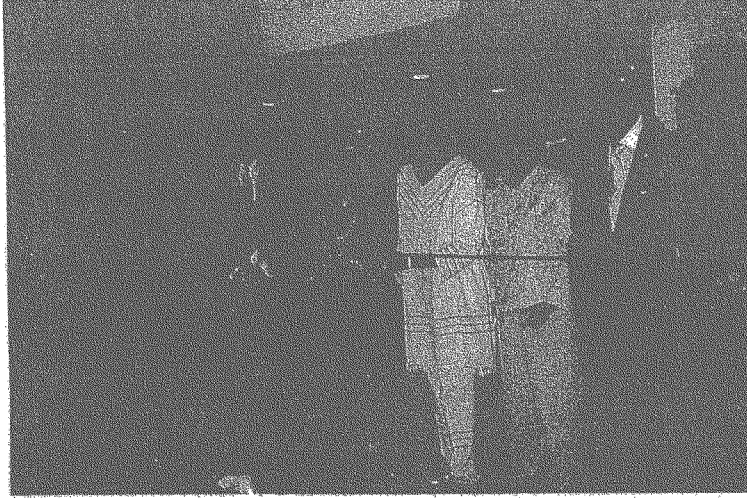
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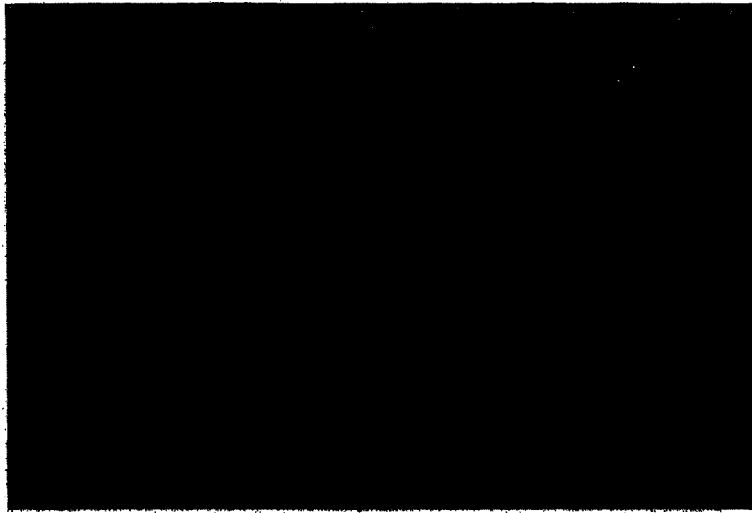
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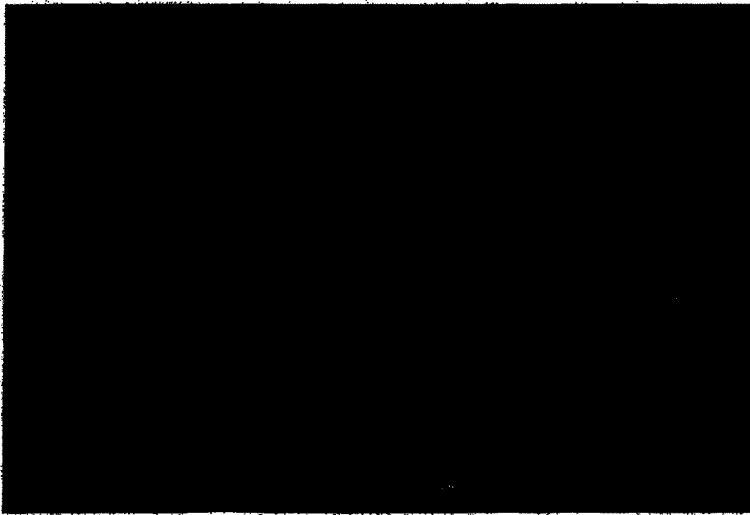
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Exhibit 5

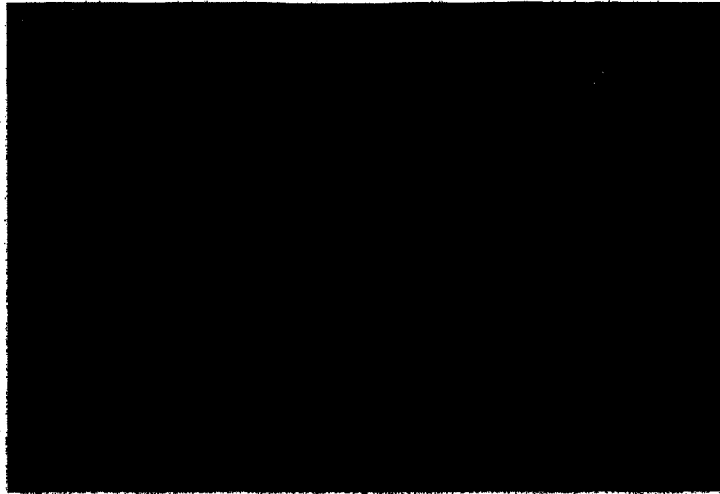




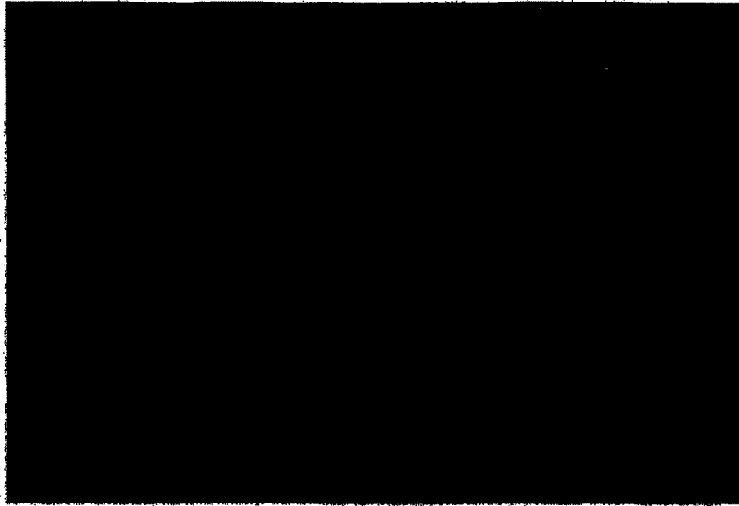












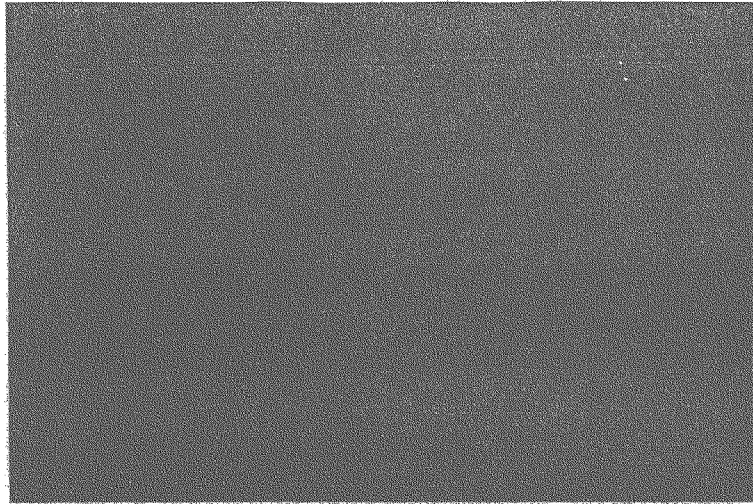


Exhibit 6

STROOCK

JOEL COHEN
DIRECT DIAL: 212-806-5644
DIRECT FAX: 212-806-2644
JCOHEN@STROOCK.COM

DANIELLE ALFONZO WALSMAN
DIRECT DIAL: 212-806-5607
DIRECT FAX: 212-806-2607
DWALSMAN@STROOCK.COM

May 18, 2009

BY EMAIL AND REGULAR MAIL

Mr. Leo Wise
Staff Director & Chief Counsel
Office of Congressional Ethics
United States House of Representatives
1017 Longworth House Office Building
Washington, DC 20515

Re: Request for Information, Review No. 09-2567

Dear Mr. Wise:

In response to your request for our clients' voluntary cooperation regarding your office's questions pertaining to the Thirteenth Annual Caribbean Multi-National Business Conference (the "Conference"), we submit the following responses. Based upon our review of the questions and our multiple conversations with your office, we believe that these responses contain the information that you are seeking. As with our previous production, to the extent that the Freedom of Information Act is applicable to any submissions made to the Office of Congressional Ethics, our clients hereby request that the information provided be treated confidentially.

The Host country participated in the Conference as follows: (1) developed local Host Committees to facilitate local planning, (2) helped to negotiate the rate with the hotel, (3) assisted in developing the theme of the Conference, (4) assisted in identifying local speakers, including the Leader of Government, (5) assisted in local publicity, (6) provided local entertainment, including a school choir and cultural items, (7) arranged Host Country Evening on Friday, November 8 (the group was transported to another property for refreshments and entertainment), (8) helped with local transportation for some Carib News employees and helped arrange accommodations for some guests (not paying for such accommodations), (9) participated

09-3698 0080

Leo Wise, Esq.
May 18, 2009
Page 2

as event Speakers, and (10) issued invitations to attend to specially invited guests. The Host Country provided no funds towards the cost of the Conference.

The cost for members of the public to attend the conference for the four days and three nights was \$840.00 for double occupancy or \$1085.00 for single occupancy. The cost of attendance covered room accommodations, meals, and admission to the Conference presentations.

The attending Members of Congress participated in sessions relevant to their Committee assignments in Congress and demonstrated interest in a particular subject matter. For example, Congressman Bennie Thompson spoke at presentations on Hemispheric Security and Immigration/ Deportees, Congresswoman Donna Christensen spoke at a Town Hall Forum on Health, and Congressman Charles Rangel spoke at presentations on Haiti and the Caribbean, and the current crises facing them. In addition, all of the Members of Congress participated in a session with the local Ministers of Government to discuss issues of interest to the Caribbean region. Though correspondence with the Members of Congress indicated that a memo of the Closed Door Session would be distributed after the Conference, no such memo was ever drafted or distributed.

The total cost of the Conference approached \$300,000. These costs included direct expenses such as travel, event planner fees, local staffing, and hotel payments, as well as Carib News operating expenses for the purpose of the preparation and implementation of the Conference. The Conference costs were paid using (1) registration fees by the attending guests, (2) contributions from corporate participants, some to Carib News and others to Carib News Foundation, and (3) general funds of Carib News. Each of three sources of funding was pooled together to pay the various expenses.

If you have any questions regarding this information, please do not hesitate to call.

Very truly yours,



Joel Cohen

and



Danielle Alfonzo Waisman

09-3698 0081

Exhibit 7

AKIN GUMP
STRAUSS HAUER & FELD
Attorneys at Law

STEVEN R. ROSS
202.887.4343/fax: 202.887.4288
sross@akingump.com

March 31, 2009

Mr. Leo J. Wise
Staff Director and Chief Counsel
Office of Congressional Ethics
1017 Longworth Building
Washington D.C. 20515

Re: Citigroup, Inc. Production

Dear Leo:

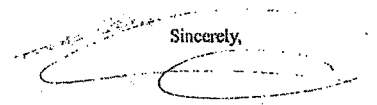
On behalf of our client, Citigroup Inc., we are providing you with two documents in response to your oral request of March 17, 2009. Please find a copy of a solicitation letter to support the 2008 Caribbean Multi-National Business Conference, dated April 4, 2008, from Carib News Foundation to our client. In addition, please find a copy of both the front and back of check number 5006611264, dated June 13, 2008, payable to Carib News Inc. in the amount of \$75,000.00. A search of our client's records has not uncovered any evidence of a receipt being provided for the above-mentioned check. We will produce this document should it be identified.

The documents we are producing today are confidential and proprietary in nature, and have been marked accordingly. We ask that these documents be kept confidential by your Office and your staff. Notwithstanding our request that these documents be kept confidential, due to their sensitivity, we ask that your office or staff provide us with notice and an opportunity to be heard before disclosure of any information from these documents to any third parties.

In addition, we are providing you with an original signed document of Michael Flanigan dated March 23, 2009, acknowledging the False Statements Act.

Please let me know if you have any questions.

Sincerely,



Steven R. Ross

09-3698 0083



Citi Check Image Delivery

- Print
- Close Window
- Check Image Inquiry Results

Account #	Check #	Amount	Paid Date
00000038851877	5006611264	\$75,000.00	06/24/2008

<p>CITIGROUP CITICORP FINANCIAL SERVICES GROUP</p>	<p>02-20 311</p>	<p>No. 000001200 Date: 13-JUN-2008 Vendor No. 206613</p>
	<p>CARIB RICH INC 15017 1633 07 052308 CHARGE 7 WEST 30TH STREET 8TH FLOOR NEW YORK NY 10018</p>	

75 TO THE
OWNER OF

SEVENTY-FIVE THOUSAND AND 00/100 DOLLARS

NOT VALID AFTER 180 DAYS

Andrew Hamilton

⑆5006611264⑆ ⑆031600209⑆ 3885387⑆ ⑆000750000⑆



Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10018
Tel: (212) 944-1991; Fax: (212) 944-2089
E-mail: info@caribnewsconference.com

April 04, 2008

Mr. Eric Eve
Senior Vice President
Community Relations
Global Consumer Group
Citigroup Inc.
850 Third Avenue, 12th floor
New York, NY 10022

Dear Mr. Eve: *Eric*

For the past twelve years, the annual Caribbean Multi-National Business Conference has been instrumental in encouraging investment, cross-border trade and business partnerships, the role played by executives of major corporations, medium and small-size businesses and entrepreneurs, and deepens the connections with key elected officials.

Your support and that of *CITI* went a long way to make the Conference a success, and has fostered on-going growth in business achievements and impactful policy decisions. We appreciate your encouragement, your personal participation, and the very stature your presence brings to the Conference. We do get concrete results and expressed appreciation of new opportunities.

We can assure you that all the key stakeholders, Members of Congress, Heads and Ministers of Government, Elected Officials, Community and Business Leaders are all aware and appreciative of yours and *CITI'S* participation in this very important mission.

This year, the Thirteenth Annual Conference is scheduled to be held in St. Maarten, November 6 - 9, 2008, and promises to further strengthen and expand on the work done by many of the Caribbean countries developing economies, in collaboration with the emerging markets initiatives in the U.S. The quality of the sessions and the high level of participation is now legendary, and is anxiously awaited each year.

Enclosed is a Power Point presentation of the sponsorship opportunities the Conference provides, and also a program and recap of the 2006-2007 Conference. We know of your interest to deepen the *CITI* local, regional and global connections, and I know the Conference can achieve that. It is our sincere wish that this presentation motivates your sponsorship.

Organized by Carib News Foundation. A non-profit project 501-C3 corporation

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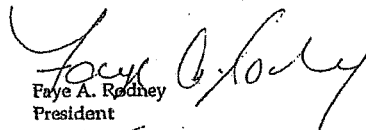
- 2 -

We would be happy to answer any questions you might have or to fill in any detail. I can be reached by e-mail: KBRodney@nycaribnews.com or (212) 944-1991.


Because we know of your busy schedule, I will also follow up with your office to ascertain interest level.

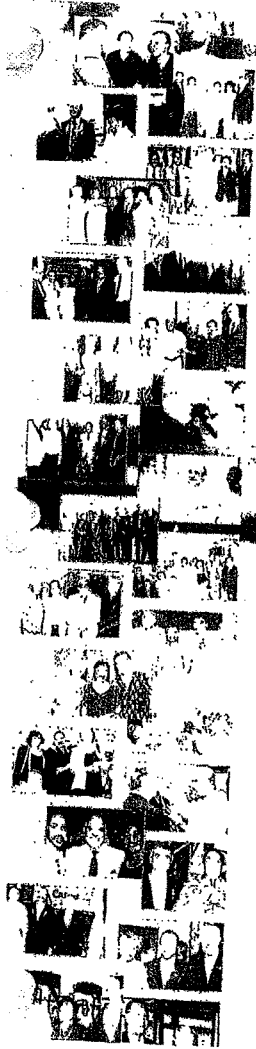
Thanks for your kind consideration.

Best regards,



Faye A. Rodney
President


Karl B. Rodney
Publisher/CEO



OPENING THE REGION

INVESTMENT & BUSINESS OPPORTUNITIES

BUILDING THE GLOBAL NETWORK

**GOVERNMENT LEADERS - ELECTED OFFICIALS
IMPACTING ECONOMIC POLICIES**

PARTNERSHIPS

**CORPORATE EXECUTIVES - SEEKING
EXPANSION & GROWTH**

**DOING BUSINESS
TOGETHER**



“IMPACTFUL”

EXPERIENCE THE POWER OF THE



**THIRTEENTH
ANNUAL
CARIBBEAN
MULTI-NATIONAL
BUSINESS
CONFERENCE**

ST. MAARTEN

NOVEMBER 6 - 9, 2008

BUILDING KEY CONNECTIONS FOR GROWTH



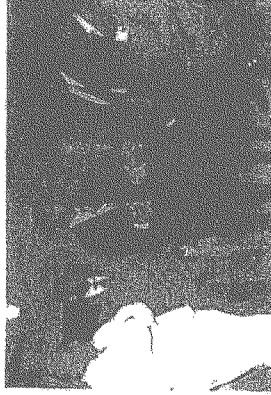
THE MISSION

- ◆ To bring together businesses, community, and government leaders interested in understanding the economic opportunities in the Caribbean marketplace locally and in the Caribbean.
- ◆ To make a global community among Diverse Business entities and The Caribbean.
- ◆ To Link the emerging markets of the U.S and the Developing Economics of the Caribbean and Latin America.

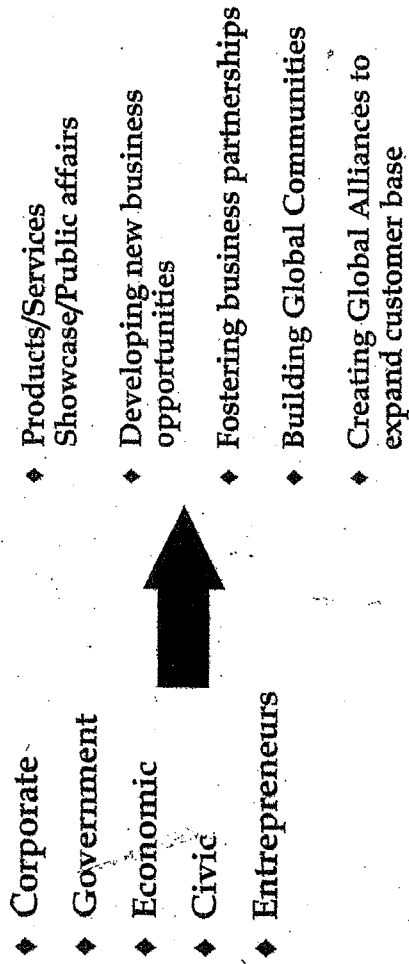


THE OPPORTUNITY

- ◆ **Marketing:** Understanding the market in the US and the Caribbean.
- ◆ **Business development:** Meeting potential customers and potential partners.
- ◆ **Strategic analysis:** Understanding the possibilities of emerging markets in the US and the Caribbean.
- ◆ **Corporate image:** Demonstrating your commitment to the Caribbean Community, and the program of diversity.
- ◆ **Community relations:** Establishing lasting relationships with key community leaders.
- ◆ **Government relations:** Meeting with and discussing topics of interest with significant elected officials from the US & the Caribbean.



STRATEGIC PARTNERSHIPS



THE FACTS

- ◆ 31.9 billion US dollars in foreign investment Came into the Caribbean, up 36 percent from 1996.
- ◆ Tourism is the key economic foundation in the Caribbean. Approximately 11 million cruise passengers a year visit the Caribbean, providing Import/Export Opportunities.
- ◆ The Caribbean, in aggregate, is the 10th largest export market for the U.S, surpassing France and other countries, and providing opportunities for marketplace products.
- ◆ The \$15 billion market of the Caribbean American community and overseas



THE LEGACY

- * Jamaica - 1996
- * Barbados - 1997
- * St. Lucia - 1998
- * St. Croix/USVI - 1999
- * Jamaica - 2000
- * Grenada - 2001
- * St. Maarten - 2002
- * The Bahamas-2003
- * St. Kitts-Nevis-2004
- * St. Thomas, USVI - 2005
- * Panama city, panama - 2006
- * Antigua & Barbuda - 2007

- * Building Consumers Awareness
- * Developing Working Alliances
- * Reaching Defined Target Markets
- * Making the Right Connections
- * Expanding Diverse Market Places
- * Successful Joint/Ventures
- Successful Regional Investments



THE OVERVIEW

"Some companies have discovered that the Caribbean offers a great deal more than beautiful beaches and sunshine. They have recognized its tactical importance in this era of globalization. We are proud to provide a useful platform for companies that are seeking to sharpen their international competitiveness.

For the past twelve years, the Annual Multinational Business Conference has been creating links between the Caribbean, Central America and the U.S. Usually, during four days of workshops, luncheons and dinners, Caribbean Political Heads of State and Ministers of Government, Members of the Congressional Black Caucus, Local and Regional Politicians, business persons and influential individuals from the U.S. and the Caribbean discuss, interact and network around issues of mutual concern. Relationships are built and business deals are made.

We hope that in 2008 you will join us"



PARTICIPATION

Platinum LEVEL - \$75,000

- ❖ **Keynote Speaker at Main Event**
- ❖ **Sponsor Private VIP Reception and specially arranged forum**
- ❖ **Special Awards Presentation**
- ❖ **Display, Exhibition and signage**
- ❖ **Area of Conference -Reserved for exclusive sponsorship**
- ❖ **Full page Ad in program**
- ❖ **Air Transportation for 2 people**
- ❖ **Accommodations: One Suite and One Standard Room**
- ❖ **Included in all printed materials**
- ❖ **Included in Internet promotion**
- ❖ **Display company logo and link to our website**
- ❖ **Sponsor of a Gala Event**
- ❖ **Sponsor and Participate in a workshop**
- ❖ **Representative listed in program with bio and photo**



PARTICIPATION

GOLD LEVEL - \$50,000

- * Sponsor a Workshop
- * Sponsor a Gala Event
- * Display, Exhibition and signage
- * Included in all Printed Material
- * Included in all Internet Promotion
- * Display of Company Logo and Link to Our Website
- * Full Page Ad in Program
- * Representation in the Brochure
- * Air Transportation & room accommodations for 1



PARTICIPATION

SILVER LEVEL - \$25,000

- ◆ Sponsor & Participate in a Workshop
- ◆ Display and Exhibition
- ◆ Banner in Public areas & at workshop
- ◆ Included in all printed materials
- ◆ Included in Radio and TV Promotions
- ◆ Included in the internet promotion
- ◆ Sponsor an event i.e. breakfast, lunch or dinner
- ◆ Full Page ad in program and recap
- ◆ Representatives listed in program with bio & photos
- ◆ Representatives listed in brochure



PARTICIPATION

SUPPORTER

\$15,000

- ◆ Display and Exhibition
- ◆ Banner in Public areas & at workshop
- ◆ Included in all printed materials
- ◆ Included in Radio and TV Promotions
- ◆ Included in the internet promotion
- ◆ Full Page ad in program and recap
- ◆ Representatives listed in brochure
- ◆ Representatives listed in program with bio & photo

\$10,000

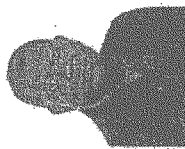
- ◆ Display and Exhibition
- ◆ Banner in Public areas & at workshop
- ◆ Included in some printed materials
- ◆ Included in some Radio and TV Promotions
- ◆ Included in the internet promotion
- ◆ Full Page ad in program and 1/2 page in recap
- ◆ Representatives listed in program



Government Participation



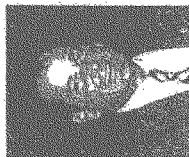
"This Conference is keeping us informed. There would never have been a banana problem had we (CBC) known about the issue before it went to the WTO."
Congressman Charles Rangel



"The Conference in Antigua with Members of the U.S. Congress was very important and extremely vital to both the U.S. and Caribbean interests. It highlighted the need for the Caribbean to pay greater attention to the role of Congress in the formulation of U.S. policy."
*Hon. Baldrich Spencer
Prime Minister of Antigua*



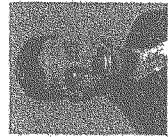
"The conference is central to the promotion of our mutual interests in the U.S. in general, New York City in particular, and the Caribbean. It is essential for all of us to work together to spur economic growth and social expansion at home and in our neighborhoods."
*William Thompson, Comptroller,
New York City*



"The results of the Conference went far beyond our expectations. The process of bringing families together, of sharing a vision for our countries, couldn't have been scripted. The sessions brought out ideas, options and other benefits which should be long lasting."
*Juan Carlos Nazarro, Mayor, Pauduna
City, Republic of Panama*



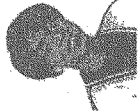
CORPORATE PARTICIPANTS



Eric Eric - SVP Community Relations, CITICORP. - "The time is ripe for Caribbean nations to come together and get on "the road," to articulate the strength of their economies and stability of their business climates. The Conference is a great place to start to open clear lines of communication between the private and public sectors of the Caribbean and the U.S."



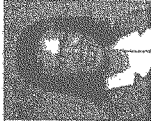
Marilyn Johnson, VP Market Development, IBM Corporation - "IBM and its partner ENI Enterprise Network, through its presentation at the Conference, is taking the audience up through levels of technology, understanding the application of E-commerce. This conference makes a difference in the lives of the attendees."



Karen Boykin-Fowns, Senior Director of Public Affairs - "The conference provides an ideal opportunity for Pfizer - it demonstrates its commitment to health forums internationally, but also to network with key decision makers. Collaboration is necessary between the Caribbean to make improvements and adjustments to healthcare and its delivery."

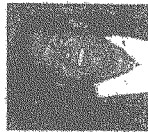


Edward J. Goldberg, SVP Government & Consumer Affairs, MACYS - "We have whole files of opportunities to build business partnerships in the current corporate environment. The conference is conducive to exploring new areas of business, and we have taken advantage of this to both the region and MACY's benefit."



Marie Long, VP Constituency Relations, AT&T Foundation - "As many of you know, AT&T has changed in the last 5 years. Its growth, dynamism and change have created what some of us call the new AT&T. The real and driving force behind our success as a corporate entity is the culture of inclusion and collaboration. We recognize the great work being done at the

conference to improve business and personal lives, exchange ideas, and assist alternative strategies that could lead to technology transfer and to growth."



Javier Enois, FYP Human Resources, HSEC Bank - "We provide financial services to a vast array of businesses and individuals, and this gives us a unique perspective on different cultures and ways of doing business. We want to engage our partners in mutually beneficial relationships within our communities and that is why we seize the opportunity to link with CARIB NEWS and the Conference. It is a tremendous value to us."

UNIQUE OPPORTUNITIES



Ambassador Audrey Young

"If only the sons and daughters of Africa will remember from whence they came, then our roots should be a constant reminder of who we are and where our comrades can go with our input. This is why the Carib News Conference is so important and that is why I support it."



Hon. Percy Sutton

"We badly needed a forum to address the need of us working together. This conference is an excellent idea and we should have been doing this long ago."



Hazel N. Dukes, President, New York State NAACP

"The conferences, presenters and participants have been extraordinary. I have gained tremendous knowledge on the Caribbean Diaspora. I continue to promote and foster relationships with communities here and at home."



Harry Belafonte, Entertainer

"The Conference is like a table set with a feast of great ideas provided by some of the best minds. The table is set - it is for us to partake."



David Dinkins, Former Mayor of New York City

"Education is the very key for the development of our people. I have always held that position; that is why I am so pleased to participate in the Education Forum at the Conference. There is an eagerness on the part of the audience to know more about our system. The collaborative effort of CARIB NEWS and the Conference wins my support."



Roy Bastible, President/CEO Caribbean American Chamber of Commerce

"The work of the Conference is legendary in the Caribbean and the U.S. Where else do you find this level of leadership from all sectors coming together to advance doing business. It is the most effective way of building a Global Network."



Susan Taylor, Editor Emeritus, Essence Magazine

"It is always so wonderful to experience the drive, enthusiasm and determination of the Conference participants. It says something wonderful is happening and we all need to tap into it. It provides such outstanding opportunities to connect with real people who can make things happen."



Lloyd Williams, President/CEO Greater Harlem Chamber of Commerce

"I have always advocated cross-border business opportunities for the Chamber members, and that is why for the entire twelve years of the conference, the Chamber has made it a priority event. Our members have reaped the benefits and have also made great contributions."

INVEST IN SUCCESS



**A WEEK-END THAT CHANGES
LIVES**

'EXPERIENCE THE POWER'



15

09-3698 0102

Exhibit 8

Board
David Skaggs, Chair Porter Goss, Co-Chair
Yvonne Burke Jay Engen
Karen English William Frenzel
Allison Hayward Abner Mikva



Leo J. Wise, Staff Director & Chief Counsel
1017 Longworth House Office Building
(202) 225-9739
(202) 226-0997 fax
email address: leo@mail.house.gov
website address: oce.house.gov

OFFICE OF CONGRESSIONAL ETHICS
 UNITED STATES HOUSE OF REPRESENTATIVES
 WASHINGTON, DC 20515

Mr. Frank Weber
 Internal Revenue Service
 Freedom of Information Reading Room
 1111 Constitution Avenue, NW
 Washington, DC 20224

March 31, 2009

Dear Mr. Weber,

Thank you for talking with me this afternoon and for offering to help me with this request. I need to know if Carib News Charities filed a 990-PF for tax years 2006, 2007, and 2008 (I have included tax year 2008 in the event that the foundation filed before the filing deadline). I understand that the organization is not required to file if it did not receive donations in excess of \$25,000. If the foundation has filed a 990-PF for 2006, 2007, or 2008, we would like to have a copy of the tax form(s). In the event that it takes several days, weeks, or months to receive the requested copies, it would be helpful to have an answer to the question whether the organization has filed and for what year(s) tax form(s) exist.

It is our understanding that the organization also does business as Carib News Foundation; however, Carib News Foundation is not found in Publication 78.

My telephone number is 202-225-9739 and my email is Elizabeth.horton@mail.house.gov. Thank you again for your help with this matter.

Sincerely,

Elizabeth Horton

Form **4506-A**
 (Rev. January 2009)
 Department of the Treasury
 Internal Revenue Service

**Request for Public Inspection or Copy
 of Exempt or Political Organization IRS Form**

OMB No. 1545-0495

▶ Type or print clearly. Request may be rejected if the form is incomplete or illegible.

TIP You may not have to complete Form 4506-A to get the copies you need.

- Internet. Form 8871, Political Organization Notice of Section 527 Status, and Form 8872, Political Organization Report of Contributions and Expenditures, are available for inspection and printing from the Internet. The website address for both forms is www.irs.gov/polorgs.
- Public disclosure by the organization. Exempt or political organizations must make their returns, reports, notices, and exempt applications available for public inspection. You can visit the organization to inspect the material instead of requesting it from the IRS. The organization may be able to mail the copies to you.

1 Exempt or political organization. If a multiple request, please attach list of names, forms, and tax years.

Name: CARIB NEWS CHARITIES Employer identification number (if known): 13-3632050
 Address: 7 WEST 36th STREET, FLOOR 8
 City or town, state, and ZIP code: NEW YORK, NY 10018

2 Requestor

Name: OFFICE OF CONGRESSIONAL ETHICS Contact person: ELIZABETH HORTON
 Address: 1017 LONGWORTH BUILDING Phone: (202) 225-9739
 City or town, state, and ZIP code: WASHINGTON, DC 20515 Date: 3/31/09

3 Category of requester: Commercial user Non-commercial scientific institution
 Educational institution Media All others
 You must check a box.

4 Reason for request. All requesters except for commercial users must provide an explanation of how the records will be used to avoid being charged the commercial rate. Attach additional sheets if necessary.
TO CONFIRM WHETHER FOUNDATION RECEIVED FUNDING IN
TAX YEARS 2006, 2007, 2008

Lines 5-9. For each applicable form, check the box(es) for the item(s) you are requesting. You may request more than one form. For each form requested, check either the copy, inspection, or CD/DVD box and enter the specific tax year(s), as indicated. If ordering a partial set on CD/DVD, indicate the format, state(s), and month(s) requested.

5 Form 990, Form 990-EZ CD/DVD Format: Alchemy Raw
 Copy Inspection
 Tax year(s) requested: _____
 State(s): _____
 Months: _____

6 Form 990-PF CD/DVD Format: Alchemy Raw
 Copy Inspection
 Tax year(s) requested: 2006, 2007, 2008 (if filed)
 State(s): _____
 Months: _____

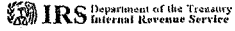
7 Form 990-T (501(c)(3) organizations filed after 8/17/2008) CD/DVD Format: Alchemy Raw
 Copy Inspection
 Tax year(s) requested: _____
 State(s): _____
 Months: _____

8 Form 5227 Copy Inspection
 Tax year(s) requested: _____

9 Form 1023, 1024 or Determination Letter Copy Inspection
 Tax year(s) requested: _____

IRS Use Only

The form requested above was inspected by (name of requester) _____ IRS office where inspection was made _____
 Signature of employee present at inspection _____ Date _____



OGDEN UT 84201-0058

OFFICE OF CONGRESSIONAL ETHICS
ATTN: ELIZABETH HORTON
1017 LONGWORTH BUILDING
WASHINGTON DC 20515

CUT OUT AND RETURN THE VOUCHER AT THE BOTTOM OF THIS PAGE IF YOU ARE MAKING A PAYMENT,
EVEN IF YOU ALSO HAVE AN INQUIRY.

The IRS address must appear in the window.

Use for payments

BODCD-TE

0412606945

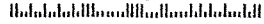
Letter Number: LTR3983C
Letter Date: 2009-04-17
Tax Period: 000000



133632050

INTERNAL REVENUE SERVICE

OGDEN UT 84201-0058



OFFICE OF CONGRESSIONAL ETHICS
ATTN: ELIZABETH HORTON
1017 LONGWORTH BUILDING
WASHINGTON DC 20515

133632050 RV CARI 00 2 000000 670 000000000000

09-3698 0106

IRS Internal Revenue Service

OGDEN UT 84201-0058

In reply refer to: 0412606945
Apr. 17, 2009 LTR 3983C E1
13-3632050 000000 00 000
.00027842
BODC: TE

OFFICE OF CONGRESSIONAL ETHICS
ATTN: ELIZABETH HORTON
1017 LONGWORTH BUILDING
WASHINGTON DC 20515

Taxpayer Identification Number: 13-3632050
Organization: Carib News Charities, Inc.

Form(s): 990PF

Tax Period(s): May 31, 2006 May 31, 2007
May 31, 2008

Dear Requester:

We received your Mar. 31, 2009, request for a copy of the Form(s) 990PF relating to the organization(s) identified above. Enclosed is a copy of the form(s) you requested. We are unable to provide a copy of the form(s) requested for the following tax period(s):

May 31, 2006

We regret that we can not provide a photocopy of return(s) for the organization(s) and year(s) you requested. There are a variety of reasons why these returns are not available, for example:

- the organization may not be required to file the requested return because its gross receipts are \$25,000 or less.
- the organization may be included in a group ruling and the parent may have filed a group return.
- the organization may have received an extension of time to file.
- processing of the organization's return may not be complete.
- return(s) are destroyed after a certain number of tax years.
- the organization may not be required to file.

If you have any questions, please write us at the address shown at the top of the first page of this letter. Or, you may call us toll free at 1-877-829-5500.

Whenever you write, please include this letter and, in the spaces below, give us your telephone number with the hours we can reach you. Please keep a copy of this letter for your records.

Telephone Number () _____ Hours _____

THIS IS A COPY OF A LIVE RETURN FROM SMIPS. OFFICIAL USE ONLY.

Form **990-PF** **Return of Private Foundation or Section 4947(a)(1) Nonexempt Charitable Trust Treated as a Private Foundation** OMB No 1545-0052
2005

Department of the Treasury Internal Revenue Service Note: The organization may be able to use a copy of this return to satisfy state reporting requirements.

For calendar year 2005, or tax year beginning June 1, 2005, and ending May 31, 2006

G Check all that apply. Initial return Final return Amended return Address change Name change

Use the IRS label. **Carib News Charities Inc** A Employer identification number **13-3632050**
 Otherwise, print or type. Number and street (or P.O. box number if mail is not delivered to street address) Room/suite B Telephone number (see page 10 of the instructions)
15 West 39th Street **13** ()
 See Specific Instructions. City or town, state, and ZIP code C If exemption application is pending, check here
New York, NY 10018 D 1. Foreign organizations, check here
 H Check type of organization: Section 501(c)(3) exempt private foundation 2. Foreign organizations meeting the 85% test, check here and attach computation
 Section 4947(a)(1) nonexempt charitable trust Other taxable private foundation E If private foundation status was terminated under section 507(b)(1)(A), check here
 I Fair market value of all assets at end of year (from Part II, col. (c)). J Accounting method: Cash Accrual F If the foundation is in a 60-month termination under section 507(b)(1)(B), check here
 Other (specify) (Part I, column (d) must be on cash basis)

Part I Analysis of Revenue and Expenses (The total of amounts in columns (d), (e), and (f) may not necessarily equal the amounts in column (g) (see page 11 of the instructions).)		(e) Revenue and expenses per books	(f) Net investment income	(g) Adjusted net income	(h) Disbursements for charitable purposes (cash basis only)
1	Contributions, gifts, grants, etc., received (attach schedule)				
2	Check <input type="checkbox"/> if the foundation is not required to attach Sch B				
3	Interest on savings and temporary cash investments				
4	Dividends and interest from securities				
5a	Gross rents				
b	Net rental income or (loss)				
6a	Net gain or (loss) from sale of assets not on line 10				
b	Gross sales price for all assets on line 6a				
7	Capital gain net income (from Part IV, line 2)				
8	Net short-term capital gain				
9	Income modifications				
10a	Gross sales less returns and allowances				
b	Less: Cost of goods sold				
c	Gross profit or (loss) (attach schedule)				
11	Other income (attach schedule)				
12	Total. Add lines 1 through 11				
13	Compensation of officers, directors, trustees, etc.				
14	Other employee salaries and wages				
15	Pension plans, employee benefits				
16a	Legal fees (attach schedule)				
b	Accounting fees (attach schedule)				
c	Other professional fees (attach schedule)				
17	Interest				
18	Taxes (attach schedule) (see page 14 of the instructions)				
19	Depreciation (attach schedule) and depletion				
20	Occupancy				
21	Travel, conferences, and meetings				
22	Printing and publications				
23	Other expenses (attach schedule)				
24	Total operating and administrative expenses. Add lines 13 through 23				
25	Contributions, gifts, grants paid				
26	Total expenses and disbursements. Add lines 24 and 25				
27	Subtract line 26 from line 12:				
a	Excess of revenue over expenses and disbursements				
b	Net investment income (if negative, enter -0-)				
c	Adjusted net income (if negative, enter -0-)				

Process as of 1/13/08

SCANNED JAN 15 2008 04:23:20 04:32 REC 05 2007

RECEIVED IN CORR IRS - OSC -645 AUG 27 2007 OGDEN, UTAH

For Privacy Act and Paperwork Reduction Act Notice, see the instructions. Cat No 11289K Form 990-PF 2005

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Part II Balance Sheets		Attached schedules and amounts in the description column should be for end-of-year amounts only (See instructions)		
		Beginning of year (a) Book Value	End of year (b) Book Value (c) Fair Market Value	
Assets	1	Cash—non-interest-bearing	0	0
	2	Savings and temporary cash investments		
	3	Accounts receivable		
		Less: allowance for doubtful accounts		
	4	Pledges receivable		
		Less: allowance for doubtful accounts		
	5	Grants receivable		
	6	Receivables due from officers, directors, trustees, and other disqualified persons (attach schedule) (see page 15 of the instructions)		
	7	Other notes and loans receivable (attach schedule)		
		Less: allowance for doubtful accounts		
	8	Inventories for sale or use		
	9	Prepaid expenses and deferred charges		
	10a	Investments—U S and state government obligations (attach schedule)		
		b Investments—corporate stock (attach schedule)		
		c Investments—corporate bonds (attach schedule)		
	11	Investments—land, buildings, and equipment basis		
	Less: accumulated depreciation (attach schedule)			
12	Investments—mortgage loans			
13	Investments—other (attach schedule)			
14	Land, buildings, and equipment basis			
	Less: accumulated depreciation (attach schedule)			
15	Other assets (describe)			
16	Total assets (to be completed by all filers—see page 16 of the instructions. Also, see page 1, item f)	972		
Liabilities	17	Accounts payable and accrued expenses	0	0
	18	Grants payable		
	19	Deferred revenue		
	20	Loans from officers, directors, trustees, and other disqualified persons		
	21	Mortgages and other notes payable (attach schedule)		
	22	Other liabilities (describe)		
23	Total liabilities (add lines 17 through 22)			
Net Assets or Fund Balances	Organizations that follow SFAS 117, check here <input type="checkbox"/> and complete lines 24 through 26 and lines 30 and 31.			
	24	Unrestricted		
	25	Temporarily restricted		
	26	Permanently restricted		
	Organizations that do not follow SFAS 117, check here <input type="checkbox"/> and complete lines 27 through 31.			
	27	Capital stock, trust principal, or current funds		
	28	Paid-in or capital surplus, or land, bldg., and equipment fund		
	29	Retained earnings, accumulated income, endowment, or other funds		
	30	Total net assets or fund balances (see page 17 of the instructions)	0	0
31	Total liabilities and net assets/fund balances (see page 17 of the instructions)	0	0	

Part III Analysis of Changes in Net Assets or Fund Balances		
1	Total net assets or fund balances at beginning of year—Part II, column (a), line 30 (must agree with end-of-year figure reported on prior year's return)	0
2	Enter amount from Part I, line 27a	
3	Other increases not included in line 2 (itemize)	
4	Add lines 1, 2, and 3	
5	Decreases not included in line 2 (itemize)	
6	Total net assets or fund balances at end of year (line 4 minus line 5)—Part II, column (b), line 30	0

09-3698 0109

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Part IV Capital Gains and Losses for Tax on Investment Income

(a) List and describe the kind(s) of property sold (e.g., real estate, 2-story brick warehouse, or common stock, 200 abc MLC Co)

	(b) How acquired P—Purchase D—Donation	(c) Date acquired (mo., day, yr.)	(d) Date sold (mo., day, yr.)
1a			
b			
c			
d			
e			

(e) Gross sales price	(f) Depreciation allowed (or allowable)	(g) Cost or other basis plus expense of sale	(h) Gain or (loss) (e) plus (f) minus (g)
a			
b			
c			
d			
e			

Complete only for assets showing gain in column (h) and owned by the foundation on 12/31/69

(i) FMV as of 12/31/69	(j) Adjusted basis as of 12/31/69	(k) Excess of col (i) over col (j), if any	(l) Gain (Col (h) gain minus col (k), but not less than -0-) or Losses (from col (h))
a			
b			
c			
d			
e			

2 Capital gain net income or (net capital loss) If gain, also enter in Part I, line 7
If (loss), enter -0- in Part I, line 7 **2**

3 Net short-term capital gain or (loss) as defined in sections 1222(5) and (6).
If gain, also enter in Part I, line 8, column (c) (see pages 13 and 17 of the instructions).
If (loss), enter -0- in Part I, line 8. **3**

Part V Qualification Under Section 4940(e) for Reduced Tax on Net Investment Income

(For optional use by domestic private foundations subject to the section 4940(a) tax on net investment income.)

If section 4940(c)(2) applies, leave this part blank.

Was the organization liable for the section 4942 tax on the distributable amount of any year in the base period? Yes No
If "Yes," the organization does not qualify under section 4940(e). Do not complete this part.

1 Enter the appropriate amount in each column for each year; see page 18 of the instructions before making any entries.

(a) Base period years Calendar year (or tax year beginning in)	(b) Adjusted qualifying distributions	(c) Net value of noncharitable-use assets	(d) Distribution ratio (col. (b) divided by col. (c))
2004			
2003			
2002			
2001			
2000			

2 Total of line 1, column (d) **2**

3 Average distribution ratio for the 5-year base period—divide the total on line 2 by 5, or by the number of years the foundation has been in existence if less than 5 years **3**

4 Enter the net value of noncharitable-use assets for 2005 from Part X, line 5. **4**

5 Multiply line 4 by line 3 **5**

6 Enter 1% of net investment income (1% of Part I, line 27b) **6**

7 Add lines 5 and 6 **7**

8 Enter qualifying distributions from Part XII, line 4
If line 8 is equal to or greater than line 7, check the box in Part VI, line 1b, and complete that part using a 1% tax rate. See the Part VI instructions on page 18. **8**

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Part VI Excise Tax Based on Investment Income (Section 4940(a), 4940(b), 4940(e), or 4946—see page 18 of the instructions)

Table with 11 rows for excise tax calculations. Rows include: 1a Exempt operating foundations, b Domestic organizations, 2 Tax under section 511, 3 Add lines 1 and 2, 4 Subtitle A (income) tax, 5 Tax based on investment income, 6 Credits/Payments (6a-6d), 7 Total credits and payments, 8 Enter any penalty, 9 Tax due, 10 Overpayment, 11 Enter the amount of line 10 to be credited to 2006 estimated tax.

Part VII-A Statements Regarding Activities

Table with 13 rows for activity statements. Rows include: 1a Political campaign participation, b Political purposes, c Form 1120-POL, d Tax on political expenditures, e Reimbursement for political expenditure tax, 2 Previously reported activities, 3 Changes in governing instrument, 4a Unrelated business gross income, 4b Tax return filing, 5 Liquidation/termination, 6-7 Section 508(e) requirements, 8a-8b State reporting, 9 Private operating foundation status, 10-11 Public inspection requirements, 12 Books in care of, 13 Section 4947(a)(1) trusts.

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Part VII-B Statements Regarding Activities for Which Form 4720 May Be Required

File Form 4720 if any item is checked in the "Yes" column, unless an exception applies.

	Yes	No
1a During the year did the organization (either directly or indirectly):		
(1) Engage in the sale or exchange, or leasing of property with a disqualified person? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(2) Borrow money from, lend money to, or otherwise extend credit to (or accept it from) a disqualified person? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(3) Furnish goods, services, or facilities to (or accept them from) a disqualified person? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(4) Pay compensation to, or pay or reimburse the expenses of, a disqualified person? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(5) Transfer any income or assets to a disqualified person (or make any of either available for the benefit or use of a disqualified person)? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(6) Agree to pay money or property to a government official? (Exception. Check "No" if the organization agreed to make a grant to or to employ the official for a period after termination of government service, if terminating within 90 days.) <input type="checkbox"/> Yes <input type="checkbox"/> No		
b If any answer is "Yes" to 1a(1)-(6), did any of the acts fail to qualify under the exceptions described in Regulations section 53.4941(c)-3 or in a current notice regarding disaster assistance (see page 20 of the instructions)? Organizations relying on a current notice regarding disaster assistance check here <input type="checkbox"/>	1b	X
c Did the organization engage in a prior year in any of the acts described in 1a, other than excepted acts, that were not corrected before the first day of the tax year beginning in 2005? <input type="checkbox"/>	1c	X
2 Taxes on failure to distribute income (section 4942) (does not apply for years the organization was a private operating foundation defined in section 4942(d)(3) or 4942(f)(5)):		
a At the end of tax year 2005, did the organization have any undistributed income (lines 6d and 6e, Part XIII) for tax year(s) beginning before 2005? <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes," list the years: 20..... 20..... 20..... 20.....		
b Are there any years listed in 2a for which the organization is not applying the provisions of section 4942(a)(2) (relating to incorrect valuation of assets) to the year's undistributed income? (If applying section 4942(a)(2) to all years listed, answer "No" and attach statement—see page 20 of the instructions.) <input type="checkbox"/>	2b	X
c If the provisions of section 4942(a)(2) are being applied to any of the years listed in 2a, list the years here: 20..... 20..... 20..... 20.....		
3a Did the organization hold more than a 2% direct or indirect interest in any business enterprise at any time during the year? <input type="checkbox"/> Yes <input type="checkbox"/> No		
b If "Yes," did it have excess business holdings in 2005 as a result of (1) any purchase by the organization or disqualified persons after May 26, 1989; (2) the lapse of the 5-year period (or longer period approved by the Commissioner under section 4942(c)(7) to dispose of holdings acquired by gift or bequest; or (3) the lapse of the 10-, 15-, or 20-year first phase holding period? (Use Schedule C, Form 4720, to determine if the organization had excess business holdings in 2005.) <input type="checkbox"/>	3b	X
4a Did the organization invest during the year any amount in a manner that would jeopardize its charitable purposes? <input type="checkbox"/>	4a	X
b Did the organization make any investment in a prior year (but after December 31, 1969) that could jeopardize its charitable purpose that had not been removed from jeopardy before the first day of the tax year beginning in 2005? <input type="checkbox"/>	4b	X
5a During the year did the organization pay or incur any amount to:		
(1) Carry on propaganda, or otherwise attempt to influence legislation (section 4945(a))? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(2) Influence the outcome of any specific public election (see section 4955); or to carry on, directly or indirectly, any voter registration drive? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(3) Provide a grant to an individual for travel, study, or other similar purposes? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(4) Provide a grant to an organization other than a charitable, etc., organization described in section 509(a)(1), (2), or (3), or section 4940(d)(2)? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(5) Provide for any purpose other than religious, charitable, scientific, literary, or educational purposes, or for the prevention of cruelty to children or animals? <input type="checkbox"/> Yes <input type="checkbox"/> No		
b If any answer is "Yes" to 5a(1)-(5), did any of the transactions fail to qualify under the exceptions described in Regulations section 53.4946 or in a current notice regarding disaster assistance (see page 20 of the instructions)? Organizations relying on a current notice regarding disaster assistance check here <input type="checkbox"/>	5b	X
c If the answer is "Yes" to question 5a(4), does the organization claim exemption from the tax because it maintained expenditure responsibility for the grant? <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes," attach the statement required by Regulations section 53.4945-5(f).		
6a Did the organization, during the year, receive any funds, directly or indirectly, to pay premiums on a personal benefit contract? <input type="checkbox"/> Yes <input type="checkbox"/> No		
b Did the organization, during the year, pay premiums, directly or indirectly, on a personal benefit contract? <input type="checkbox"/> Yes <input type="checkbox"/> No If you answered "Yes" to 6b, also file Form 8870	6b	X

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Part VIII Information About Officers, Directors, Trustees, Foundation Managers, Highly Paid Employees, and Contractors

1 List all officers, directors, trustees, foundation managers and their compensation (see page 21 of the instructions).

(a) Name and address	(b) Title, and average hours per week devoted to position	(c) Compensation (if not paid, enter -0-)	(d) Contributions to employee benefit plans and deferred compensation	(e) Expense account, other allowances

2 Compensation of five highest-paid employees (other than those included on line 1—see page 21 of the instructions). If none, enter "NONE."

(a) Name and address of each employee paid more than \$50,000	(b) Title and average hours per week devoted to position	(c) Compensation	(d) Contributions to employee benefit plans and deferred compensation	(e) Expense account, other allowances
NONE				

Total number of other employees paid over \$50,000

3 Five highest-paid independent contractors for professional services—(see page 21 of the instructions). If none, enter "NONE."

(a) Name and address of each person paid more than \$50,000	(b) Type of service	(c) Compensation
NONE		

Total number of others receiving over \$50,000 for professional services

Part IX-A Summary of Direct Charitable Activities

List the foundation's four largest direct charitable activities during the tax year. Include relevant statistical information such as the number of organizations and other beneficiaries served, conferences convened, research papers produced, etc

	Expenses
1 NONE	
2	
3	
4	

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Part IX-B Summary of Program-Related Investments (see page 22 of the instructions)

Describe the two largest program-related investments made by the foundation during the tax year on lines 1 and 2

	Amount
1	
2	
All other program-related investments. See page 22 of the instructions.	
3	
Total. Add lines 1 through 3.	

Part X Minimum Investment Return (All domestic foundations must complete this part. Foreign foundations, see page 22 of the instructions.)

1 Fair market value of assets not used (or held for use) directly in carrying out charitable, etc., purposes:		
a Average monthly fair market value of securities	1a	0
b Average of monthly cash balances	1b	
c Fair market value of all other assets (see page 23 of the instructions)	1c	
d Total (add lines 1a, b, and c)	1d	
2 Reduction claimed for blockage or other factors reported on lines 1a and 1c (attach detailed explanation)	2	
3 Acquisition indebtedness applicable to line 1 assets	3	
4 Cash deemed held for charitable activities. Enter 1 1/2% of line 3 (for greater amount, see page 23 of the instructions)	4	
5 Net value of noncharitable-use assets. Subtract line 4 from line 3. Enter here and on Part V, line 4	5	
6 Minimum investment return. Enter 5% of line 5	6	

Part XI Distributable Amount (see page 23 of the instructions) (Section 4942(j)(3) and (j)(5) private operating foundations and certain foreign organizations check here and do not complete this part.)

1 Minimum investment return from Part X, line 6	1	0
2a Tax on investment income for 2005 from Part VII, line 5	2a	
2b Income tax for 2005. (This does not include the tax from Part VI.)	2b	
3 Add lines 2a and 2b	3	
4 Distributable amount before adjustments. Subtract line 2c from line 1	4	
5 Recoveries of amounts treated as qualifying distributions	5	
6 Add lines 3 and 4	6	
7 Deduction from distributable amount (see page 24 of the instructions)	7	
8 Distributable amount as adjusted. Subtract line 7 from line 6. Enter here and on Part XIII, line 1	8	

Part XII Qualifying Distributions (see page 24 of the instructions)

1 Amounts paid (including administrative expenses) to accomplish charitable, etc., purposes:	
a Expenses, contributions, gifts, etc.—total from Part I, column (d), line 25	1a
b Program-related investments—total from Part IX-B	1b
2 Amounts paid to acquire assets used (or held for use) directly in carrying out charitable, etc., purposes	2
3 Amounts set aside for specific charitable projects that satisfy the:	
a Suitability test (prior IRS approval required)	3a
b Cash distribution test (attach the required schedule)	3b
4 Qualifying distributions. Add lines 1a through 3b. Enter here and on Part V, line 8, and Part XIII, line 4	4
5 Organizations that qualify under section 4940(e) for the reduced rate of tax on net investment income. Enter 1% of Part I, line 27b (see page 24 of the instructions)	5
6 Adjusted qualifying distributions. Subtract line 5 from line 4	6

Note: The amount on line 6 will be used in Part V, column (b), in subsequent years when calculating whether the foundation qualifies for the section 4940(e) reduction of tax in those years.

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Part XIII Undistributed Income (see page 24 of the instructions)

	(a) Corpus	(b) Years prior to 2004	(c) 2004	(d) 2005
1 Distributable amount for 2005 from Part XI, line 7				
2 Undistributed income, if any, as of the end of 2004:				
a Enter amount for 2004 only				
b Total for prior years: 20____, 20____, 20____				
3 Excess distributions carryover, if any, to 2005:				
a From 2000				
b From 2001				
c From 2002				
d From 2003				
e From 2004				
f Total of lines 3a through e				
4 Qualifying distributions for 2005 from Part XII, line 4: ▶ \$ _____				
a Applied to 2004, but not more than line 2a				
b Applied to undistributed income of prior years (Election required—see page 25 of the instructions)				
c Treated as distributions out of corpus (Election required—see page 25 of the instructions)				
d Applied to 2005 distributable amount				
e Remaining amount distributed out of corpus				
5 Excess distributions carryover applied to 2005 (If an amount appears in column (d), the same amount must be shown in column (a).)				
6 Enter the net total of each column as indicated below:				
a Corpus. Add lines 3f, 4a, and 4e. Subtract line 5				
b Prior years' undistributed income. Subtract line 4b from line 2b				
c Enter the amount of prior years' undistributed income for which a notice of deficiency has been issued, or on which the section 4942(a) tax has been previously assessed				
d Subtract line 6c from line 6b. Taxable amount—see page 25 of the instructions				
e Undistributed income for 2004. Subtract line 4a from line 2a. Taxable amount—see page 25 of the instructions				
f Undistributed income for 2005. Subtract lines 4d and 5 from line 1. This amount must be distributed in 2006				
7 Amounts treated as distributions out of corpus to satisfy requirements imposed by section 170(b)(1)(E) or 4942(g)(3) (see page 25 of the instructions)				
8 Excess distributions carryover from 2000 not applied on line 5 or line 7 (see page 25 of the instructions)				
9 Excess distributions carryover to 2006. Subtract lines 7 and 8 from line 6a				
10 Analysis of line 9:				
a Excess from 2001				
b Excess from 2002				
c Excess from 2003				
d Excess from 2004				
e Excess from 2005				

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Part XIV Private Operating Foundations (see page 26 of the instructions and Part VII-A, question 9)

1a If the foundation has received a ruling or determination letter that it is a private operating foundation, and the ruling is effective for 2005, enter the date of the ruling

b Check box to indicate whether the organization is a private operating foundation described in section 4942(j)(3) or 4942(j)(5)

2a Enter the lesser of the adjusted net income from Part I or the minimum investment return from Part X for each year listed

	Prior 3 years				(e) Total
	(a) 2005	(b) 2004	(c) 2003	(d) 2002	
b 85% of line 2a					
c Qualifying distributions from Part XII, line 4 for each year listed					
d Amounts included in line 2c not used directly for active conduct of exempt activities					
e Qualifying distributions made directly for active conduct of exempt activities. Subtract line 2d from line 2c					
3 Complete 3a, b, or c for the alternative test relied upon.					
a "Assets" alternative test—enter:					
(1) Value of all assets					
(2) Value of assets qualifying under section 4942(j)(3)(B)(i)					
b "Endowment" alternative test—enter % of minimum investment return shown in Part X, line 6 for each year listed					
c "Support" alternative test—enter:					
(1) Total support other than gross investment income (interest, dividends, rents, payments on securities loans (section 512(a)(5)), or royalties)					
(2) Support from general public and 5 or more exempt organizations as provided in section 4942(j)(3)(E)(ii)					
(3) Largest amount of support from an exempt organization					
(4) Gross investment income					

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Part XV Supplementary Information (Complete this part only if the organization had \$5,000 or more in assets at any time during the year—see page 26 of the instructions.)

1 Information Regarding Foundation Managers:

a List any managers of the foundation who have contributed more than 2% of the total contributions received by the foundation before the close of any tax year (but only if they have contributed more than \$5,000). (See section 507(d)(2).)

b List any managers of the foundation who own 10% or more of the stock of a corporation (or an equally large portion of the ownership of a partnership or other entity) of which the foundation has a 10% or greater interest.

2 Information Regarding Contribution, Grant, Gift, Loan, Scholarship, etc., Programs:

Check here if the organization only makes contributions to preselected charitable organizations and does not accept unsolicited requests for funds. If the organization makes gifts, grants, etc. (see page 26 of the instructions) to individuals or organizations under other conditions, complete items 2a, b, c, and d.

a The name, address, and telephone number of the person to whom applications should be addressed:

b The form in which applications should be submitted and information and materials they should include:

c Any submission deadlines:

d Any restrictions or limitations on awards, such as by geographical areas, charitable fields, kinds of institutions, or other factors:

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Part XV Supplementary Information (continued)

3 Grants and Contributions Paid During the Year or Approved for Future Payment

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
<i>a Paid during the year</i>				
Total				3a
<i>b Approved for future payment</i>				
Total				3b

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Part XVI-A Analysis of Income-Producing Activities

Enter gross amounts unless otherwise indicated		Unrelated business income		Excluded by section 512, 513, or 514		(e)
		(a) Business code	(b) Amount	(c) Exclusion code	(d) Amount	Related or exempt function income (See page 26 of the instructions)
1 Program service revenue:						
a						
b						
c						
d						
e						
f						
g	Fees and contracts from government agencies					
2 Membership dues and assessments						
3 Interest on savings and temporary cash investments						
4 Dividends and interest from securities						
5 Net rental income or (loss) from real estate:						
a	Debt-financed property					
b	Not debt-financed property					
6 Net rental income or (loss) from personal property						
7 Other investment income						
8 Gain or (loss) from sales of assets other than inventory						
9 Net income or (loss) from special events						
10 Gross profit or (loss) from sales of inventory						
11 Other revenue:						
a						
b						
c						
d						
e						
12 Subtotal. Add columns (b), (d), and (e)						
13 Total. Add line 12, columns (b), (d), and (e) (See worksheet in line 13 instructions on page 27 to verify calculations.)						

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Part XVI-B Relationship of Activities to the Accomplishment of Exempt Purposes

Line No.	Explain below how each activity for which income is reported in column (e) of Part XVI-A contributed importantly to the accomplishment of the organization's exempt purposes (other than by providing funds for such purposes). (See page 27 of the instructions.)

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Part XVII Information Regarding Transfers To and Transactions and Relationships With Noncharitable Exempt Organizations

1 Did the organization directly or indirectly engage in any of the following with any other organization described in section 501(c) of the Code (other than section 501(c)(3) organizations) or in section 527, relating to political organizations?
a Transfers from the reporting organization to a noncharitable exempt organization of:
(1) Cash
(2) Other assets
b Other transactions:
(1) Sales of assets to a noncharitable exempt organization
(2) Purchases of assets from a noncharitable exempt organization
(3) Rental of facilities, equipment, or other assets
(4) Reimbursement arrangements
(5) Loans or loan guarantees
(6) Performance of services or membership or fundraising solicitations
c Sharing of facilities, equipment, mailing lists, other assets, or paid employees
d If the answer to any of the above is "Yes," complete the following schedule. Column (b) should always show the fair market value of the goods, other assets, or services given by the reporting organization.

Table with 4 columns: (a) Line no, (b) Amount involved, (c) Name of noncharitable exempt organization, (d) Description of transfers, transactions, and sharing arrangements.

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2a Is the organization directly or indirectly affiliated with, or related to, one or more tax-exempt organizations described in section 501(c) of the Code (other than section 501(c)(3)) or in section 527?
b If "Yes," complete the following schedule.

Table with 3 columns: (a) Name of organization, (b) Type of organization, (c) Description of relationship.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than taxpayer or fiduciary) is based on all information of which preparer has any knowledge.
Signature of officer or trustee: [Signature] Date: 1/29/07 Title: Chairman and
Preparer's signature: [Signature] Date: [Signature] Check if self-employed: [] Preparer's SSN or PTIN: 11-3398966
Firm's name (or name of self-employed), address, and ZIP code: RAB Accounting Services, 575 Neptune Ave, 190, Lakyn NY 1024 Phone no: ()

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Search for Charities, Online Version of Publication 78 Search Results

Organization

Name Includes

Carib Charities

At least one of the words

All of the words

Location

City

State All...

Country USA

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[Begin New Search](#) [Search Tips](#)

Show 25 [« Prev | 1-1 | Next »](#)

Name ▲
Carib News Charities Inc.

City	State	Country	Code
New York	NY	USA	4

[« Prev | 1-1 | Next »](#)

09-3698 0119.

**Deductibility Code**

Publication 78 uses a coding system to identify each organization listed by type and limitation on deductibility of charitable contributions to the organization. The code(s) displayed depend(s) on the code for which the organization qualifies. In cases where an organization has multiple deductibility codes, only the definition for each applicable deductibility code is displayed.

Code	Meaning
4	A private foundation, generally with a 30% deductibility limitation.

Close

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Exhibit 9

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended.

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re: Representative of IBM, Vice President Market Development, IBM
Review #: 09-2567; 09-4403; 09-3698; 09-6333; 09-2222
Date: May 8, 2009
Location: IBM Offices, Washington, D.C.
Participants: Leo Wise
Beth Horton
Lisa Palluconi, Counsel for Government Programs for IBM
Adrienne G. Rhone, Director Governmental Programs

Summary: The Representative of IBM is the Vice President of Market Development for IBM. She was interviewed pursuant to Reviews 09-2567; 09-4403; 09-3698; 09-6333; and 09-2222. The Representative of IBM helped arrange IBM's participation at the 13th Annual Caribbean Multinational Business Conference in 2008; she also participated at the event. We requested an interview with the Representative of IBM and she consented to an interview. The Representative of IBM made the following statements in response to our questioning:

1. The Representative of IBM was given an 18 U.S.C. § 1001 warning and she signed a written acknowledgement of the warning.
2. She attended the 13th Annual Caribbean Multinational Business Conference in 2008.
3. She attended the conference to extend IBM to areas that were not currently being served. She focuses on the Caribbean because of her division at IBM which is women and minorities. The Caribbean is an underdeveloped business unit for IBM.

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4. She first attended the conference in 2004, as a participant, to see if the conference would be a good fit for IBM to participate at as a sponsor.
5. IBM was an entry level sponsor in '05.
6. She dealt with Faye Rodney on conference matters.
7. After her attendance in '05, she received a thank you letter signed by the Rodneys that asked IBM to be a sponsor at the '06 conference.
8. IBM participated at the '05, '06, '07 and '08 conference.
9. The Rodneys continued their prior practice and sent a thank you letter with a request for sponsorship after the '07 conference for IBM to participate at the '08 conference.
10. The letter was sent to the Operations Executive and the decision to participate was decided as a team. Colin Ward, with ENI Systems, is one of IBM's business partners who also went to the conference.
11. The letter is the first communication regarding the conference.
12. After the letter is received, the team manager negotiates participation at the conference. Negotiations included timing of sessions (day/time). She requested Friday, right before or right after lunch, for the IBM session. It was important to have attendance by individuals interested in technology.
13. She also agreed to moderate the women's breakfast sponsored by Macy's.
14. The team manager would have worked with the Rodneys regarding the break-out sessions.
15. IBM controlled its own content for the session(s).
16. The first year IBM sponsored the conference, the sponsorship level was \$10,000. IBM sponsored the conference the following year at \$15,000, and in '08 the sponsorship went up to \$20,000 after IBM received a request from Faye Rodney for an increase. The Representative of IBM initially counter-offered \$18,000 but agreed to the \$20,000 at the urging of Ms. Rodney.
17. IBM has a methodical way of approving conference sponsorships. The letter from the Rodneys was received in July.

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18. She approved the check for the purchase order and released the check. Carib would have received the check in August or September.
19. After the check is released, she and the business partner collaborate on the content of session.
20. She and the business partner attended the conference.
21. She has only seen the Rodneys at the conference. She has been invited to other events but has not accepted the invitations.
22. She received a call from Mr. Rodney about the article on the conference.
23. She had no knowledge of the Foundation until this matter.
24. She understood Carib News to be the sponsor.
25. The \$20,000 level of sponsorship is low for IBM in general. However, it is worth the presence and branding for small the small business unit practice.
26. She thought IBM's sponsorship was of the conference, she did not know the Foundation existed until this issue arose. Her department does not give to non-profit organizations, only to businesses.
27. The only parameters placed on the money for the conference was with respect to time slots and length of the sessions.
28. She tells her team her preferences and the team works out the specifics with Carib.
29. She does not recall seeing a specific document that listed the various levels of sponsorship.
30. Carib News provides the framework for the conference. Then she typically tells Carib what she wants and what they will pay. She was aware from the signage that other companies were larger sponsors.
31. She arrived at the conference on Thursday and attended the opening reception. She attended a reception on Friday that was hosted by Citi and a breakout session.
32. She noticed names of entities on the agenda from the web that she knew were not at the conference.

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33. She noted that the agenda also listed her breakout session on Saturday which was inaccurate. Her session was on Friday, so she knew the agenda could not have been the final agenda.
34. She seemed to recall seeing the agenda that was submitted to Standards. She noted that the 12:00pm session was accurate, but that she did not believe that the breakout listed on Saturday was accurate.
35. She attended the Macy's breakfast on Saturday morning because it is a popular event. She noted who was on the breakfast panel and who was not (names were listed on agenda). Michelle Patterson did not speak, Burnice Johnson was not on the panel and she was not sure if she even attended the conference.
36. She saw several of the Members who attended the conference. She was on the same flight as Representative Payne. She spoke to Representative Rangel at the reception. Representative Kilpatrick was on a panel with her. And Representative Thompson road to an off-sight event with her. She was sure that she spoke to Delegate Christensen. And she spoke to Sheila Jackson Lee at the awards night.
37. The off-sight event was held at a separate hotel, it included local talent and a comedienne.
38. She stated that Members did not attend the breakout sessions.
39. She had a conversation with Rep. Thompson regarding the election.
40. She left the conference on Sunday morning by 7:00am.
41. She spoke with her team after the article regarding the conference came out.
42. She also called Mr. Rodney after she saw the article; she stated that he told her that there was an investigation and assured her that he had done all that he was supposed to do and that he wanted to keep her as a sponsor.
43. She understood sponsor to be financial sponsor of the conference. She assumed all of the companies whose logos appeared on the banner were sponsors. She assumed Carib News organized the conference.
44. She was not aware of how funding for the conference was handled. She assumed the payment from IBM went to pay for her breakout session and collateral expenses for the session.

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45. Her registration fee was part of the sponsorship. She paid for her room and all travel costs.
46. There were less than 300 people at the conference.
47. When she registered for the conference, she received a badge that allowed access to buffets during the meetings.
48. The registration fee for the conference in '05 was \$750.00.
49. She was not aware of the '08 registration fee.

Beth Horton
Investigative Counsel

OFFICE OF CONGRESSIONAL ETHICS
U.S. HOUSE OF REPRESENTATIVES

18 U.S.C. § 1001 ACKNOWLEDGEMENT

I have been provided with a copy of the text of section 1001 of title 18, United States Code (popularly known as the false Statements Act) and hereby acknowledge that it applies to any testimony or documents I provide to the Office of Congressional Ethics.

Name: _____

Signature: _____

Date: _____

5/8/08

For Office Use:

Review(s) No. _____

Exhibit 10

Susan A. Sullivan
Verizon Foundation
Director - Strategic Planning & Partnerships



Verizon Foundation
One Verizon Way
Bldg 6, 3rd Flr South
Basking Ridge, NJ 07920

November 25, 2008

Mr. Karl B. Rodney
Chairman & CEO
Carib News Charities, Inc.
7 West 36th Street, 8th Floor
New York, NY 10018

Dear Mr. Rodney:

On behalf of the Verizon Foundation, it is a pleasure to present the enclosed check for \$35,000.00 to Carib News Charities, Inc. in support of the 13th Annual Carib News Multi-National Business Conference - November 6-9, 2008.

Under the Omnibus Budget Reconciliation Act of 1993, Verizon Communications must receive a written receipt from all organizations to which it makes a charitable contribution. Therefore, please complete and return the enclosed form acknowledging this gift within two weeks of receipt.

Verizon Foundation is delighted to support Carib News Charities, Inc. and we wish to thank you and the organization for your dedication and contribution to our communities.

Please recognize our contribution as coming from "Verizon Communications."

Sincerely,

A handwritten signature in cursive script that reads "Susan Sullivan".

SS/ah

Enclosures

cc: Patrick Gaston
Albert Browne

09-3698 0127

VZ-OCE 0001

INVOICE NUMBER	INVOICE DATE	DESCRIPTION	GROSS	DISCOUNT	NET AMOUNT	
0094421-0003084	11/17/2008	005-13TH ANNUAL MULTI-NATIONAL	35,000.00		35,000.00	
Check No. 0002756	Check Date 11/21/2008	Vendor No. 0000011028	Handling Code FN	Total \$35,000.00	0.00	\$35,000.00

Questions? Call 916/357-3270 BU APCRP

PAGE 1 of 1

FOLD ALONG PERFORATED DOTTED LINE & REMOVE CHECK

THIS DOCUMENT CONTAINS MULTIPLE FRAUD DETERRENT SECURITY FEATURES - SEE REVERSE

Wichita Bank National Association
Chicago, IL, NO 22514

Date 11/21/2008

0002756

86-199
531

Verizon
P.O. Box 2200
Folsom, CA 95763-2200
916/357-3270

Thirty five thousand and 00/100 Dollars

PAY CARIB NEWS CHARITIES, INC.
7 WEST 36TH STREET, 8TH FLR.
NEW YORK, New York 10018

\$ 35,000.00

Catherine J. Wilford
VOID SIX MONTHS AFTER ISSUE DATE

®0002756® ®059101561®2079900572609®

SEE REVERSE SIDE FOR OPENING INSTRUCTIONS

Verizon
P.O. Box 2200
Folsom, CA 95763-2200

PREFERRED
FIRST-CLASS MAIL
U.S. POSTAGE PAID
SACRAMENTO, CA
PERMIT NO. 94

CARIB NEWS CHARITIES, INC.
7 WEST 36TH STREET, 8TH FLR.
NEW YORK, New York 10018

09-3698 0128

VZ-OCE 0002

Acknowledgment of Charitable Contribution

IMPORTANT: Please acknowledge the enclosed charitable contribution by completing and returning this form. Donors cannot deduct contributions unless they are acknowledged in this manner and a failure to return this form in a timely manner may make you ineligible for future contributions by Verizon Foundation.

1. I hereby acknowledge the Verizon Foundation 2008 contribution of:
\$35,000.00
for 13th Annual Multi-National Business Conference - November 6-9, 2008.

(or describe property or services other than money received)

Received on (date): _____ Date of check: 11/21/08

2. Please indicate whether or not any goods or services were provided by your organization in consideration for this contribution (e.g., the value of food, beverage, ticket or entertainment at a fundraising event):
Yes _____ No _____

If YES, please describe what was provided and give a good faith estimate of the value to the goods or services, understanding that the amount of the contribution that is deductible as a charitable contribution is limited to the excess of money and the value of property contributed over the value of the goods and services provided by the charity.

Description: _____ Est. Value: \$ _____

3. The information above is provided for the purpose of complying with IRS reporting requirements and is accurate to the best of my knowledge. I understand that penalties may be imposed by the IRS on charities that fail to make the required disclosure or for making a disclosure that is inaccurate or incomplete.

Name: _____

Title: _____

Organization: Carib News Charities, Inc.

Organization Tax I.D.#: 133632050vz

Signature: _____

Date: _____

Please return to:

Anita Coleman-Hunt
Verizon Foundation One Verizon Way, VC63S427
Basking Ridge, NJ 07828

Telephone: 908-559-3516
Fax: 908-630-2660

09-3698 0129

VZ-OCE 0003

Acknowledgment of Charitable Contribution

IMPORTANT: Please acknowledge the enclosed charitable contribution by completing and returning this form. Donors cannot deduct contributions unless they are acknowledged in this manner and a failure to return this form in a timely manner may make you ineligible for future contributions by Verizon Foundation.

1. I hereby acknowledge the Verizon Foundation 2008 contribution of:
\$35,000.00
for 13th Annual Multi-National Business Conference - November 6-9, 2008.

(or describe property or services other than money received)

Received on (date): 11/26/08 Date of check: 11/21/08

2. Please indicate whether or not any goods or services were provided by your organization in consideration for this contribution (e.g., the value of food, beverage, ticket or entertainment at a fundraising event):
 Yes No

If YES, please describe what was provided and give a good faith estimate of the value to the goods or services, understanding that the amount of the contribution that is deductible as a charitable contribution is limited to the excess of money and the value of property contributed over the value of the goods and services provided by the charity.

Description: Registration + Conference Meal Plan Est. Value: \$ 1300.00

3. The information above is provided for the purpose of complying with IRS reporting requirements and is accurate to the best of my knowledge. I understand that penalties may be imposed by the IRS on charities that fail to make the required disclosure or for making a disclosure that is inaccurate or incomplete.

Name: KARL B. RODNEY

Title: PUBLISHER/CEO

Organization: Carib News Charities, Inc.

Organization Tax I.D.#: 133632850vz

Signature:  Date: 12/3/08

Please return to:
Anita Coleman-Hunt
Verizon Foundation One Verizon Way, VC63S427
Basking Ridge, NJ 07920

Telephone: 908-559-3516
Fax: 908-630-2660

09-3698 0130

VZ-OCE 0004

Exhibit 11

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OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re: Representative 1 of the Verizon Foundation
Review #: 09-2567; 09-4403; 09-3698; 09-6333; 09-2222
Date: March 23, 2009
Location: Verizon Offices, Washington, DC
Participants: Leo Wise
Omar Ashmawy
Beth Horton
David Kass, Assistant General Counsel Compliance
James C. Wilson, Vice President and Associate General Counsel Compliance

Summary: Representative 1 of the Verizon Foundation is the President and the Strategic Director for Philanthropy of the Verizon Foundation. He was interviewed pursuant to Reviews 09-2567; 09-4403; 09-3698; 09-6333; and 09-2222. Representative 1 of the Verizon Foundation participated at the 13th Annual Caribbean Multinational Business Conference in 2008. We requested an interview with Representative 1 of the Verizon Foundation and he consented to an interview. Representative 1 of the Verizon Foundation made the following statements in response to our questioning:

1. Representative 1 of the Verizon Foundation was given an 18 U.S.C. § 1001 warning, signed a written acknowledgement of the warning
2. Representative 1 of the Verizon Foundation is currently the President of the Verizon Foundation ("the Foundation") and Strategic Director for Philanthropy. His duties

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involve budget planning and implementation and governance for the foundation. Representative 1 of the Verizon Foundation has significant decision-making authority over grants issued by the foundation. He approves all grants in excess of \$25,000 and all grants funded more than two years in a row. He has been with the foundation and acting as President for the past five years.

3. The Foundation is funded through a corpus donated by Verizon and through public donations under Verizon Reads, a program that is offered as part of customer billing statements. The Foundation approves approximately 2,900 grants (totaling 67 million) through a competitive loan application process. The Foundation's online loan application process has specific approval requirements, including a quarterly "impact report."
4. The Foundation funded the Carib News Foundation for the first time in 2008, the grant was issued to provide funding for the 13th Annual Caribbean Multinational Business Conference ("the Conference"). Representative 1 of the Verizon Foundation approved the Carib News Foundation grant. Representative 2 of the Verizon Foundation was the Foundation's contact person for the Conference. Representative 1 of the Verizon Foundation did not interact with Karl Rodney or anyone at Carib News regarding the Foundation's participation at the Conference. Both Representative 1 of the Verizon Foundation and Representative 2 of the Verizon Foundation attended the conference. Mr. Rodney invited Representative 1 of the Verizon Foundation to speak at the Conference and subsequently applied for a grant from the Foundation.
5. Representative 1 of the Verizon Foundation and Mr. Rodney are both members of the board of the Foundation for the University of the West Indies. The two men interacted at board meetings four times per year. Representative 1 of the Verizon Foundation stated that he may also have spoken to Mr. Rodney 1-2 other times prior to the Conference regarding how the Foundation could showcase its Thinkfinity program. He also stated that he may have spoken to Mr. Rodney once after receiving his letter of invitation for the Conference. He does not recall Mr. Rodney "pitching" the conference to him. Representative 1 of the Verizon Foundation stated that the Foundation would not have participated at the Conference unless he could speak on educational issues. Representative 1 of the Verizon Foundation believed the Conference would be a good opportunity to showcase the Foundation's Thinkfinity program.
6. Mr. Rodney was aware of the Foundation's educational work through his interaction with Representative 1 of the Verizon Foundation at board meetings for the Foundation of the University of West Indies. Representative 1 of the Verizon Foundation stated that while

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he had spoken with Mr. Rodney regarding the Thinkfinity program, he did not make any type of informal commitment to fund the Conference.

7. Representative 1 of the Verizon Foundation believed that there were three levels of sponsorship for the Conference, the highest being \$50,000 and the lowest being \$25,000. However, he does not recall seeing any specific document(s) setting out the different levels of sponsorship. He stated that he was not interested in sponsorship at the \$50,000 level but later decided on a \$35,000 grant donation. When asked what the Foundation received at the Conference for the \$35,000, Representative 1 of the Verizon Foundation stated signage and visibility. Representative 1 of the Verizon Foundation stated that the Foundation often provides such support for conferences, including the NAACP conference and National Urban League Conference.
8. Representative 1 of the Verizon Foundation was provided 3 venues at the Conference to speak about the Thinkfinity program. The Foundation believed participation at the Conference would provide exposure to English speaking Caribbean individuals who have connections to universities in New York.
9. The Foundation is required to issue grants only to 501(c)(3) entities. The Foundation could not make a donation to a corporation. Representative 1 of the Verizon Foundation was somewhat familiar with the Carib News paper; he has been featured in the paper and Verizon has advertised in the paper. Representative 1 of the Verizon Foundation was not aware of Carib News Charities until the entity applied for a grant. He believed Carib News Charities was the same entity as Carib News Foundation. He is not aware of any other work the Carib News Charities/Foundation is involved in other than the conference. Mr. Rodney did not talk about the Carib News Charities/Foundation at board meetings.
10. Representative 1 of the Verizon Foundation arrived at the Conference on Thursday afternoon and departed on Saturday morning. Representative 1 of the Verizon Foundation stated that he went to make his speech and promptly left the event. Representative 1 of the Verizon Foundation spoke 3 times on Friday; he was acknowledge at the welcome event on Friday morning and he participated in a demonstration on Thinkfinity in the afternoon. It is not clear from Representative 1 of the Verizon Foundation's remarks what other time he spoke at the Conference. He was invited to speak on Saturday but he did not feel that an extra day was necessary.
11. Representative 1 of the Verizon Foundation recalled seeing and speaking to Congressman Rangel. The Congressman mentioned Alltel and told him to remind his CEO to keep in mind the needs of the minority community. Representative 1 of the Verizon Foundation

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stated that he had no other contact with Members at the Conference. He did not know Delegate Christenson, Congressman Thompson, Congressman Payne and was not sure whether he saw Congresswoman Kilpatrick (he was not sure who she is). He does recall that one lady stated that she would love to see the Thinkfinity program in her state. Representative 1 of the Verizon Foundation was accompanied by Representative 2 of the Verizon Foundation 90% of the time he was at the Conference; he was not aware of any contact between Representative 2 of the Verizon Foundation and any Members.

12. Representative 1 of the Verizon Foundation received an advance copy of the agenda for the conference. The copy indicated that the Foundation was scheduled for two days of activities. He requested that the Saturday meetings be canceled or moved to Friday. He had not seen the agenda that Mr. Rodney submitted to the Ethics Committee for travel approval. He stated that advance copies of the agenda were common, most organizations provided the same level of detail with other conferences. He believed that he had seen more than one copy of the agenda. The agendas that were sent to him focused on the Foundation's participation and not the entire conference.
13. Representative 1 of the Verizon Foundation was asked if it was typical to have an agenda that listed speakers without identifying their employer/affiliations. He was not sure and didn't remember if the drafts he had seen included his title; he was more concerned with having a sense of what he would be doing at the Conference.
14. Representative 1 of the Verizon Foundation spoke with Mr. Rodney prior to the Conference to cancel the programs he was slated to speak at on Saturday (this was his 3rd call regarding the Conference – 1st call was regarding invitation, 2nd call was to discuss his participation, 3rd was to cancel Saturday programs). Mr. Rodney was receptive to Representative 1 of the Verizon Foundation's request and the Saturday program was cancelled.
15. The Foundation paid all travel expenses for Representative 1 of the Verizon Foundation. He did not see the check the Foundation issued for the Conference or the confirmation letter from Mr. Rodney. Representative 1 of the Verizon Foundation met with Mr. Rodney following the conference at a board meeting for the Foundation for the University of West Indies. He also had breakfast with Mr. Rodney at which time they briefly discussed the Conference. According to Representative 1 of the Verizon Foundation, Mr. Rodney was upset over the New York Post article regarding the Conference. Representative 1 of the Verizon Foundation stated that Mr. Rodney felt the article was misleading and that he had done everything that he was supposed to do

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regarding receiving approval from the Ethics Committee. Representative 1 of the Verizon Foundation stated that he and Mr. Rodney did not spend much time speaking about the matter. He felt that Mr. Rodney wanted him to know that he was diligent about following rules. When asked if he knew what rules Mr. Rodney was speaking about, Representative 1 of the Verizon Foundation stated that he did not know which rules he was referring to.

16. Prior to his work with the Foundation, Representative 1 of the Verizon Foundation was with Government Affairs with Verizon, his former position did not involve lobbying. His position involved Strategic Alliance, he was responsible for working with non-profits across the country. He dealt with policy issues regarding universal service. He did not interact with regulators.
17. Representative 1 of the Verizon Foundation met with Eric Eve with Citi 2-3 weeks prior to our interview, they were both attending a meeting with the head of the NAACP. He did not speak to Mr. Eve about the Conference although they did speak about scrutiny on Citi related to TARP funding. He has not had any contact with the Representative of Citi from Citi.

Beth Horton
Investigative Counsel

OFFICE OF CONGRESSIONAL ETHICS
U.S. HOUSE OF REPRESENTATIVES

18 U.S.C. § 1001 ACKNOWLEDGEMENT

I have been provided with a copy of the text of section 1001 of title 18, United States Code (popularly known as the false Statements Act) and hereby acknowledge that it applies to any testimony or documents I provide to the Office of Congressional Ethics.

Name: _____

Signature: _____

Date: 3/23/09 _____

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Review(s) No. _____

Exhibit 12

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OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re: Representative 2 of the Verizon Foundation
Review #: 09-2567; 09-4403; 09-3698; 09-6333; 09-2222
Date: March 23, 2009
Location: Verizon Offices, Washington, DC
Participants: Leo Wise
Omar Ashmawy
Beth Horton
David Kass, Assistant General Counsel Compliance
James C. Wilson, Vice President and Associate General Counsel Compliance

Summary: Representative 2 of the Verizon Foundation is the National Program Director for the Verizon Foundation and Vice President for Education & Technology for Verizon. He was interviewed pursuant to Reviews 09-2567; 09-4403; 09-3698; 09-6333; and 09-2222. Representative 2 of the Verizon Foundation helped arrange the Verizon Foundation's participation at the 13th Annual Caribbean Multinational Business Conference in 2008; he also accompanied Representative 1 of the Verizon Foundation to the event. We requested an interview with Representative 2 of the Verizon Foundation and he consented to an interview. Representative 2 of the Verizon Foundation made the following statements in response to our questioning:

1. Representative 2 of the Verizon Foundation was given an 18 U.S.C. § 1001 warning, signed a written acknowledgement of the warning

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2. Representative 2 of the Verizon Foundation is currently the National Program Director for the Verizon Foundation ("the Foundation") and Vice President for Education & Training for Verizon. He works on educational literacy and technology innovations for the Foundation, 80% of his time is spent on Thinkfinity. He is the only person with an operational role in the program.
3. Representative 2 of the Verizon Foundation helped arrange the Verizon Foundation's participation at 13th Annual Caribbean Multinational Business Conference ("the Conference") in 2008; he also accompanied Representative 1 of the Verizon Foundation to the event.
4. Representative 2 of the Verizon Foundation reviews repeat grant requests for the Foundation. When asked how the Carib News Foundation request came to his desk he stated that it was a result of conversations with Karl Rodney and Representative 1 of the Verizon Foundation. He was not sure which conversation occurred first. Representative 1 of the Verizon Foundation was invited to speak at the Conference and either simultaneously or immediately after Representative 1 of the Verizon Foundation received the invitation, Representative 2 of the Verizon Foundation spoke with Mr. Rodney.
5. Representative 2 of the Verizon Foundation believes that he spoke with Mr. Rodney in person at a meeting for the Foundation for the University of the West Indies. Mr. Rodney inquired about the application for the grant for the Conference. Representative 2 of the Verizon Foundation recalled Mr. Rodney stating that he had spoke with Representative 1 of the Verizon Foundation and that he believed the Conference would be a good fit for the Foundation and would provide a good opportunity to communicate the Foundation's program Thinkfinity.
6. The Verizon Foundation also supports the Foundation for the University of the West Indies. Representative 2 of the Verizon Foundation has interacted with Mr. Rodney regarding the Foundation for the University of the West Indies.
7. Representative 2 of the Verizon Foundation also had previous interactions with Mr. Rodney at dinner and business meetings related the American Fund and to the publication of articles on the Foundation's Thinkfinity program.
8. Representative 2 of the Verizon Foundation will have been with the Foundation 3 years in October.

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9. Representative 2 of the Verizon Foundation believes he began talking with Mr. Rodney about the Conference sometime in the summer. He spoke with Mr. Rodney about the grant application. He described to Mr. Rodney the cyber grant process and explained what needed to be provided in the grant application. The system requires applicants to be 501 (c)(3) entities.
10. The head of Governance and Compliance for Verizon verifies whether applicant is a registered 501(c)(3). A grant request from a non 501 (c)(3) would be removed from the system; the request would not be forwarded to Representative 2 of the Verizon Foundation. The Foundation's grant approval process is formal. Representative 2 of the Verizon Foundation stated that he could show a specific interest in a proposal but could not give any type of commitment to an applicant.
11. Mr. Rodney would be required to provide a deck of the '07 conference, a description of the purpose of the conference and a tentative agenda for the cyber application.
12. Representative 2 of the Verizon Foundation spoke with Mr. Rodney approximately 8-10 weeks prior to the conference at which time they discussed the level of sponsorship the Foundation was interested in funding.
13. Mr. Rodney described 3 levels of sponsorship to Representative 2 of the Verizon Foundation. Representative 2 of the Verizon Foundation stated that this was typical of corporate sponsorships at other conferences.
14. Mr. Rodney offered the Foundation a \$50,000 sponsorship, which was the gold level. Representative 2 of the Verizon Foundation believes there was also a platinum level at \$75,000. He believes that Mr. Rodney showed him a 2007 deck with 3 levels (platinum at \$75,000, gold at \$50,000, and silver at \$25,000) prior to a scheduled interview of Representative 1 of the Verizon Foundation.
15. Representative 2 of the Verizon Foundation explained to Mr. Rodney that the Foundation wished to negotiate a level of funding other than what was being offered. The amount of \$35,000 was decided upon by the Foundation.
16. When asked what the Foundation would receive for its funding, Representative 2 of the Verizon Foundation stated that they would receive signage but that the Foundation was not specifically interested in a "quid pro quo" reciprocation, the Foundation merely wanted to disseminate information about its Thinkfinity program. Representative 2 of the Verizon Foundation stated that the Foundation does not do business in the Caribbean.

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17. Representative 2 of the Verizon Foundation stated that Representative 1 of the Verizon Foundation made an introductory speech but that he was not sure whether the speech was included in the Foundation's sponsorship level; the speech was not pre-set in the 2007 sponsorship deck.
18. Representative 2 of the Verizon Foundation spoke with Mr. Rodney approximately once a week for 6-7 weeks prior to the conference to discuss Verizon's participation/logistics/capacity for web casts at the conference – contact included phone calls and emails. Contact increased as conference approached.
19. When asked how Verizon decided on \$35,000 sponsorship, Representative 2 of the Verizon Foundation stated that he received a call from the Carib staff regarding the conference. The Foundation was asked to sponsor at the \$50,000 level, a \$35,000 counter-offer was made to Mr. Rodney, which he accepted.
20. Conversations regarding sponsorship levels began about 8-10 weeks prior to the conference with the final dollar figure being determined approximately 2 weeks prior to the conference.
21. Representative 2 of the Verizon Foundation spoke with Patricia with Carib regarding sponsorship, she thought the Foundation was sponsoring at the \$50,000, Representative 2 of the Verizon Foundation explained that the amount was \$35,000. When asked if Karl Rodney was upset with the sponsorship level, Representative 2 of the Verizon Foundation answered that he was not upset.
22. Representative 2 of the Verizon Foundation worked on the conference before Carib submitted application for funding which he stated was not unusual.
23. Representative 2 of the Verizon Foundation stated that he saw early drafts of the agenda prior to the conference, and then saw final draft at conference.
24. An early draft was shared with him in order for him to staff and notify Representative 1 of the Verizon Foundation of his speaking times.
25. He did not recall seeing any affiliation information on the early draft, he believes affiliations might have appeared on final draft. He did ask that any information be included on final draft after reviewing the earlier version.
26. Representative 2 of the Verizon Foundation prepared 2 versions of the Foundation's role at the conference.

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27. The topics for the conference were decided through dialog between himself and Karl Rodney with some prior comments from Representative 1 of the Verizon Foundation. Mr. Rodney was aware of the Thinkfinity program. Representative 2 of the Verizon Foundation suggested web casts.
28. Representative 2 of the Verizon Foundation thought that Representative 1 of the Verizon Foundation and Mr. Rodney framed the Foundation's participation at the conference.
29. Town Hall event was Mr. Rodney's idea.
30. Representative 2 of the Verizon Foundation believes that Mr. Rodney was trying to bring together various corporate interests to create a dialogue about social and economic issues that would benefit both the Caribbean and the U.S.
31. Representative 2 of the Verizon Foundation stated that Carib News Foundation was the only charitable entity that he was aware of, it was the listed entity in the grant application.
32. The question arose as to who sponsored conference, Representative 2 of the Verizon Foundation stated that he was aware that Carib News was a for-profit entity, so he asked who was the sponsor. If the sponsor was Carib News, the Foundation could not participate as a sponsor.
33. Representative 2 of the Verizon Foundation stated that he did not see the check that went to the Conference, it would have been generated and sent through the internal system.
34. Representative 2 of the Verizon Foundation did not recall seeing the name Carib News Charities Inc.
35. Representative 2 of the Verizon Foundation saw an early draft of the grant application but does not recall seeing the final version. He was not responsible for final approval.
36. Kathy Browne, Senior VP for Corporate Responsibility would have approved the grant.
37. Representative 2 of the Verizon Foundation spent 2.5 days at the conference, he arrived on Thursday evening, participated at the conference on Friday and departed on Sunday.
38. Representative 2 of the Verizon Foundation and Representative 1 of the Verizon Foundation participated in the welcome remarks on Friday morning, the plenary session, and in a roundtable meeting with educational ministers.
39. Mr. Rodney arranged these meetings, the webcast did not take place.

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40. Representative 2 of the Verizon Foundation did not attend the conference on Saturday or Sunday. He also left the hotel after the Foundation completed its presentations.
41. When asked about the Town Hall meeting, Representative 2 of the Verizon Foundation stated that Karl Rodney suggested that the Foundation speak about the Thinkfinity program, the opening remarks framework was also suggested by Mr. Rodney, Mr. Eve was to give introductory remarks and then Representative 2 of the Verizon Foundation was to speak.
42. There was a back and forth discussion about the plenary session between Representative 2 of the Verizon Foundation and Mr. Rodney to determine what role the Foundation would play in conjunction with the President of Medgar Evers College. The topic was technology supporting education.
43. There was no discussion regarding scheduling sessions to benefit US companies.
44. Representative 2 of the Verizon Foundation stated that he did not have any contact with Members of Congress other than a possible introductory handshake.
45. Representative 2 of the Verizon Foundation saw Representatives Kilpatrick, Rangel and the former head of the NAACP at the conference, along with other governmental officials from other countries. He also recalled seeing Delegate Christensen and Representative Payne. Representative 2 of the Verizon Foundation did not know Representative Thompson.
46. Representative 2 of the Verizon Foundation interacted with Mr. Rodney after the conference to discuss the American Fund and the University of the West Indies. He did not discuss the conference with Mr. Rodney.
47. Representative 2 of the Verizon Foundation believes that he may have received a thank you letter from Mr. Rodney for participating at the conference.
48. He did not see the contribution-sponsorship letter.
49. Representative 2 of the Verizon Foundation was aware of Mr. Rodney's Foundation, and the fact that it sponsored the conference. He also believed Mr. Rodney's Foundation performed social work for boys and girls club events and that it worked with the American Fund for the University of the West Indies. He was not sure why he felt that Rodney's Foundation was involved with these other events.

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50. Representative 2 of the Verizon Foundation stated that the Foundation did not place any restrictions on the funding it provided to the conference through its grant, the use would have been specified in the grant application/guidelines

Beth Horton
Investigative Counsel

OFFICE OF CONGRESSIONAL ETHICS
U.S. HOUSE OF REPRESENTATIVES

18 U.S.C. § 1001 ACKNOWLEDGEMENT

I have been provided with a copy of the text of section 1001 of title 18, United States Code (popularly known as the false Statements Act) and hereby acknowledge that it applies to any testimony or documents I provide to the Office of Congressional Ethics.

Name: _____

Signature: _____

Date: 3/23/09

For Office Use:

Review(s) No. _____

Exhibit 13



Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10018
Tel: (212) 944-1991; Fax: (212) 944-2089
E-mail: info@caribnewsconference.com

April 04, 2008

Ms. Marilyn Johnson
VP Marketing Development
IBM Corporation
1133 Westchester Avenue
White Plains, NY 10604

*Copy of [unclear]
- copy of [unclear]
- copy of [unclear]*

Dear Ms. Johnson:

For the past twelve years, the annual Caribbean Multi-National Business Conference has been instrumental in encouraging investment, cross-border trade and business partnerships, the role played by executives of major corporations, medium and small-size businesses and entrepreneurs, and deepens the connections with key elected officials.

Your support and that of IBM went a long way to make the conference a success, and has fostered on-going growth in business achievements and impactful policy decisions. We appreciate very much the professionalism and enthusiasm you bring to the Conference with your keen participation. The presence and demonstration of real live "IBM Partner" as a result of the conference is a powerful testimony. We do get concrete results and expressed appreciation of new opportunities.

We can assure you that all the key stakeholders, Members of Congress, Heads and Ministers of Government, Elected Officials, Community and Business Leaders are all aware and appreciative of IBM's participation in this very important mission.

This year, the Thirteenth Annual Conference is scheduled to be held in St. Maarten, November 6 - 9, 2008, and promises to further strengthen and expand on the work done by many of the Caribbean countries developing economies, in collaboration with the emerging markets initiatives in the U.S. The quality of the sessions and the high level of participation is now legendary, and is anxiously awaited each year.

Enclosed is a Power Point presentation of the sponsorship opportunities the Conference provides, and also a program and recap of the 2006-2007 Conference. We know of your interest to deepen the IBM local, regional and global connection, and I know the Conference can achieve that. It is our sincere wish that this presentation motivates your sponsorship.

3

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IMB TO US 09:37p

V.L. MCKENZIE

11/21/2000

107

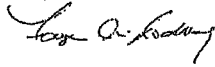
- 2 -

We would be happy to answer any questions you might have or to fill in any detail. I can be reached by e-mail: KBRodney@nycaribnews.com or (212) 944-1991.

Because we know of your busy schedule, I will also follow up with your office to ascertain interest level.

Thanks for your kind consideration.

Best regards,



Faye A. Rodney
President



Karl B. Rodney
Publisher/CEO

(4)

WEST TO US 04/30/08

NY, N.Y. 10001/0120

11/16/2008

PA

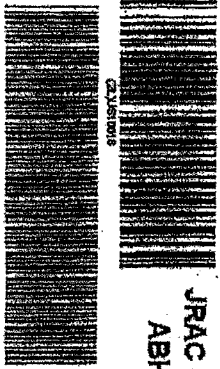
CARIB NEWS INC.
7 WEST 36TH STREET
8TH FLOOR
NEW YORK, 10018
212-944-1991

Invoice

Date	Invoice #
7/16/2008	45122

Bill To
Wanda McKenzie IBM 2607 Justice Court Marietta, GA 30068

Description	Amount
Sponsorship Multi-National Business Conference 2008 TAX ID 13-362060	20,000.00
(6)	
Total	\$20,000.00

 <p>CAUTIONS</p> <p>WAVBLLI 228725558</p> <p>(Non-Hazardous)</p>		<p>EXP 1M</p> <p>ORIGINE ILE</p> <p>POSTCODE 10018</p> <p>TEL: 212-944-1091</p>
<p>FR: 18 WILCO THOUL 018</p> <p>CO. JACOB A. LOGISTICS</p> <p>1400 BURNETT RD</p> <p>ALBANY, NY 12212</p> <p>TO: HENT FOUZ / JACOB A. LOGISTICS</p> <p>FATE RODNEY</p> <p>7 WEST 38TH STREET, 6TH FLOOR</p> <p>NEW YORK, NY 10018</p> <p>UNITED STATES</p>		<p>DESCRIPTION: IBM CARD</p> <p>WEIGHT: 1.000</p> <p>DATE: 2009-09-08</p> <p>ORIGINE: (Non-Hazardous)</p>

International Business Machines Corporation
New York, NY 10017-8883

DATE: 2009/09/08

NEW YORK-CARIB NEWS
7 W 38TH ST 6TH FL
NEW YORK NY 10018
UNITED STATES

Pay \$ 20,000.00**

Per *Richard Carroll*
Authorized signature

0003777521 202130937946018 25847*

7

Exhibit 14

05/15/2009 17:20 FAX

002

May 15, 2009

MEMORANDUM

VIA FAX TO: 202-226-0997

TO: Omar Ashmawy
FROM: Will Ris

RE: Materials related to Carib News Foundation Conference

At your request, I am faxing you the following documents:

1. The original letter of request for support from Carib News Foundation sent to American Airlines. I assume that they sent the identical letter to other airlines because in paragraph 3, they refer to "Continental" when it should be "American". In any case, they requested a total of 95 tickets for this event. We responded orally and told them the maximum we could provide would be 10.
2. A listing of the 10 tickets that we provided. If you need more detailed records of each individual ticket, I am happy to provide it. But this shows the names and itineraries of all 10 travelers. We provided no other support for the conference except that our group sales office authorized a standard 5 percent discount on tickets for those travelling to the conference -- this is universally available to any group of 10 or more travelling to the same location.

If there is anything else I can help you with, please let me know.

09-3698 0153

05/15/2008 17:20 FAX

003



Carib News Foundation
 7 West 36th Street, 8th floor, New York, NY 10018
 Tel: (212) 944-1991; Fax: (212) 944-2089
 E-mail: info@caribnewsconference.com

June 6, 2008

Mr. Will Ris
 Senior Vice President
 Government Affairs
American Airlines
 1101 17th Street, Suite 600
 Washington, DC 20036

(10 First)

Dear Mr. Ris:

For the past twelve years, the annual Caribbean Multi-National Business Conference has been instrumental in encouraging investment, cross-border trade and business partnerships, the role played by executives of major corporations, medium and small-size businesses and entrepreneurs, and deepens the connections with key elected officials.

This year, the Thirteenth Annual Conference is scheduled to be held in St. Maarten, November 6 - 9, 2008, and promises to further strengthen and expand on the work done by many of the Caribbean countries developing economies, in collaboration with the emerging markets initiatives in the U.S. The quality of the sessions and the high level of participation is now legendary, and is anxiously awaited each year.

Since Air Transportation is such a vital issue for the Caribbean Region, it is going to be one of the Agenda items in the travel & Tourism sector. Continental's success is vital to the Caribbean region and the US role in world travel; we would expect significant input into any initiatives discussed.

We expect to have elected officials of the US and the Caribbean, Civic Leaders and Business- persons who can influence policies and encourage worthwhile initiatives to be at the Conference. We would welcome American Airlines' participation.

The Host Committee in the Caribbean Region and the Planning Committee in the US have all agreed to honor you with the Conference's prestigious *Marcus Garvey Bridge Builders Award*. Should you agree to accept, we would ask Congressman Charles Rangel and Congresswoman Eddie Bernice Johnson to make the presentation to you.

We are open to our customary barter of tickets for sponsorship levels, and have enclosed a proposed arrangement guide similar to last year.

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09-3698 0154

05/15/2009 17:20 FAX

004

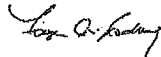
Enclosed is a Power Point presentation of the sponsorship opportunities the Conference provides, and also a program and recap of the 2006-2007 Conference. It is our sincere wish that this presentation motivates your sponsorship.

We would be happy to answer any questions you might have or to fill in any detail. I can be reached by e-mail: KBRodney@nycaribnews.com or (212) 944-1991.

Because we know of your busy schedule, I will also follow up with your office to ascertain interest level.

Thanks for your kind consideration.

Best regards,



Faye A. Rodney
President



Karl E. Rodney
Publisher/CEO

05/15/2009 17:20 FAX

005

We are expecting about 20 Members of Congress or more who will be attending along with other Civic Leaders and VIP's. Again, we will position American Airlines as one of the main carriers to the Caribbean transporting the elected officials and celebrities. To help us move the process along we would like to propose the following, that American Airlines participate as a Gold Sponsor of the conference in consideration for which American Airlines would receive the following:

- American Airlines will be recognized as a main sponsor.
- American Airlines name and logo will be included on all printed material.
- American Airlines will be included in all radio and television promotions.
- American Airlines will be in all Internet promotions.
- American Airlines will be a designated sponsor of a main event and/or a workshop with speaking opportunities.
- American Airlines will receive prominent space for display or exhibition.
- American Airlines banners will be displayed in the main conference area.
- American Airlines can develop specific promotional materials.

In return for the above, American Airlines will provide *Carib News* with:

- Maximum of fifty (50) roundtrip coach class tickets from the 48 contiguous United States to Antigua. Reservations to be done by *Carib News* and ticketing to be by American Airlines.
- Maximum of thirty-five (35) first-class roundtrip tickets from the 48 contiguous United States to Antigua.
- Maximum of five (5) coach class tickets and five (5) first class tickets to be used for site inspection and conference planning prior to the conference.
- American Airlines will provide group fares for registered attendees. Fare and reservations & ticketing to be negotiated by American Airlines.

Site Inspection is part of the sponsorship package. We do plan to do site inspections in St. Maarten when we will officially announce the Conference and work out broad issues.

Exhibit 15

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311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2006	Year-End	Caine, Christopher
311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2006	Year-End	Caine, Christopher
311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2006	Year-End	Caine, Christopher
311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2007	Mid-Year	Caine, Christopher
311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION	INTERNATIONAL BUSINESS MACHINES CORPORATION	2007	Year-End	Caine, Christopher

311230000	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2007	Mid- Year	Caine, Christopher
311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2007	Mid- Year	Caine, Christopher
311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2008	1st Quarter	Caine, Christopher
311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2008	2nd Quarter	Caine, Christopher
311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2008	3rd Quarter	Caine, Christopher
311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2008	4th Quarter	Caine, Christopher
311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2009	1st Quarter	Edington, PJ
311230000	International Business Machines Corporation (IBM)	International Business Machines Corporation (IBM)	2005	Year- End	Caine, Christopher
401290000	QA Internal Test - New Database IBM	QA Internal Test - New Database IBM	2008	1st Quarter	None
401290000	QA Internal Test - New Database IBM	QA Internal Test - New Database IBM	2008		Last Name 01, First Name 01
401290000	QA Internal Test - New Database IBM	QA Internal Test - New Database IBM	2008	3rd Quarter	None

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310520000	CITIGROUP, INC	CITIGROUP, INC	2006	Year-End	Burgeson, Christine
310520000	CITIGROUP, INC	CITIGROUP, INC	2007	Mid-Year	Burgeson, Christine
310520000	CITIGROUP, INC	CITIGROUP, INC	2007	Year-End	Burgeson, Christine
310520000	CITIGROUP, INC	CITIGROUP, INC	2007	Year-End	Burgeson, Christine
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2007	Mid-Year	None
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2007	Year-End	None
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2008	1st Quarter	None
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2008	2nd Quarter	None
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2008	3rd Quarter	None
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2008	4th Quarter	None
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2006	Year-End	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2007	Mid-Year	Snyder, John

316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2007	Year-End	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2008	1st Quarter	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2008	2nd Quarter	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2008	3rd Quarter	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2008	4th Quarter	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2009	1st Quarter	Snyder, John
373770000	CITIZENS FINANCIAL GROUP, INC.	CITIZENS FINANCIAL GROUP, INC.	2007	Mid-Year	Robinson, Ken
373770000	CITIZENS FINANCIAL GROUP, INC.	CITIZENS FINANCIAL GROUP, INC.	2007	Year-End	Robinson, Kenneth

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315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2006	Year-End	Davidson, Peter B.
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2007	Mid-Year	Davidson, Peter B.
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2007	Year-End	Davidson, Peter
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2008	1st Quarter	Davidson, Peter
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2008	2nd Quarter	Cantrel, Frank
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2008	3rd Quarter	Cantrel, Frank
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2008	4th Quarter	Davidson, Peter
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2009	1st Quarter	Cantrel, Frank
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2006	Year-End	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2007	Mid-Year	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2007	Year-End	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2008	1st	

09-3698 0163

Contributor ID	Contributor Name	Company	Year	Quarter	Recipient Name
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2008	2nd Quarter	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2008	3rd Quarter	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2008	4th Quarter	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2009	1st Quarter	Brittingham, Donald
315720000	Verizon & its affiliates, except Verizon Wireless	Verizon & its affiliates, except Verizon Wireless	2005	Year-End	Davidson, Peter
315720000	Verizon & its affiliates, except Verizon Wireless	Verizon & its affiliates, except Verizon Wireless	2006	Mid-Year	Davidson, Peter
352050000	Verizon Wireless	Verizon Wireless	2005	Year-End	Azare, Monica
352050000	Verizon Wireless	Verizon Wireless	2006	Mid-Year	Azare, Monica

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Exhibit 16



BASIC REQUIREMENTS
TO HOST

CARIBBEAN MULTINATIONAL BUSINESS CONFERENCE

- * Invitation to host conference to be issued by Prime Minister (Head of Government). This is to facilitate the attendance of several elected officials from the United States, United Kingdom and other countries.
- * Prime Minister to be keynote speaker at one of the major events of the conference and participate in the closed door session with attending elected officials.
- * Local host committee to be organized with all interested ministers, agencies and associations. The chairman of this committee would be someone designated by the Prime Minister to coordinate all the activities.
- * To provide the care and comfort for the VIP's attending i.e.
 - o To provide 25 all-inclusive rooms for the VIP's and members of Congress attending
 - o To provide appropriate mode of transportation for VIP's and members of Congress - cars or specialized vans - not buses
- * To be a designated sponsor in one of the categories: *Title, Main or Regular Sponsor* (See Attachment)
- * To organize a "Host Country Evening" - The Friday evening, the host country will host at an appropriate location an evening of food, refreshment, cultural presentation and entertainment.
- * Provide for local entertainment for the various functions:
 - o The Opening Ceremonies
 - o The Reception
 - o The Gala Dinner
- * To assist in Promotion and Publicity of the conference both locally and through international offices and official publications.
- * Assist in securing competitive hotel rates.
- * Equip and staff conference secretariat.
- * Prime Minister to issue invitations along with CARIBBEAN NEWS to members of the US Congress, other Prime Ministers and Ministers of Government.
- * Participate in the Forum with Members of Congress.
- * Arrange tours and activities of interest for VIP's and/or their spouses.

09-3698 0166

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THE NEW YORK
CARIBNEWS
 THE WEEKLY VOICE OF THE CARIBBEAN-AMERICAN COMMUNITY
 73 WEST 36TH STREET, NEW YORK, NY 10018 (212) 244-1991

August 13, 2008

The Hon. Sarah A. Wescott-Williams
 Leader of Government
 Government Administration Building
 Clam Labege Square, Phillipsburg
 St. Maarten, N.A.

Hon. Commissioners:

Plans are moving ahead for the Thirteenth Annual Caribbean Multi-national Business Conference, November 6-9, in your beautiful country. We have sent out invitations to several Members of Congress, Prime Ministers, Presidents and Premiers, to attend the Conference. A list of those invites is attached. Senator Hillary Clinton has expressed an interest and her invitation will be forwarded soon. Also see Congressman Rangel's personal note of acceptance.

We wish for you now to send out your invitation to those individuals as previously discussed. A copy of past invitation letter is included. We will continue to do all the follow-up as planning and implementation as agreed to.

We are working on the draft of the program and will be sharing it with you and the Host Committee shortly. We would like to schedule our first Conference meeting by telephone with the Host Committee within the next 10 days, to start going over each area of the basic requirements list, and to develop some time-line and contact person for each area.

We need to know immediately who on the Host Committee will be handling press and publicity, we can start sending Press Releases and Press updates.

We will be sending regular updates.

Kindest Regards



Karl B. Rodney
 Publisher/CEO

cc. Commissioner Roy Marlin
 Director of Tourism, Regina LaBega
 Marla Chemont



Taking Our Rightful Place In The Sun

09-3698 0167

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Carib News Foundation
 7 West 30th Street, 3rd floor, New York, NY 10001
 Tel (212) 644-3999; Fax (212) 644-2089
 E-mail: info@caribnews.org

June 26, 2008

Commissioner Sarah Wescot-Williams
 Leader of Government Business
 Government Administration Building
 Olofin Labega Square
 Philipsburg, St. Maarten, NA

Dear Commissioner Wescot-Williams:

Plans are coming in place for the Thirtieth Annual Caribbean Multi-national Business Conference scheduled for November 8-9 at your invitation to the beautiful country of St. Maarten.

We were very involved with the Conference on the Caribbean held in New York last week with some fifteen Heads of CARICOM Governments, which was a success, but took a large part of our time. All attention is now set for St. Maarten.

We have signed the contract with the Malic Resort and we are in conversation with many of our sponsors. Already we have some important names agreeing to come, including Congressman Charles Rangel and Governor of New York, David Paterson. We are mindful of the issues of interest to St. Maarten and so we have issued invitations to several Members of Congress, Heads of Education and Health Institutions. A strong financial sector is expected, already Citibank and HSBC are on board.

There is very strong interest in the conference and all the information about the conference as St. Maarten is now on the website, in print and on radio. The promotion has begun in earnest.

We would now wish to start liaison with the local host committee to coordinate our planning with yours. Could you be kind enough to please identify the committee and the contact person and other information. We would wish that the person would report to you directly or Commissioner Martin to expedite any matter.

Please find attached ideas for the Theme and some areas of concentration from which we can develop the program. The Host Committee should use the basic requirement as the basis for their planning. We will send a matrix of some time line and arrange for our next planning visit.

Organized by Carib News Foundation. A non-profit project 501-C3 corporation

09-3698 0168

ON 000045

2008 CARIBBEAN MULTI-NATIONAL BUSINESS CONFERENCE**THEMES**

We are suggesting as possible themes, the following.

Please feel free to change, adjust or even, new approaches.

CHANGING STRATEGIES TO EMBRACE NEW POSSIBILITIES - THE GLOBAL MARKET**MOVING BEYOND BARRIERS TO A STRATEGY FOR GLOBAL COMPETITIVENESS****CHANGING STRATEGIES, BUILDING ALLIANCES, FACING NEW REALITIES****A REGION IN TRANSITION - STRATEGIES FOR CHANGE, ALLIANCE FOR PROGRESS****AREAS OF CONCENTRATION**

We are also now shaping the presentations and the workshops and the areas of concentration are some of which were suggested by yourself and Commissioner Martin.

1) TOURISM

- Rec. clearance
- Unfunded mandate by the US
- Investment in Tourism
- Health tourism
- Regional co-operation

2) HEALTH

- St. Maarten, ideal location for Regional Health Center
- Delivery of health care
- Lifestyle diseases - diabetes, hypertension, obesity
- Health investment
- Collaboration with US institutions

3) EDUCATION

- Collaboration with US institutions
- Curriculum development
- Presentation of Thinkfinity - high tech tool for teaching
- Initiative between the University of the West Indies and Medgar Evers College

09-3698 0169

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Carib News Foundation
7 West 20th Street, 8th floor, New York, NY 10011
Tel: (212) 944-3991, Fax: (212) 944-2089
E-mail: info@caribnewsconference.com

To : Host Committee
Caribbean Multi-National Business Conference
cc: Bernard Hunt, Sonesta Maho Beach Resort

From : Karl B. Rodney
CARIB NEWS

Date : October 15, 2008

SUBJECT : Town Hall Meetings

In the interest of organizing successful Town Hall Meetings, and to make program print deadline, we suggest the use of the space available at the Sonesta Maho for those meetings.

We think the participation of the local groups and individuals in these meetings are necessary and productive because of the subject matter. We would therefore urge a strong outreach media program and direct contact to interest groups to ensure success of the FORA.

- Thursday 5:00 - 6:30pm : Healthy Eating and Living
- Friday 4:30 - 6:00pm : Education - Sharing Working Solutions
- Saturday 4:30 - 6:00 pm : Technology

There is a great line up and we may have some additional star power. Commissioner Sarah Wescoat-Williams also suggested she might have additional local speakers for these for a, and we welcome that.

Thanks for your kind cooperation.

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 7 West 56th Street, 8th Floor, New York, NY, 10017
 Tel: (212) 944-9901, Fax: (212) 944-2089
 E-mail: info@caribnewsfoundation.com

February 8, 2008

Commissioner Sarah Wescoe Williams
 Leader of Government Business
 Government Administration Building
 Clem Labega Square
 Philipsburg, St. Maarten, NA

Dear Commissioner Wescoe Williams:

It is with great pleasure that I wish to inform you that the Planning Committee has selected St. Maarten to host the Thirteenth Annual Caribbean Multi-National Business Conference, November 6-9, 2008. There was great interest in St. Maarten because of your personal invitation issued in Antigua, and certainly all the other excellent facilities on the island.

We look forward to a great conference and with working with you and your team. We would wish that you appoint the Host Committee as soon as possible so that the real planning will begin. We will be proposing some thematic approaches for your consideration, in order to get the right participants and targeted focus.

We have the proposal from the hotels and will be making that selection within the week, after which we can start the promotion. The **SAVE THE DATE** and **VENUE** will be going out to the Members of Congress shortly. We will develop a fine line for the other activities.

We are proceeding with the plan and would appreciate the formal letter of invitation.

We are very excited about working with you and St. Maarten again, and we expect a great conference!

Congratulations, and thank you for your kind consideration.

Very Truly Yours,

Faye A. Rodney

President

Karl B. Rodney
 Publisher/CFO

cc. Marla Chemont, Marketing Assistant

Organized by Carib News Foundation, A non-profit project 501-C3 corporation

09-3698 0171

CONFIDENTIAL



Carib News Foundation
 7 West 20th Street, 8th floor, New York, NY 10011
 Tel: (212) 944-9999 Fax: (212) 944-2089
 E-Mail: info@caribbeanconference.com

January 23, 2008.

Commissioner Sarah Wescot-Williams
 Leader of Government Business
 Government Administration Building
 Clem Labega Square
 Philipsburg, St. Maarten, NA

Dear Commissioner Wescot-Williams:

Thanks very much for inviting us to St. Maarten to explore the possibility of St. Maarten as the Host Venue for the Thirteenth Annual Caribbean Multi-National Business Conference, scheduled for November 6-9, 2008.

We had the pleasure of meeting with Commissioner Rby Marlin to discuss the conference, its mission and of course, St. Maarten's priorities to be addressed in the conference. Among the areas discussed were:

- * The Passport issue and its impact on St. Maarten and the Caribbean.
- * The US Pre-clearance option and what are the possibilities.
- * Educational collaboration and in-state tuition consideration for students from St. Maarten.
- * A major women's initiative at the conference and targeting many large sponsors to hold meetings and conventions in St. Maarten.
- * The influence on impact of the Congressional delegation on the current constitutional negotiations with the Dutch Government, particularly where the Dutch Government has lobbied these Members on their special interests.
- * An appealing or special role model to address the youth of St. Maarten.
- * To conduct community outreach programs involving the wider population in the areas of Health, Education and possibly Technology.

These are areas that we can establish direct linkages with elected officials, professional experts, corporate perspectives and certainly business opportunities.

We were reminded by Ludwig Ouarniche the then President of the Chamber of Commerce, that it was in St. Maarten that the issue of increase of Duty Free Allowance was raised and was subsequently raised to twice the amount within six months, benefiting all the merchants not only in St. Maarten but the Caribbean.

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Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10018
Tel: (212) 944-1991; Fax: (212) 944-2089
E-mail: info@caribnewsconference.com

*Copy of your
- copy of book
- copy of photo*

April 04, 2008

Ms. Marilyn Johnson
VP Marketing Development
IBM Corporation
1133 Westchester Avenue
White Plains, NY 10604

Dear Ms. Johnson:

For the past twelve years, the annual Caribbean Multi-National Business Conference has been instrumental in encouraging investment, cross-border trade and business partnerships, the role played by executives of major corporations, medium and small-size businesses and entrepreneurs, and deepens the connections with key elected officials.

Your support and that of IBM went a long way to make the conference a success, and has fostered on-going growth in business achievements and impactful policy decisions. We appreciate very much the professionalism and enthusiasm you bring to the Conference with your keen participation. The presence and demonstration of real live "IBM Partner" as a result of the conference is a powerful testimony. We do get concrete results and expressed appreciation of new opportunities.

We can assure you that all the key stakeholders, Members of Congress, Heads and Ministers of Government, Elected Officials, Community and Business Leaders are all aware and appreciative of IBM's participation in this very important mission.

This year, the Thirteenth Annual Conference is scheduled to be held in St. Maarten, November 6 - 9, 2008, and promises to further strengthen and expand on the work done by many of the Caribbean countries developing economies, in collaboration with the emerging markets initiatives in the U.S. The quality of the sessions and the high level of participation is now legendary, and is anxiously awaited each year.

Enclosed is a Power Point presentation of the sponsorship opportunities the Conference provides, and also a program and recap of the 2006-2007 Conference. We know of your interest to deepen the IBM local, regional and global connection, and I know the Conference can achieve that. It is our sincere wish that this presentation motivates your sponsorship.

③

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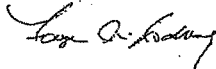
- 2 -

We would be happy to answer any questions you might have or to fill in any detail. I can be reached by e-mail: KBRodney@mycaribnews.com or (212) 944-1991.

Because we know of your busy schedule, I will also follow up with your office to ascertain interest level.

Thanks for your kind consideration.

Best regards,



Faye A. Rodney
President



Karl B. Rodney
Publisher/CBO

Exhibit 17

Registration

From: plouis (plouis@caribbeannews.com)
Sent: Monday, October 15, 2007 11:00 AM
To: 'Kelly Mobley, Dawn'
Subject: RE: Carib News - Pre-Trip Approval Issues

Ms. Olson,
In response to your e-mail, the answer to your question is NO.
Regards and Thanks for your patience.

Patricia Louis
Executive Assistant
CARIB NEWS
7 West 38th Street, 8th Floor
New York, NY 10018

-----Original message-----
From: Kelly Mobley, Dawn (mailto:Dawn.KellyMobley@mail.house.gov)
Sent: Monday, October 15, 2007 10:26 AM
To: plouis
Subject: RE: Carib News - Pre-Trip Approval Issues

FYI

From: Olson, Susan
Sent: Friday, October 12, 2007 2:41 PM
To: plouis
Cc: Kelly Mobley, Dawn; O'Kelly, Bill
Subject: RE: Carib News - Pre-Trip Approval Issues

Ms. Louis,

Please explain in more detail your email message below relative to the "sponsors contribute to the overall expense of the trip." In this regard, do the following entities pay for any of the expenses of the trip for the invited House Members, including roundtrip air transportation costs, lodging costs, meal costs, cost of a particular meal or reception, etc.?

- o Antigua Government
- o Sandals
- o Royal Caribbean Bakery
- o CITI
- o Pfizer
- o Macy's
- o AT&T
- o HSBC
- o IBM

10/15/2007

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- o Goodworks International
- o Preferred Health Partners
- o Antigua & Barbuda
- o American Airlines
- o Golden Krust

Susan L. Olson

Counsel

House Committee on Standards of Official Conduct

HT-2, The Capitol Building

Washington, DC 20515

Phone: 202-225-7103

Fax: 202-225-7392

From: plous [mailto:plous@nycaribnews.com]
 Sent: Thursday, October 11, 2007 10:37 AM
 To: Olson, Susan
 Subject: RE: Carib News - Pre-trip Approval Issues

Ms. Olson,

In response to your e-mail:

The sponsors contribute to the overall expense of the trip and the general work of the Foundation.

As a courtesy, each contributor is given an opportunity to be attached to a part of the program

that is being presented. They do not determine the content of the other participants in the Conference.

Federally registered lobbyists or foreign agents will not be accompanying the Members or participating in the program.

Regards,

Patricia Lohb
 Executive Assistant
 CARIB NEWS
 7 West 38th Street, 8th Floor
 New York, NY 10018

----- Original Message -----
 From: Olson, Susan [mailto:Susan.Olson@mail.house.gov]
 Sent: Wednesday, October 10, 2007 4:01 PM
 To: plous@nycaribnews.com
 Cc: Dawn Kelly-Mobley@mail.house.gov; O'Reilly, Bill

10/15/2007

09-3698 0177

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Subject: Caribbean - Pre-trip Approval Issues

Dear Mrs. Louis:

With regard to the pre-trip approval requests for the Carib News Foundation's (Foundation's) trip to Antigua, the issues involving sponsorship are as follows:

While the sponsor form that you completed indicates that the Foundation is the sole sponsor of the 2007 trip, the draft schedule, however, indicates that the following entities are "sponsoring" sessions, events, etc. during this trip:

- a. Antigua Government
- a. Sandals
- o Royal Caribbean Bakery
- a. CFI
- o Pfizer
- o Macy's
- o AT&T
- o HSBC
- o IBM
- o GoodWorks International
- o Preferred Health Partners
- o Antigua & Barbuda
- o American Airlines
- o Golden Krust

Last year the Foundation provided the following information regarding these "additional sponsors" for the November 9 to 12, 2006 trip:

The Foundation, which is a 501(c)(3) nonprofit organization, will be paying for the Members' travel expenses including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a "contribution to the overall pool of expenses in contribution to the Foundation," which is used to "underwrite the overall expenses of the Conference," primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organization who will be attending and participating in the Conference.

Accordingly, the Committee's Advisory Opinion, dated October 27, 2006, provided that all of the organizations that provided financial underwriting for the trip along with the Foundation were required to be listed as the "trip sponsors" on the participating Members' post-travel disclosure form and their 2006 annual financial disclosure statements.

Accordingly, you need to provide information describing the role of these "additional sponsors" as listed in the 2007 trip draft schedule for this current trip. Without such information, I cannot proceed with the review of the pre-trip approval requests for the Foundation's Antigua trip.

10/15/2009

09-3698 0178

CONFIDENTIAL

Susan L. Olson

Counsel

House Committee on Standards of Official Conduct

RT-2, The Capitol Building

Washington, DC 20515

Phone: 202-225-7103

Fax: 202-225-7392

10/15/2007

09-3698 0179

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THE NEW YORK CARIBNEWS
 THE WEEKLY VOICE OF THE CARIBBEAN-AMERICAN COMMUNITY
 1 WEST 10TH STREET 4TH FLOOR, NEW YORK, NY 10011

TELE: (212) 944-1921, FAX: (212) 944-2089
 E-MAIL ADDRESS: NYCARIB@AOL.COM,
 CARIBNEWS@ATT.NET

FACSIMILE TRANSMITTAL SHEET	
TO:	FROM:
Susan Olsen	R. Louis
COMPANY:	DATE:
Hines Case of Standards	10/13/07
FAX NUMBER:	TOTAL NO. OF PAGES INCLUDING COVER:
202-225-7392	
RE: Travel Conference in Fortia	

URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY YOUR INFORMATION

Ms. Olsen,
 In response to your e-mail - the Conference is paid for by CARIB NEWS FOUNDATION.

The companies are participants. They are not sponsors or co-sponsors for any part of the trip and play no role in the planning or content.

The program has been amended to reflect the companies as Participants.

I regret the misunderstanding and thank you for your patience as I go through and grow through this process, which is new to me.

I look forward to hearing from you.

Regards

09-3698 0180

CONFIDENTIAL

Registration

From: Kelly Mobley, Dawn (Dawn.KellyMobley@mail.house.gov)
Sent: Friday, October 12, 2007 1:55 PM
To: plouls
Subject: RE: Confidential

The fax did not come through. I will be stepping out of the office for the remainder of the day, but will be in early Monday. Please follow up again with Susan. I have explained that the organizations you labeled as co-sponsors are not. They support your foundation annually, but have not and will not pay for the Members trip. This is simply a misunderstanding of the terms "sponsor", "contributor", and "participant" as used in the Ethics rules which is why I sent you the Rules book for preparation.

Once you are able to clarify these issues and make sure your itinerary passes too, you should be fine. An Ethics Committee Staff Attorney must review and approve as well. Your Staff Attorney is Susan.

From: Kelly Mobley, Dawn
Sent: Friday, October 12, 2007 11:55 AM
To: plouls
Subject: RE: Confidential

Have you spoken with your Director and explained the problem so you can call Olson asap?

From: Kelly Mobley, Dawn
Sent: Friday, October 12, 2007 9:59 AM
To: plouls
Subject: FW: Confidential

Please read the emails below. Give Susan a call as soon as you work through the kink, let her know you are following up. Please make yourself available to work through this matter today. Thank you Patricia. (These other organizations can participate in the program but should not bear pay for the trip).

From: Olson, Susan
Sent: Friday, October 12, 2007 9:29 AM
To: O'Reilly, Bill; Kelly Mobley, Dawn
Subject: FW: Carib News - Pre-trip Approval Issues

Bill and Dawn,
 Please note the following response from Ms. Louls at Carib News: Unfortunately, it appears that if each sponsor contributes funding directly to the trip (an earmark of funds) and not simply to the general funds of Carib News, then the assumption is that all of these entities are co-sponsors of the trip for purposes of the House travel rules. If that is the case and since it is likely that at least one of these co-sponsors hires or retains a federally registered lobbyist, the trip could only be a one-day event trip. Thus the Committee can't approve the trip as it currently exists.

But, if you have a different interpretation of the below information from Ms. Louls, please do let 10/12/2007

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me know. Thank! Susan.

Susan L. Olson

Counsel
House Committee on Standards of Official Conduct
HT-2, The Capitol Building
Washington, DC 20515
Phone: 202-225-7109
Fax: 202-225-7392

From: piouls [mailto:piouls@nycarbnews.com]
Sent: Thursday, October 11, 2007 10:33 AM
To: Olson, Susan
Subject: RE: Carib News - Pre-trip Approval Issues

Ms. Olson,

In response to your e-mail:

The sponsors contribute to the overall expense of the trip and the general work of the Foundation.

As a courtesy, each contributor is given an opportunity to be attached to a part of the program

that is being presented. They do not determine the content or the other participants in the Conference.

No federally registered lobbyist or foreign agent will be accompanying the Members of participating in the program.

Regards

Fatima Louis
Executive Assistant
CARIB NEWS
7 West 38th Street, 3th Floor
New York, NY 10018

-----Original Message-----
From: Olson, Susan [mailto:Susan.Olson@mail.house.gov]
Sent: Wednesday, October 10, 2007 4:01 PM
To: piouls@nycarbnews.com
Cc: Dawn.Kelly.Mooley@mail.house.gov; O'Reilly, Bill
Subject: Carib News - Pre-trip Approval Issues

Dear Mrs. Louis:

With regard to the pre-trip approval requests for the Carib News Foundation's

10/12/2007

09-3698 0182

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(Foundation) trip to Antigua, the issues involving sponsorship are as follows:

While the sponsor form that you completed indicates that the Foundation is the sole sponsor of the 2007 trip, the draft schedule, however, indicates that the following entities are "sponsoring" sessions, events, etc. during this trip:

- o Antigua Government
- o Sandals
- o Royal Caribbean Bakery
- o CITI
- o Pfizer
- o Macy's
- o AT&T
- o HSBC
- o IBM
- o Goodworks International
- o Preferred Health Partners
- o Antigua & Barbuda
- o American Airlines
- o Golden Krust

Last year the Foundation provided the following information regarding these "additional sponsors" for the November 9 to 12, 2006 trip:

The Foundation, which is a 501 (c)(3) nonprofit organization, will be paying for the Members' travel expenses including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a "contribution to the overall pool of expenses in contribution to the Foundation" which is used to underwrite the overall expenses of the Conference, primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organization who will be attending and participating in the Conference.

Accordingly, the Committee's Advisory Opinion, dated October 27, 2006, provided that all of the organizations that provided financial underwriting for the trip along with the Foundation were required to be listed as the "trip sponsors" on the participating Members' post-travel disclosure form and their 2006 annual financial disclosure statements.

Accordingly, you need to provide information describing the role of these "additional sponsors" as listed in the 2007 trip draft schedule for this current trip. Without such information, I cannot proceed with the review of the pre-trip approval requests for the Foundation's Antigua trip.

Susan L. Olson

Counsel

House Committee on Standards of Official Conduct

10/12/2007

09-3698 0183

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HO-2, The Capitol Building
Washington, DC 20515
Phone: 202-225-7103
Fax: 202-225-7392

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CARIBNEWS
THE WEEKLY VOICE OF THE CARIBBEAN-AMERICAN COMMUNITY
1 West 57th Street, 4th Floor, New York, NY 10019

TEL: (212) 944-1991; FAX: (212) 944-2039
E-MAIL ADDRESS: NYCARIB@AOL.COM;
CARIBNEWS@ATT.NET

FACSIMILE TRANSMITTAL SHEET

TO: Dawn Kelly Mobley	FROM: R. Louis
COMPANY: Ethick Counsel for Cong. Stephanie Tubbs Jones	DATE: 10/11/97
FAX NUMBER: 202-225-7392	TOTAL NO. OF PAGES INCLUDING COVER:
RE: Travel Report	

NO ANSWER NO ACKNOWLEDGMENT PLEASE COMMENT PLEASE REPLY YOUR INFORMATION

Further to our conversations of this morning, following is the Travel Certification Form.

The Conference is paid for by the Carib News Foundation. The companies are participants, are not sponsors or co-sponsors for any part of the trip and play no role in the planning or content.

The program has been geared to reflect the companies as Participants.

I regret the mis-understanding and thank you for holding my hand as I go through and grow through this process which is new to me.

Kindly review and advise before I send to Ms. Olsen.

I look forward to hearing from you.

09-3698 0185

CONFIDENTIAL

01 00000

Registration

From: Thomas Shelley [ShelleyThomas@mail.house.gov]
Sent: Thursday, October 11, 2007 7:47 AM
To: plouls
Subject: RE: Carib News - Pre-trip Approval Issues

This is new territory since we never had to go through this before. I don't have an answer and I already turned in Donna's forms.

From: plouls [mailto:plouls@nycafbnews.com]
Sent: Wednesday, October 10, 2007 5:58 PM
To: Kelly Moley, Downy, Thomas, Shelley Dalley, George
Subject: RE: Carib News - pre-trip approval issues

Please see e-mail I received from Ms. Olson of the Committee on Standards of Official Conduct.

A possible response could be: The sponsors contribute to the overall expense of the trip and the general work of the Foundation. As a courtesy, each contributor is given an opportunity to be attached to a part of the program that is being presented. They do not determine the content or the other participants in the Conference.

Please advise us.

Regards and Thanks

Patricia Lovitt
Executive Assistant
CARIB NEWS
7 West 34th Street, 8th Floor
New York, NY 10018

Original Message
From: Olson, Susan [mailto:Susan.Olson@mail.house.gov]
Sent: Wednesday, October 10, 2007 4:01 PM
To: plouls@nycafbnews.com
Cc: Kelly Moley [mailto:kelly.moley@mail.house.gov], O'Reilly, Bill
Subject: Carib News - Pre-trip Approval Issues

Dear Ms. Lovitt:

With regard to the pre-trip approval requests for the Carib News Foundation's (Foundation) trip to Antigua, the issues involving sponsorship are as follows:

While the sponsor form that you completed indicates that the Foundation is the sole sponsor of the 2007 trip, the draft schedule, however, indicates that the following entities are "sponsoring"

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sessions, events, etc. during this trip:

- o Antigua Government
- o Sandals
- o Royal Caribbean Bakery
- o CITI
- o Pfizer
- o Macy's
- o AT&T
- o HSBC
- o IBM
- o Goodworks International
- o Preferred Health Partners
- o Antigua & Barbuda
- o American Airlines
- o Golden Kiosk

Last year the Foundation provided the following information regarding these "additional sponsors" for the November 9 to 12, 2006 trip:

The Foundation, which is a 501(c)(3) nonprofit organization, will be paying for the Members' travel expenses including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a "contribution to the overall pool of expenses in contribution to the [Foundation]," which is used to "underwrite the overall expenses of the Conference," primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organization who will be attending and participating in the Conference.

Accordingly, the Committee's Advisory Opinion, dated October 27, 2006, provided that all of the organizations that provided financial underwriting for the trip along with the Foundation were required to be listed as the "trip sponsors" on the participating Members' post-travel disclosure form and their 2006 annual financial disclosure statements.

Accordingly, you need to provide information describing the role of these "additional sponsors" as listed in the 2007 trip data schedule for this current trip. Without such information, I cannot proceed with the review of the pre-trip approval requests for the Foundation's Antigua trip.

Susan L. Olson
 Counsel
 House Committee on Standards of Official Conduct
 HT-2, The Capitol Building
 Washington, DC 20515
 Phone: 202-225-7103
 Fax: 202-225-7392

09-3698 0187

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Re: Carib News - Pre-trip Approval Issues

Page 1 of 3

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Wednesday, October 10, 2007 6:49 PM
To: plouls@nycafnnews.com
Subject: Re: Carib News - Pre-trip Approval Issues

Her question centers on whether any of these "co-sponsors" is a lobbyist or foreign. This is the issue you and I focused on previously. It is a central problem if any do and are paying for the events. If so, you are in the same position as last year with one-day events. Call Susan back tomorrow as early as possible. Hopefully, these co-sponsors don't retain lobbyists, but you should have their representations on this matter. At a minimum, Macy's does, right? Alternatively, if they are only sponsoring event tables or the like, a lobbyist will not be problematic.

Please Use The Reply

-----Original Message-----
From: plouls@nycafnnews.com
To: Kelly Mobley, Dawn, Thomas, Shelley, Kelley, George
Sent: Wed Oct 10 17:56:25 2007
Subject: RE: Carib News - Pre-trip Approval Issues

Please see e-mail I received from Ms. Olson of the Committee on Standards of Official Conduct.

A possible response could be: The sponsors contribute to the overall expense of the trip and the general work of the Foundation. As a courtesy, each contributor is given an opportunity to be attached to a part of the program that is being presented. They do not determine the content or the other participants in the Conference.

Please advise us.

Regards and Thanks

Patricia Lunde
Executive Assistant
CARIBNEWS
4 West 26th Street, 8th Floor
New York, NY 10018

-----Original Message-----
From: Dawn, Susan [DawnSusanOlson@mail.house.gov]
Sent: Wednesday, October 10, 2007 4:01 PM

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cc: CARIB NEWS - RE: TRIP APPROVAL ISSUES

Page 2 of 3

To: glouis@nycarfbnews.com
 Cc: Dawn Kelly Mohay@mail.house.gov; O'Rally, Bill
 Subject: Carib News - Pre-trip Approval Issues

Dear Mrs. Louiss,

With regard to the pre-trip approval requests for the Carib News Foundation's (Foundation) trip to Antigua, the issues involving sponsorship are as follows:

While the sponsor form that you completed indicates that the Foundation is the sole sponsor of the 2007 trip, the draft schedule, however, indicates that the following entities are "sponsoring" sessions, events, etc. during this trip:

- o Antigua Government
- o Bhandals
- o Royal Caribbean Bakery
- o GHI
- o Pfizer
- o Mayo's
- o A&T
- o HSBC
- o IBM
- o Goodwages International
- o Preferred Health Partners
- o Antigua Barbuda
- o Amdecar Airlines
- o Golden Krust

Last year the Foundation provided the following information regarding these "additional sponsors" for the November 9 to 12, 2006 trip:

The Foundation, which is a 501(c)(3) nonprofit organization, will be paying for the Members' travel expenses including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a "contribution to the overall pool of expenses in contribution to the Foundation," which is used to "underwrite the overall expenses of the Conference," primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organization who will be attending and participating in the Conference.

Accordingly, the Committee's Advisory Opinion, dated October 27, 2006, provided that all of the organizations that provided financial underwriting for the trip along with the Foundation were required to be listed as the "trip sponsors" on the participating Members' post-travel disclosure form and their 2006 annual financial disclosure statements.

10/10/2007

09-3698 0189

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Accordingly, you need to provide information describing the roles of these "additional sponsors" as listed in the 2007 trip draft schedule for this current trip. Without such information, I cannot proceed with the review of the pro-trip approval requests for the Foundation's August trip.

Susan E. Nelson
Counsel
House Committee on Standards of Official Conduct
1112, The Capitol Building
Washington, DC 20515
Phone: 202-225-7103
Fax: 202-225-7392

10/10/2007

09-3698 0190

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From: Shelley Thomas

Page 1 of 1



[Print] [Close]

From: "Thomas, Shelley" <Shelley.Thomas@mail.house.gov>
 "James, Carlos" <Carlos.James@mail.house.gov>, "Lora, Karyn" <Karyn.Lora@mail.house.gov>,
 "Bishop, Mary" <Mary.Bishop@mail.house.gov>, "Chaplin, Jenelle"
 "Jenelle.Chaplin@mail.house.gov", "Pikens, Crystal" <Crystal.Pikens@mail.house.gov>; "Hamlett,
 Brian" <Barbara.Hamlett@mail.house.gov>, "Hendricks, Joseph"
 "Joseph.Hendricks@mail.house.gov", "Dalley, Kade" <Kade.Dalley@mail.house.gov>,
 "GAD4Scheduling" <GAD4Scheduling@mail.house.gov>; "Murray, Darlene"
 "Darlene.Murray@mail.house.gov", "Esher, Pat" <Pat.Esher@mail.house.gov>; "Featherston,
 Wendy" <Wendy.Featherston@mail.house.gov>; "Pittman, Megan" <MPittman@mail.house.gov>,
 "Roy, Lela" <Lela.King@mail.house.gov>; "Resendez, Mariana"
 "Mariana.Resendez@mail.house.gov"; "Kilgus, Taryn" <Taryn.Kilgus@mail.house.gov>,
 "Taylor, Scott" <Scott.Taylor@mail.house.gov>; "Anderson, Kwamina (Waters)"
 "Kwamina.Anderson@mail.house.gov"; "Howie, Lisa" <Lisa.Howie@mail.house.gov>; "Boyd,
 Angie" <Angie.Boyd@mail.house.gov>; "Rodney, Raven" <Raven.Rodney@mail.house.gov>,
 "Waskow, Jean" <Jean.Waskow@mail.house.gov>; "Holmes, Alicia"
 "Alicia.Holmes@mail.house.gov"; "Epps, Nicola" <Nicola.Epps@mail.house.gov>; "Johnson, Aya"
 "Aya.Johnson@mail.house.gov";
 Cc: <carp-desk@mt.net>
 Subject: Emailing 110th rule change page
 Date: Thu, 4 Oct 2007 16:36:27 +0000

To the CSC Members who indicated a "yes" or "maybe" in attending the
 Carol News Foundation Business Conference in Antigua, British West
 Indies on November 8-11 of 2007, I have attached the web site for the
 ballot form that must be submitted by Members no later than 20:00
 October 9 to the Ethics Committee. I will be bringing copies of the
 agenda, as well as copies of the ballot form that Carol News had to
 complete and submit to Ethics, to all of the offices indicated above,
 today and tomorrow by noon. If anyone has any questions, please call me
 at 5-1799. Please make sure that members have their official passports,
 as we are going to a foreign country.

This message is ready to be sent with the following file or link
 attachments:

Shortcut to: http://www.house.gov/ethics/110th_rule_change_page.htm

NOTE: To protect against computer viruses, e-mail programs may prevent
 sending or receiving certain types of file attachments. Check your
 e-mail security settings to determine how attachments are handled.
 <110th_rule_change_page.url>

Attachment 1: 110th_rule_change_page.url (application/octet-stream)

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http://webmail.at&t.com/vnc/h/wm/47056C17000D0D2F0002DBD2160370223055C0A0B... 10/4/2007

CONFIDENTIAL

New Travel Regulations, Forms, and Instructions (effective March 1, 2007):

The House Rules for the 110th Congress changed the travel rules for Members, staff, and outside sponsors. Regulations, forms, and instructions governing privately-sponsored travel taking place after March 1, 2007 are available below. An Advisory Memorandum providing additional guidance regarding travel was released on March 15, 2007. New versions of the forms relating to privately-sponsored travel were released April 6, 2007.

- [Travel Guidelines and Regulations](#)
- [Instructions and Certification Form to be filled out by Private Sponsors](#)
- [Traveler Form to be filled out by Members, Officers, and Employees](#)
- [Post-Travel Disclosure Form for Members and Officers](#)
- [Post-Travel Disclosure Form for Employees](#)

Please note: Both the Private Sponsor Certification and the Member/Officer/Employee Traveler Forms must be filed with the Committee at the same time in order to process your request.

New Gift Rule Changes:

The House Rules for the 110th Congress amended House Rule 26, Clause 3 (the "gift rule") with respect to the acceptance of gifts and travel. Some of the guidance on this website regarding gifts and travel may therefore no longer apply. On February 6, 2007, the Committee issued an advisory memorandum on the changes to the gift rule. On May 24, 2007, the House amended the gift rule exception concerning the acceptance of offers of free attendance at charity events. In view of the amendment, on June 14, 2007, the Committee issued a revised memorandum that incorporates the change to the rule. Please contact Committee staff at 202-225-7182 with any questions.

Financial Interests under New Earmark Rules

The House Rules for the 110th Congress changed the Code of Official Conduct regarding earmarks. This provision requires that a Member, Delegate, or Resident Commissioner who requests an earmark or a limited tax or tariff benefit to provide certain information regarding the request and its purpose to the committee of jurisdiction. An Advisory Memorandum providing guidance in this matter was released on March 27, 2007.

Registration

From: Smith, Hilary [Hilary.Smith@mail.house.gov]
Sent: Thursday, October 04, 2007 4:32 PM
To: piouls@ny.caribnews.com
Subject: Travel Approval Forms for Antigua Trip

Fabrice,

Here is what I need from --

12 -- Describe the role of each sponsor in organizing and conducting this trip -- The answer should say something about how Carib News organized, planned, pulled together the invitee list and chose the destination.

13 -- Describe the organizational interest -- It is the Carib News' Annual conference.

The revised forms, along with the list of invitees, should be sent to each invitee to they send to the committee so that we do not receive the wrong forms from the Congressional offices. Let me know if you have any questions.

Hilary Smith

Committee on Standards of Official Conduct

HT-2, The Capitol

Washington, DC 20516

202-225-7105

10/4/2007

09-3698 0193

CONFIDENTIAL

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Wednesday, October 03, 2007 2:02 PM
To: plous
Subject: RE: Please read query below

Ignore the last email b/c we are working to meet the 30-day submission. Just stand by so we can get back in touch today; have it all resolved tomorrow, Monday is a holiday.

From: Kelly Mobley, Dawn
Sent: Wednesday, October 03, 2007 12:39 PM
To: plous
Subject: RE: Please read query below

Thank you. We have assigned your review to Staff Attorney Susan Olson. Please reach her by phone at 202/226-8906 next week if she has not reached out to you. She will need a few days of review. Thank you very much.

From: plous [mailto:plous@nyednews.com]
Sent: Monday, October 01, 2007 6:46 PM
To: Kelly Mobley, Dawn
Subject: RE: Please read query below

The Conference dates are November 8-11, 2007, and opens on Thursday November 8 and ends the morning of November 11, 2007 - (3 nights)

CARIE NEWS FOUNDATION is the sponsor of the event.

Item No. 12: The companies like Pfizer, AT&T are donors/contributors of grants to the Foundation for educational purposes and **NOT** the SPONSOR, consequently the information contained in that item will have to be changed.

Awaiting your advice.

Regards

Fabrizia Loria
 Executive Assistant
 CARIE NEWS
 7 West 38th Street, 8th Floor
 New York, NY 10018

-----Original Message-----
From: Kelly Mobley, Dawn [mailto:Dawn.KellyMobley@mail.house.gov]
Sent: Monday, October 01, 2007 5:10 PM

10/3/2007

09-3698 0194

Registration

From: plouis [plouis@nycaribnews.com]
 Sent: Monday, October 01, 2007 5:40 PM
 To: Kelly Mobley, Dawn
 Subject: RE: Please read query below

The Conference dates are November 8-11, 2007, and opens on Thursday November 8 and ends the morning of November 11, 2007. (3 nights)

CARIB NEWS FOUNDATION is the Sponsor of the event.

Item No. 12: The companies like Pfizer, AT&T are donors/contributors of grants to the FOUNDATION for educational purposes and **NOT** the SPONSOR, consequently the information contained in that item will have to be changed.

Awaiting your advice.

Regards

Patricia Louis
 Executive Assistant
 CARIB NEWS
 7 West 38th Street, 6th Floor
 New York, NY 10018

-----Original Message-----
 From: Kelly Mobley, Dawn [mailto:dawn.kelly.mobley@mail.house.gov]
 Sent: Monday, October 01, 2007 5:10 PM
 To: plouis
 Subject: RE: Please read query below.

From: Kelly Mobley, Dawn
 Sent: Monday, October 01, 2007 5:08 PM
 To: Kelly Mobley, Dawn
 Subject: RE: Query

We are trying to work through a problem in approving the co-sponsors, please. Are they each paying for a one-day, widely attended event or more days? Please read the Gift Rules I forwarded you on this matter.

From: Kelly Mobley, Dawn
 Sent: Tuesday, September 25, 2007 12:42 PM
 To: plouis

Please forward the paperwork as well to the Chairwoman's personal office so her scheduler can complete the work from that office. Please get it to Lilla King today. Her fax number is 202/225-1338. She has to complete the *Me/Be* forms and meet the same deadline.

From: plous [mailto:plous@nycaribnews.com]
Sent: Monday, October 01, 2007 6:40 PM
To: Kelly Mobley-Dawn
Subject: RE: Please read query below

The Conference dates are November 8-11, 2007, and opens on Thursday November 8 and ends the morning of November 11, 2007. (3 nights)

CARIB NEWS FOUNDATION is the Sponsor of the event

Item No. 12. The companies like Pfizer, AT&T are donors/contributors of grants to the Foundation for educational purposes and NOT the SPONSOR; consequently assume the information contained in that item will have to be changed.

Awaiting your advice.

Regards

MARTHA LOUIS
Executive Assistant
CARIB NEWS
7 West 36th Street, 8th Floor
New York, NY 10018

----- Original Message -----
From: Kelly Mobley, Dawn [mailto:Dawn.KellyMobley@mail.house.gov]
Sent: Monday, October 01, 2007 5:10 PM
To: plous
Subject: RE: Please read query below

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mailhouse.gov]
Sent: Monday, October 01, 2007 6:10 PM
To: plouis
SUBJECT: RE: Please read query below

From: Kelly Mobley, Dawn
Sent: Monday, October 01, 2007 5:08 PM
To: Kelly Mobley, Dawn
Subject: RE: Query

We are trying to work through a problem in approving the co-sponsors piece. Are they each paying for a one-day, widely attended event or more days? Please read the Gift Rules I forwarded you on this matter.

From: Kelly Mobley, Dawn
Sent: Tuesday, September 25, 2007 12:42 PM
To: plouis
Subject: Query

I am working through your forms before leaving them with our legal attorney and have a question. Query: Why did you not list CARIB NEWS as the sponsor as you'd indicated instead of Maey's, etc. The official sponsor for travel, lodging, and planning is still Carib News, correct?

From: Kelly Mobley, Dawn
Sent: Tuesday, September 18, 2007 12:57 PM
To: plouis
Subject: RE: Draft Program - 2007 Business Conference (No agenda or program attached)

When you send the draft agenda, please also forward any information on your sponsor's status. If he cannot be a lobbyist. Do you need a copy of the new travel rules?

From: Kelly Mobley, Dawn
Sent: Monday, September 17, 2007 5:53 PM
To: plouis
Subject: RE: Draft Program - 2007 Business Conference

Nothing was attached to this email. Therefore, we have not received the proposed agenda you mention below and have nothing to preview.

From: plouis [mailto:plouis@nycaribnews.com]
Sent: Monday, September 17, 2007 3:47 PM
To: Kelly Mobley, Dawn
Subject: Draft Program - 2007 Business Conference

Ms. Mobley:
 We spoke earlier re permission for Members to attend the Conference and you asked for

The program. I have not gotten back to you because we have been working on getting the program together. Attached is the draft for your guidance.

Regards and Thanks.

Patricia Lopez
Executive Assistant
CARIB NEWS
7 West 36th Street, 8th Floor
New York, NY 10018.



THE NEW YORK CARIBNEWS

THE WEEKLY VOICE OF THE CARIBBEAN AMERICAN COMMUNITY
7 WEST 87TH STREET, 8F FLOOR, NEW YORK, NY 10019

TEL: (212) 944-1904; FAX: (212) 944-2089
E-MAIL ADDRESS: NYCARIB@AOL.COM;
CARIBNEWS@ATT.NET

POSSIBLE TRANSMITTAL SHEET

TO: Dawn Kelly Mobley	FROM: Patricia Louis
COMPANY:	DATE: 9/21/07
FAX NUMBER: 202/225-7322	TOTAL NO. OF PAGES INCLUDING COVER:
RE: SPONSOR FORMS	
<input type="checkbox"/> URGENT <input type="checkbox"/> FOR REVIEW <input type="checkbox"/> PLEASE COMMENT <input type="checkbox"/> PLEASE REPLY <input checked="" type="checkbox"/> YOUR INFORMATION	

Following is a completed form for your advisement /review/communications:

Regards

U.S. House of Representatives
Committee on Standards of Official Conduct

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM
(provide directly to each House invitee)

This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers or employees under House Rule XXV, clause 3. A completed copy of the form (and any attachments) should be provided to each invited House Member, officer or employee, who will then forward it to the Committee. The trip sponsor should NOT submit the form directly to the Committee.

Private sponsors are urged to submit this form to each House invitee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the invitee not receiving approval for the trip. The submission of an incomplete form will delay the review process. Before completing this form, sponsors are urged to carefully review the Committee's private travel guidelines and advisory memoranda detailing the rules and restrictions for private travel, as well as the instructions for completing this form. Sponsors should call the Committee with any questions prior to submitting the form. Please type form.

Daily News Foundation

1. Sponsor(s) (who will be paying for the trip): _____
2. I represent that the trip will not be financed (in whole or in part) by a federally-registered lobbyist or a registered foreign agent (check "yes" by checking box): No
3. I represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip (check "yes" by checking box): No
4. Is travel being offered to an accompanying family member of the House invitee(s)? Yes No
5. Provide names and titles of AHE House invitees; for each invitee, provide explanation of why the individual was invited (include additional pages if necessary). Each representative spouse is invited or one family member: _____
6. Date of travel: November 6-11, 2007
7. Cities of departure -- destination -- return: Venice depending on member
8. Attached is a detailed agenda of the activities taking place during the travel (i.e., an hourly description of planned activities) (check "yes" by checking box): No
9. I represent that (check one of the following):
 - a. This sponsor of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1963: No
 - b. The sponsor of the trip does not retain or employ a federally registered lobbyist or registered foreign agent: No
 - c. This trip is for attendance at a one-day event and lobbyist involvement in planning, organizing, requesting, or arranging the trip was de minimis under the Committee's travel regulations: No
10. If travel is for participation in a one-day event (i.e., if you checked Question 9(c)), check one of the following:
 - a. One night's lodging and meals are being offered: No
 - b. Two nights' lodging and meals are being offered: No
 - if "b" is checked, explain why the second night is warranted: _____

11. If the trip is not sponsored by an institution of higher education, I represent that a federally-registered lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip (signify "yes" by checking box):

12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip: Pfizer Education/Health AT&T and IBM: provide technology to the region, MACYS - seeks new vendor sources, Citibank, opportunities in the region.

13. Describe each sponsor's organizational interest in the purpose of the trip: Regular scheduled air service, economy class.

14. Describe the type and class of the transportation being provided. Indicate whether coach, business-class or first-class transportation will be provided. In addition, for travel via aircraft please indicate if travel is being offered on a commercial flight, chartered flight or on an aircraft operated or paid for by a carrier not licensed by the Federal Aviation Administration to operate for compensation or hire (i.e., a private aircraft). If first-class fare is being provided, or if travel is via chartered or private aircraft, please provide an explanation describing why such travel is warranted.

15. I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s). (signify "yes" by checking box)

16. I represent that either (check one of the following):
 a. This trip involves an event that is arranged or organized without regard to congressional participation and that meals provided to congressional participants are similar to those provided to or purchased by other event attendees: or
 b. The trip involves events that are arranged or organized specifically with regard to congressional participation:
 If "b" is checked, detail the cost per day of meals (approximate cost may be provided):

17. Reason for selecting the location of the event or trip: A Caribbean country that has not previously hosted the conference.

18. Name of hotel or other lodging facility: Sandals Hasan/Hex Hasan

19. Cost per night of hotel or other lodging facility (approximate cost may be provided): \$110.00

20. Reason(s) for selecting hotel or other lodging facility: Has appropriate meeting rooms.

71. TOTAL EXPENSES FOR EACH PARTICIPANT:

Fluctual estimate of good faith estimates	Total Transportation Expenses per Participant	Total Lodging Expenses per Participant	Total Meal Expenses per Participant
For each Member, Officer, or employee	320	330	195
For each accompanying family member:	320	0	195

	Other Expenses (dollar amount)	Identify Specific Nature of "Other" Expenses (e.g., taxi, parking, registration fee, etc.)
For each Member, Officer, or employee:		
For each accompanying family member:		

22. I represent that reimbursement for miscellaneous travel expenses for the trip, such as travel to and from airports, security costs, interpreter fees, visa application fees, and similar expenses, will be for actual costs incurred and are necessary for the purpose of the trip. (Identify "yes" by checking box)
23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: _____
 Name and title: _____
 Organization: _____
 Address: _____
 Telephone number: _____
 Fax number: _____
 E-mail Address: _____

The Chairman/for staff may contact the above individual above if additional information is required.

If there are any questions regarding this form please contact the Committee at the following address:

Committee on Standards of Official Conduct
 U.S. House of Representatives
 H-12, The Capitol
 Washington, D.C. 20515
 (202) 225-7118 (phone)
 (202) 225-7332 (general fax)
 (202) 225-7172 (fax for travel approvals)

Version date 4/2007 by Committee on Standards of Official Conduct.

U.S. House of Representatives
Committee on Standards of Official Conduct

INSTRUCTIONS FOR FILLING OUT THE PRIVATE SPONSOR TRAVEL
CERTIFICATION FORM

1. *Sponsor(s) (who will be paying for the trip):* Fill in the names of each person, organization, or other entity contributing funds or in-kind support towards the trip.
2. *I represent that the trip will not be financed (in whole or in part) by a federally-registered lobbyist or a registered foreign agent.* House Members and staff may not accept travel funded by a lobbyist or registered foreign agent, even when the lobbyist or foreign agent will be reimbursed by a client or employer.
3. *I represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip.* All financial contributors to the trip must qualify as sponsors and should be listed as a sponsor in response to question 1.
4. *Is travel being offered to an accompanying family member of the House invitee(s)?* Check yes or no. House Rules permit Members and House staff to accept travel benefits for one accompanying family member if offered by the trip sponsor.
5. *Provide names and titles of ALL House invitees; for each invitee, provide explanation of why the individual was invited.* You must list every House Member and employee who is invited on the trip, together with your reason for inviting that individual. Members and House staff may accept privately sponsored travel only when related to the individual's official duties. The explanation should demonstrate a connection between the trip and each invitee's official duties.
6. *Dates of Travel:* State the dates of departure and return.
7. *Cities of departure -- destination -- return:* For example, an appropriate entry might read: "DC - Detroit - DC". Include additional destinations if there will be more than one. Do not list the names of airports, times of flights, or cities where travelers will have an airport layover (this information should be included in the attached detailed agenda).
8. *Attached is a detailed agenda of the activities taking place during the travel.* The agenda should be a detailed, hour-by-hour agenda, include the names of speakers and the subjects of briefings. The agenda should also include information regarding the time spent on travel to and from the destination, as well as local travel. Travel will not be approved if the agenda includes an excessive amount of either unscheduled time and/or opportunities for recreational activities, even if such activities are at the personal expense of the invitees.

9. *I represent that (check one of the following):* Check only one box in response to this question. "Institutions of higher education" generally includes accredited public and private colleges or trade schools located in the U.S. and its territories; such entities should check box "a," regardless of whether they employ or retain a federal lobbyist or foreign agent. Entities other than institutions of higher education that do not employ or retain a federal lobbyist or foreign agent should check box "b." Entities other than institutions of higher education that do employ or retain a registered lobbyist or foreign agent may sponsor travel only for one-day events. For such trips, lobbyist involvement must be "de minimis" as defined by Committee regulations (see question 12).
10. *If travel is for participation in a one-day event, check one of the following:* Complete this question only if you checked box "a" in response to question 9. For travel to one-day events sponsored by an entity that retains or employs a lobbyist, lodging and meals generally may be provided only for one night. However, two nights may be authorized by the Committee in accordance with the factors set forth in Committee regulations.
11. *If the trip is not sponsored by an institution of higher education, I represent that a federally registered lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip.* House Rules prohibit Members and employees from being accompanied by registered lobbyists or foreign agents while traveling. This rule does not prohibit lobbyist or foreign agent participation in briefings or meetings that occur at the destination.
12. *Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip.* The sponsor(s) (the entity or entities paying for the trip) should be the entity primarily responsible for organizing the trip. Travel may not be accepted from an entity that merely contributes money towards the travel and is not otherwise involved in planning or conducting the trip.
13. *Describe each sponsor's organizational interest in the purpose of the trip.* Briefly describe the interest or purpose of each sponsor in the trip.
14. *Describe the type and class of transportation being provided.* See directions on form.
15. *I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s).* While Members and staff may accept local transportation necessary in facilitating their participation in official aspects of a trip, Members and staff may not accept local transportation in connection with recreation or entertainment.
16. *I represent that either:* For events that are arranged or organized without regard to congressional participation (e.g. annual meetings of business or trade associations), Members or employees may accept the meals that are provided to all other attendees as part of the event. For events put on specifically for Members or staff, meal expenses must be "reasonable" in accordance with Committee regulations.

17. *Reason for selecting the location of the event or trip:* The destination of a trip must be related to its purpose. Travel to a location of an event organized without regard to congressional participation (for example, annual meetings of business or trade associations) is presumptively reasonable.
18. *Name of hotel or other lodging facility:* Include the names of all hotels and lodging facilities to be used during the trip.
19. *Cost per night of hotel or other lodging facility:* Self-explanatory. Trip sponsors should not pay for a "package" that includes recreational or entertainment activities. However, Members and staff may generally use a pool or gym facilities that are offered free of charge to all hotel guests.
20. *Reason(s) for selecting hotel or other lodging facility:* For events held without regard to congressional participation (e.g., annual meetings of business or trade associations), an entry such as "location of annual trade association meeting" is sufficient. When the trip is held specifically for Members or staff, include rationale such as proximity to the site to be visited or to the airport.
21. *Total Expenses for Each Participant:* Indicates whether the figures provided are actual amounts or good faith estimates by checking the appropriate box. All trip expenses should be included. Expenses other than those for transportation, lodging, and meals must be individually listed and specified.
22. *I represent that reimbursement for miscellaneous travel expenses for the trip, such as travel to and from airports, security costs, interpreter fees, visa application fees, and similar expenses, will be for actual costs incurred and are necessary for the purpose of the trip.* Members and staff may not accept a lump sum based on an estimate of incidental expenses.
23. *Certification Information:* Self-explanatory.

THE TRIP SPONSOR SHOULD PROVIDE A COPY OF THE COMPLETED FORM, INCLUDING ALL ATTACHMENTS, TO EACH HOUSE MEMBER OR EMPLOYEE INVITED ON THE TRIP.

Version 04/07/07 Committee on Standards of Official Conduct

U.S. House of Representatives

COMMITTEE ON STANDARDS OF
OFFICIAL CONDUCT
Washington, DC 20515

October 27, 2006

Ms. Michele Rodney
Cath News Foundation
7 West 36th Street, 8th Floor
New York, NY 10018

Dear Ms. Rodney:

This responds to your letter requesting Committee guidance concerning the participation of House Members in the 11th Annual Caribbean Multi-National Business Conference ("Conference") sponsored by the Cath News Foundation ("Foundation"), and other organizations. The conference is scheduled to take place in Panama City, Panama from November 9 to 12, 2006. According to your submission, the Foundation, which is a 501(c)(3) nonprofit organization, will be paying for the Members' travel expenses including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a "contribution to the overall pool of expenses in contribution to the Foundation" which is used to "underwrite the overall expenses of the Conference," primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organization who will be attending and participating in the Conference.

The Committee on Standards of Official Conduct strongly encourages outside organizations equitably to offset travel expenses to House Members and staff in contact with our office. We are familiar with the rules governing the acceptance of such an offer. It is important to bear in mind, however, that the Committee is authorized by the Rules of the U.S. House of Representatives to render advisory opinions to Members, officers, and employees regarding the propriety of interest or proposed conflict. We do not render such opinions to private organizations. Particularly in the case of travel, it is the Member, officer, or employee who is at risk in the case of a violation of the rules. Given the diverse circumstances in which individual Members and employees find themselves, it would be inappropriate for an outside organization to suggest that a trip had been "pre-arranged" by the Committee. However, we are able to provide you with some general information.

¹ According to your submission, the additional trip sponsors include Macy's, Inc., Qantas, Pfizer, AT&T, Global Travel, Prudential, American Airlines, Citicorp, IBM, Panama City, and the Republic of Panama.

09-3698 0206

Ms. Michelle Rodney
October 27, 2006
Page 2

House Rule 25, clause 5 (the Gift rule) permits a Member or employee of the House to accept from a private source (other than a registered lobbyist or agent of a foreign principal) the necessary travel expenses to attend a meeting, speaking engagement, fundraising trip, or similar event in connection with official duties, if the private source is directly and immediately associated with the event or location being visited. "Necessary" expenses include reasonable expenses for transportation, lodging, food, and refreshments, but they do not include expenditures for entertainment or recreational activities.

Generally, any gifts that may be offered during the trip, including any gifts of entertainment or recreational activity, must be valued at a total of less than \$50 for the trip, with the annual gift limit of less than \$100 from a single source. On any trip, the aggregate value of any such gifts that may be accepted from any source is less than \$50.

In the case of international travel, necessary expenses may be accepted for not more than seven days, excluding travel. House Members may also accept expenses to enable one family member to accompany them on the trip, if funded by the trip sponsor. In addition, each Member who participates in the trip must complete a Travel Disclosure and file this form with the Clerk of the House within 30 days after their return. See House Rule 25, cl. 5(c)(1)(A)(ii), (d)(3). Members are also required to report all travel expenses totaling more than \$300 from a single source on Schedule VII of their annual Financial Disclosure Statement under the Ethics in Government Act and House Rule 26. On both forms, Members should indicate as the "trip sponsor" all of the organizations that provided financial underwriting for the trip.

Because the trip will involve meetings with foreign government representatives and the trip sponsors include the Republic of Panama and Panama City, it is important to note that government officials, including Members and employees of Congress, are prohibited by Article I, section 9, clause 8 of the United States Constitution from receiving "any present...of any kind whatever" from a foreign state or a representative of a foreign government without the consent of the Congress. In the Foreign Gifts and Donations Act (5 U.S.C. § 7102) (50 USC 7102), Congress has consented in advance to acceptance of gifts of travel or expenses for travel taking place entirely outside of the United States offered by a foreign government. Gifts of travel or expenses for travel include food, lodging, transportation, and entertainment related to the official duties of a Member, officer, or employee. Congress has also consented to the acceptance of gifts of minimal value (as defined as a gift or mark of courtesy, 5 U.S.C. § 7342(a)(1)(A)). Under this provision and implementing regulations issued by the Committee, the term "minimal value" is defined as \$50. The FGDIA also permits Members and staff to accept a gift worth more than minimal value when refusal would cause offense or embarrassment, such gifts are the property of the United States and must be deposited with the Clerk of the House. Any tangible gifts valued in excess of minimal value or travel expenses of any value received from a foreign government pursuant to FGDIA must be disclosed on a Form for Disclosing Gifts from Foreign Governments, in addition to the

09-3698 0207

11/09/2008 10:28 FAX

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Ms. Michele Rodney
October 21, 2006
Page 2.

travel disclosure form described above. Copies of both forms are available on the Committee's website.

Any House Member invited to travel at private expense should be encouraged to contact the Committee's Office of Advice and Education at (202) 225-7103 if they have any questions on the applicable rules. Please provide a copy of this letter to each invited Member.

If you have any further questions, please contact the Committee's Office of Advice and Education at extension 57103.

Sincerely,


Don Hastings
Chairman


Howard E. Berman
Ranking Minority Member

DE/SLB:alg

09-3698 0208

000/2000

0000 0100

02/20/2008 03:13 FAX



Carib News Foundation
 7 West 36th Street, 8th floor, New York, NY 10018
 Tel (usa) 944-1991; Fax (usa) 944-2089
 E-mail: info@caribnewsconference.com

October 16, 2006

The Honorable Doc Hastings
 Chair
 Standards of Official Conduct
 Rm. HT-2, The Capitol
 Washington, DC 20515

Via Fax 202-228-7392 & US Mail

Dear Committee Chair Hastings:

As you might be aware, The Carib News Foundation, created to provide a forum for businesses from the United States to dialogue and establish business partnerships with communities in other parts of the world, has invited Members of Congress to participate in the 11th anniversary of the Caribbean Business Conference.

This year the conference will be held in Panama City, Panama from November 9 – 12, 2006. In cooperation with the Government of Panama, our goal is to have all interested parties joining forces to foster an atmosphere of democracy, stability and opportunity for our fellow citizens of the world. It will also allow businesses in the United States to introduce their products to a new market, thus adding to the economy of both countries.

It is important for Members of Congress to attend in order to get insights into the global economy and how current law and proposed legislation can add in assisting their constituents to move towards a global exchange.

To this effort, The Carib News Foundation and its Board of Directors, respectfully request approval for the Members to attend. If there are any questions or concerns, you may contact me at 212-944-1991. I look forward to making this event as successful in its 11th year as it has been in the past 10 conferences.

Sincerely,

Michele Rodney
 President
 Carib News Foundation

cc: Congresswoman Stephanie Tubbs-Jones

Organized by Carib News Foundation. A non-profit project 501-C-3 corporation

09-3698 0209

Registration

From: plouis [plouis@nycaribnews.com]
Sent: Friday, September 21, 2007 1:56 PM
To: 'Dawn.KellyMoblely@mail.house.gov'
Subject: Re Sponsorship Information

The official sponsor of the conference is the CARIB NEWS FOUNDATION, a not-for-profit 501C3 Organization that provides educational information about the Caribbean Region and its relationship with the US in doing business and developing good neighborly ties with the United States, security, health, education etc.

The CARIB NEWS FOUNDATION does not retain or employ a registered lobbyist or registered foreign agent.

Please use me as your contact for the purposes of this Conference.

The form will be emailed to you this afternoon.

Regards

Patricia Louis

Executive Assistant
CARIB NEWS
7 West 36th Street, 8th Floor
New York, NY 10018

9/21/2007

09-3698 0210

Re: Sponsorship Information

Page 1 of 1

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Wednesday, September 19, 2007 8:32 PM
To: plouls@nycaribnews.com
Subject: Re: Sponsorship Information

My condolences. No, we did not know of their loss. Is Mr. Rodney our actual contact in this matter? If so when appropriate, please impress upon him that the rules have changed dramatically and there are certain gifts and travel that can no longer be permitted so we need to clear this as early as possible. Moreover as he probably remembers, all Members have to seek approval for their individual travel...forms must be prepared, submitted, and approved for each Member's travel. Therefore, please remember to provide each of your invitees with the requisite paperwork. Hopefully by preparing early, we can circumvent the majority of problems you faced in securing their congressional travel last year. Have a good evening and please share my condolences with the Rodney's. Dawn

Sent using BlackBerry

-----Original Message-----
From: plouls <plouls@nycaribnews.com>
To: Kelly Mobley, Dawn
Sent: Wed Sep 19 18:23:58 2007
Subject: Sponsorship Information

9/20/2007

09-3698 0211

CONFIDENTIAL

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
 Sent: Wednesday, September 19, 2007 3:23 PM
 To: plouis
 Subject: RE: Draft Program - 2007 Business Conference (No agenda or program attached)

Lastly, just send the sponsor form asap for review. The new rules might prohibit some things you were able to do with so many different sponsors in the past, but until we get the form, we can't make the most informed decision. I have let the Congresswoman know we are awaiting your sponsor form. Just as you do, they would also like assurance. Thank you.

From: Kelly Mobley, Dawn
 Sent: Wednesday, September 19, 2007 3:09 PM
 To: plouis
 Subject: RE: Draft Program - 2007 Business Conference (No agenda or program attached)

I am mailing (US Postal) a copy of the official Gifts and Travel Guide. Some pages are omitted so call with any questions not addressed in the bound pages. I am using the address you provide in your emails.

From: Kelly Mobley, Dawn
 Sent: Wednesday, September 19, 2007 2:16 PM
 To: plouis
 Subject: RE: Draft Program - 2007 Business Conference (No agenda or program attached)

Patricia:

I understand that several organizations will take part in sponsoring food and other parts of the Antigua travel. However, I need clarification on the *official* sponsor; that organization providing travel, lodging, and organizing the trip? Am I to assume it is CARIB NEWS? The official sponsoring organization must not retain or employ a registered lobbyist or registered foreign agent (and the sponsor must have a direct and immediate relationship with the event or location being visited). To assist with this, I am scanning information/guidelines and emailing in just a moment. Please provide a fax number if that method of submittal will be more helpful. If there is someone handling this matter, please provide me their direct contact information as I must ensure adherence to these new guidelines pre-travel.

In any event, I do need to know who the official sponsor will be. I have assigned a staff attorney to review your documents and will remain in contact with you until this matter is finalized.

Please respond today or tomorrow at the latest. I will be traveling for a while thereafter and must ensure that my staff attorney has all that is necessary for a safe review.

Dawn Kelly Mobley
 Ethics Counsel for Congresswoman Stephanie Tubbs Jones
 Chairwoman, Committee on Standards of Official Conduct
 U.S. of Representatives
 Washington, DC 20545
 202/225-7103

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
 Sent: Tuesday, September 18, 2007 7:03 PM
 To: plouis@mycaribnews.com
 Subject: Re: Draft Program - 2007 Business Conference (No agenda or program attached)

~~Remove this communication from your system if you are not the intended recipient~~

Sent using BlackBerry

09-3698 0212

We had received the forms from Shelley.
 The sponsors to date are : MACYS, PFIZER, AMERICAN AIRLINES, GOLDEN KRUST
 BAKERY, CARIBBEAN FOOD DELIGHTS, PREFERRED HEALTH PARTNERS, IBM,
 AT&T/INGULAR

Regards

Patricia Louis
 Executive Assistant
 CARIB NEWS
 7 West 36th Street, 8th Floor
 New York, NY 10018

-----Original Message-----

From: Kelly Mobley, Dawn [mailto:Dawn.KellyMobley@mail.house.gov]
 Sent: Tuesday, September 18, 2007 12:57 PM
 To: plouls
 Subject: RE: Draft Program - 2007Business Conference (No agenda or program attached)

When you send the draft agenda, please also forward any information on your sponsor's status.
 If/He cannot be a lobbyist. Do you need a copy of the new travel rules?

From: Kelly Mobley, Dawn
 Sent: Monday, September 17, 2007 5:53 PM
 To: 'plouls'
 Subject: RE: Draft Program - 2007Business Conference

Nothing was attached to this email. Therefore, we have not received the proposed agenda you
 mention below and have nothing to preview.

From: plouls [mailto:plouls@nycaribnews.com]
 Sent: Monday, September 17, 2007 3:47 PM
 To: Kelly Mobley, Dawn
 Subject: Draft Program - 2007Business Conference

Ms. Mobley:
 We spoke earlier re permission for Members to attend the Conference and you asked for
 The program. I have not gotten back to you because we have been working on getting
 the program together.
 Attached is the draft for your guidance

Regards and Thanks

Patricia Louis
 Executive Assistant
 CARIB NEWS
 7 West 36th Street, 8th Floor
 New York, NY 10018

Exhibit 18

U.S. House of Representatives
Committee on Standards of Official Conduct

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM
(provide directly to each House invitee)

This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers or employees under House Rule XXV, clause 5. A completed copy of the form (and any attachments) should be provided to each invited House Member, officer or employee, who will then forward it to the Committee. The trip sponsor should NOT submit the form directly to the Committee.

Private sponsors are urged to submit this form to each House invitee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the invitee not receiving approval for the trip. The submission of an incomplete form will delay the review process. Before completing this form, sponsors are urged to carefully review the Committee's private travel guidelines and advisory memoranda detailing the rules and restrictions for private travel, as well as the instructions for completing this form. Sponsors should call the Committee with any questions prior to submitting the form. Please type form.

1. Sponsor(s) (who will be paying for the trip): CARIB NEWS FOUNDATION
2. I represent that the trip will not be financed (in whole or in part) by a federally-registered lobbyist or a registered foreign agent (signify "yes" by checking box):
3. I represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip (signify "yes" by checking box):
4. Is travel being offered to an accompanying family member of the House invitee(s)? Yes No
5. Provide names and titles of ALL House invitees; for each invitee, provide explanation of why the individual was invited (include additional pages if necessary): EACH REPRESENTATIVE'S SPOUSE
6. Dates of travel: NOVEMBER 8 - 11, 2007
7. Cities of departure -- destination -- return: VARIES DEPENDING ON MEMBER
8. Attached is a detailed agenda of the activities taking place during the travel (i.e., an hourly description of planned activities) (signify "yes" by checking box):
9. I represent that (check one of the following):
 - a. The sponsor of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965: or
 - b. The sponsor of the trip does not retain or employ a federally registered lobbyist or registered foreign agent: or
 - c. The trip is for attendance at a one-day event and lobbyist involvement in planning, or organizing, requesting, or arranging the trip was *de minimis* under the Committee's travel regulations.
10. If travel is for participation in a one-day event (i.e., if you checked Question 9(c)), check one of the following:
 - a. One-night's lodging and meals are being offered: or
 - b. Two-nights' lodging and meals are being offered:
 If "b" is checked, explain why the second night is warranted: _____

11. If the trip is not sponsored by an institution of higher education, I represent that a federally-registered lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip (signify "yes" by checking box):
12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip: CARIB NEWS FOUNDATION (SEE ATTACHED SHEET)
13. Describe each sponsor's organizational interest in the purpose of the trip: THE INTEREST OF CARIB NEWS FOUNDATION IS TO PROMOTE, INFORMATION, TRADE AND MEANINGFUL CONNECTION BETWEEN THE UNITED STATES AND THE CARIBBEAN
14. Describe the type and class of the transportation being provided. Indicate whether coach, business-class or first-class transportation will be provided. In addition, for travel via aircraft, please indicate if travel is being offered on a commercial flight, chartered flight or on an aircraft operated or paid for by a carrier not licensed by the Federal Aviation Administration to operate for compensation or hire (i.e., a private aircraft). If first-class fare is being provided, or if travel is via chartered or private aircraft, please provide an explanation describing why such travel is warranted: REGULAR SCHEDULED AIR SERVICE, ECONOMY CLASS
15. I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s). (signify "yes" by checking box):
16. I represent that either (check one of the following):
- The trip involves an event that is arranged or organized *without regard* to congressional participation and that meals provided to congressional participants are similar to those provided to or purchased by other event attendees: xx
 - The trip involves events that are arranged or organized *specifically with regard* to congressional participation:
If "b" is checked, detail the cost per day of meals (approximate cost may be provided): _____
17. Reason for selecting the location of the event or trip: A CARIBBEAN COUNTRY THAT HAS NOT PREVIOUSLY HOSTED THE CONFERENCE
18. Name of hotel or other lodging facility: SANDALS RESORT/REX RESORT
19. Cost per night of hotel or other lodging facility (approximate cost may be provided): \$1,000
20. Reason(s) for selecting hotel or other lodging facility: HAS APPROPRIATE MEETING ROOMS

21. TOTAL EXPENSES FOR EACH PARTICIPANT:

<input type="checkbox"/> actual amounts <input checked="" type="checkbox"/> good faith estimates	Total Transportation Expenses per Participant	Total Lodging Expenses per Participant	Total Meal Expenses per Participant
For each Member, Officer, or employee	320	330	195
For each accompanying family member	320	0	195

	Other Expenses (dollar amount)	Identify Specific Nature of "Other" Expenses (e.g., taxi, parking, registration fee, etc.)
For each Member, Officer, or employee		
For each accompanying family member		

22. I represent that reimbursement for miscellaneous travel expenses for the trip, such as travel to and from airports, security costs, interpreter fees, visa application fees, and similar expenses, will be for actual costs incurred and are necessary for the purpose of the trip (signify "yes" by checking box):

23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: 

Name and title: KARL B. RODNEY, CEO

Organization: CARIB NEWS FOUNDATION

Address: 7 WEST 36TH STREET, 8TH FLOOR NEW YORK, NY 10018

Telephone number: 212-944-1991

Fax number: 212-944-2089

Email Address: CARIB-DESK@ATT.NET

The Committee staff may contact the above individual above if additional information is required.

If there are any questions regarding this form please contact the Committee at the following address:

Committee on Standards of Official Conduct
 U.S. House of Representatives
 HT-2, The Capitol
 Washington, DC 20515
 (202) 225-7103 (phone)
 (202) 225-7392 (general fax)
 (202) 226-7172 (fax for travel approvals)

Version date 4/2007 by Committee on Standards of Official Conduct

2007 MULTINATIONAL BUSINESS CONFERENCE			
NOVEMBER 8 -11, 2007			
INVITED MEMBERS OF CONGRESS			
Sanford Bishop			
G. K. Butterfield			
Donna M. Christensen			
William Lacy Clay			
Sheila Jackson Lee			
Eddie Bernice Johnson			
Kendrick Meek			
Donald Payne			
Charles Rangel			
Bennie Thompson			
Stephanie Tubbs-Jones			
Carolyn Kilpatrick			
Barbara Lee			
Gregory Meeks			
Edolphus Towns			
Yvette Clarke			
Maxine Waters			
James Clyburn			
David Scott			
Laura Richardson			
Eleanor Holmes-Norton			
Elijah Cummings			
Diane Watson			
Keith Ellison			
Henry Johnson			
Melvin Watt			
Albert Wynn			
John Lewis			

OCT-25-2007 14:17 FROM:HON D.M. CHRISTENSEN 92022252051
 10/24/2007 19:00 2129442889

TO:282 225 7392

P.16/16
 PAGE 02

2007 MULTINATIONAL BUSINESS CONFERENCE			
NOVEMBER 8 - 11, 2007			
INVITED MEMBERS OF CONGRESS			
Sanford Bishop			
G. K. Butterfield			
Donna M. Christensen			
William Lacy Clay			
Shella Jackson Lee			
Eddie Bernice Johnson			
Kerndrick Meek			
Donald Payne			
Charles Rangel			
Bernie Thompson			
Stephanie Tubbs-Jones			
Carolyn Kilpatrick			
Barbara Lee			
Gregory Meeks			
Edolphus Towns			
Yvette Clarke			
Maxine Waters			
James Clyburn			
David Scott			
Laura Richardson			
Kleaver Holmes-Norton			
Elijah Cummings			
Diane Watson			
Keith Ellison			
Henry Johnson			
Melvin Watt			
Albert Wynn			
John Lewis			
Britt Wainstock			
George Dalley			



Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10017
Tel: (212) 944-1991 Fax: (212) 944-2089
E-mail: info@caribnewsconference.com

Item #12

CARIB NEWS FOUNDATION is organized to provide education and information about the Caribbean in the area of Business, Education, Health and Culture, Promote Good neighborly within the United States and the hemisphere.

The participants are selected to participate in the various workshops during the Conference based on their demonstrated interest, expertise and assignment in the United States Congress.

Organized by Carib News Foundation. A non-profit project 501-C3 corporation

09-3698 0220

Exhibit 19



WORKING DRAFT
19th Annual Caribbean Media National
FINANCE OFFICERS FORUM
August 11-14, 2007

Thursday, November 8, 2007

12:00pm - 2:00pm

CONFERENCE REGISTRATION

COMMUNITY OUTREACH PROGRAM

WTO - RULES BASED TRADE & POVERTY REDUCTION

Hon. Charles Rangil - Member of Congress

Hon. Maxine Waters - Member of Congress

Hon. Dr. Enrol Cort - Minister of Finance & The Economy

Wallace Ford

MBC Interns

ED

6:30 - 7:30pm

OPENING RECEPTION

Santalais Grande

CEMENTING DIASPORA TIES

Antigua Government

Moderator

Facilitator

Sponsor

ED

6:30 - 7:30pm

Venue

Theme

Sponsor

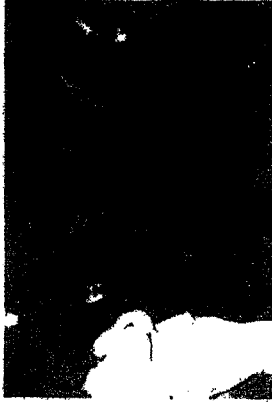
THE MISSION

- ◆ To bring together businesses, community, and government leaders interested in understanding the economic opportunities in the Caribbean marketplace locally and in the Caribbean.
- ◆ To make a global community among Diverse Business entities and The Caribbean.
- ◆ To Link the emerging markets of the U.S and the Developing Economics of the Caribbean and Latin America.



THE OPPORTUNITY

- ◆ **Marketing:** Understanding the market in the US and the Caribbean.
- ◆ **Business development:** Meeting potential customers and potential partners.
- ◆ **Strategic analysis:** Understanding the possibilities of emerging markets in the US and the Caribbean.
- ◆ **Corporate image:** Demonstrating your commitment to the Caribbean Community, and the program of diversity.
- ◆ **Community relations:** Establishing lasting relationships with key community leaders.
- ◆ **Government relations:** Meeting with and discussing topics of interest with significant elected officials from the US & the Caribbean.





Sabrina Hoising
 President, Caribbean
 News
 Moderator
 Hon. Nick Perry - New York State Assembly
 Hon. Butch Stewart - Chairman, Sandals
 Hon. Ed Towns - Member of Congress
 Hon. Harold Lowell - Minister of Tourism & Aviation
 Entertainment
 Hospitality Area
 Sandals
 Sponsors:
 Royal Caribbean Bakery
 Friday, November 9, 2007
 8:00am - 8:45am : BREAKFAST - Buffet Style
 9:00am - 6:00pm : CONFERENCE REGISTRATION
 9:00am - 10:15am : OPENING CEREMONIES
 Venue:
 Sandals Grande - Main Ballroom



THE HON. DEB ZEMKE
SPEAKERS
MEMBERS

THE HON. DEB ZEMKE
SPEAKERS
MEMBERS

Invocation

Prayers

Speakers

Eric Eyr

Karen Boykin-Tovnis

Ed Goldberg

Mark Long

Hazel Duke - NAACP

Hon. Ernest Eves
Speaker
Hon. Ernest Eves - Minister of Finance & The Economy

Hon. Donna Christensen - Member of Congress

Hon. Carolyn Cheeks Kilpatrick - Member of Congress

Ambassador Andrew Young

Hon. Louise Lake Jack - Governor General of Antigua

OR

Prime Minister Hon. Baldwin Spencer

Ribbon Cutting

1030am-11:45am - PRESENTATION

Theme: DEVELOPMENT BANKS, PRIVATE DEBT AND EQUITY



Venue: Sandals Grande
Sponsors: CTR
Hon. Clayton G. Allen - President/CEO
Sponsor: Hon. William Lacy Clay - Member of Congress
Hon. Christopher Thomas - President/CEO
Sponsor: Hon. William Lacy Clay - Member of Congress
Hon. Clayton G. Allen - President/CEO
Sponsor: Hon. William Lacy Clay - Member of Congress
Hon. Clayton G. Allen - President/CEO
Sponsor: Hon. William Lacy Clay - Member of Congress

NATIONAL SECURITY: A PRECONDITION FOR SUCCESS

Venue: Sandals Grande

Sponsors: ISBIC

Moderator: Dr. Hashi Wilson

Remarks: Reginald Canal

Keynote Speaker: Hon. Bernie Thompson - Member of Congress

Panelists:
Hon. William Lacy Clay Jr. - Member of Congress
Hon. Douma Christenson - Member of Congress
Hon. Yvette Clarke - Member of Congress
Hon. Colin V. A. Derrick - Minister of Justice



09-3696 0225



09-3698 0227

Hon. Yvette Clarke - Member of Congress
 Hon. Maxine Waters - Member of Congress
 Hon. Kendrick Mack - Member of Congress
 Hon. Yvonne Graham
 Preferred Health Partners
 Ed Goldberg
 Cheryl Monroe
 State Senator Kevin Parker
 City Councilmember William
 City Councilmember William

DIVERSITY IN GROWTH & DEVELOPMENT

MACY'S Outside Vendors

Sponsor

MAIL - IN TRANSFORMATION

- Hon. Maxine Waters - Member of Congress
- Hon. Kendrick Mack - Member of Congress
- Hon. Yvonne Graham
- Preferred Health Partners

PORT & AIRPORT SECURITY - THE MANDATES

- Moderator : Lance Ogilvie
- Hon. Bennie Thompson





09-3698 0228

Dr. Basil Wilson
 Sponser: United Health Services
 Hon. Barbara Lee - Member of Congress
 Hon. Eliot Engel - Member of Congress
 Speaker: Hon. Gregory Meeks - Member of Congress
 CARICOM REP. - TUD
 Venue: Goodworks International
 6:00pm - 8:30pm
 Venue: Off Site
 Theme: HEALTH - COMMON ISSUES - PROVEN SOLUTIONS
 Sponsor: Pfizer
 Remarks: Karen Boykin-Towns
 Moderator: Dr. Marcia Bayne Smith



09-3698 0229

Keynote Speaker: Dr. Donald Douglas, Prime Minister St. Kitts/Nevis
 Hon. Dr. Donna Christensen - Member of Congress
 Hon. Minister of Health, Ministry of Health, St. Kitts/Nevis
 Dr. Orsted Andersen
 Facilitator: MFC
 Hosts: Antigua & Barbuda
 Hospitality Area
 Sandals Grande
 Golden Krust
 MANDATORY FOR ALL MEMBERS OF CONGRESS TO ATTEND
 Venue: Off Site

Sponsor: Antigua & Barbuda

1600pm - 1900am

Venue: Hospitality Area

Sponsor: Sandals Grande

Sponsor: Golden Krust

Saturday, November 10, 2007

8:00am - 10:00am

Venue: Sandals Grande

Theme: WOMEN AND EMPOWERMENT IN THE DIASPORA

Sponsors: MACYS





Remarks - Brenda Scott - Macy
 Marilyn Johnson
 Hon. Eddie Bernice Johnson - Member of Congress
 Hon. Diane Abbott - Member of Parliament, UK
 Princess Patricia, Scotland - Member of the Royal Family
 Hon. E. J. Meehan - President, NSIC
 Governor General, Canada
 1:05pm - 1:15pm - PRESENTATION
 HEALTH - REAL INVESTMENT OPPORTUNITIES IN UPGRAIDING CARE AND DELIVERY
 Sponsors - GlaxoSmithKline, Pfizer
 Greeter - Karen Boykin-Towns - Pfizer
 Chair/Moderator - Hon. Yvonne Graham
 Keynote - Dr. Deniz Douglas - Prime Minister St. Kitts/Nevis
 Panelists - Dr. Dexter McKenzie, Hon. Donna Christensen - Member of Congress, Dr. Ledy Kerntzant, Dr. Marcia Rayne-Smith



Caribbean person - TBD

TRAVEL TOURISM EXPANSION THROUGH INNOVATION

CATALYST

Speakers: Hon. Keith Ellison - Member of Congress
 Hon. Harold Lovell, Minister of Tourism, St. Lucia
 Hon. Gregory Meeks - Member of Congress

TECHNOLOGY & COMMUNICATION - SHARING

Venue: Sandals Grande
 Sponsors: AT&T
 Remarks: Marie Long
 Keynote Speakers: Hon. Ed Towns - Member of Congress
 Hon. Eddie Bernice Johnson - Member of Congress
 Dr. Edmond Maswonn - Member of State

12:00noon - 1:15pm



Theme: INTEGRATING THE DIASPORA IN BUSINESS INVESTORS
 MANAGERS/MENTORS/ENTREPRENEURS
 Sponsor: HSBC
 Hon. Gary L. Coker - Member of Congress
 Hon. Kendrick Meek - Member of Congress
 Hon. William Lacy Clay Jr. - Member of Congress
 LUNCH
 1:30pm - 2:30pm
 Sponsors: CITI
 Remarks: Michael Hanigan
 Speakers: Eric Ewe - CITI
 Hon. William Thompson, New York City Comptroller
 2:30pm - 6:30pm
 Optional:
 3:00pm - 4:00pm ROUND TABLE





Round Table#1	<p>CARLENE A. MONTELEONE HEMISPHERIC DISASTER FUND</p> <p>Dr. Debra McKenzie</p> <p>Hon. Danny Davis - Member of Congress</p> <p>Hon. Yvette Clarke - Member of Congress</p> <p>Dr. Roy Haslick</p>
Round Table#2	<p>CLOSING THE GENERATION GAP</p> <p>Hon. Kendrick Mack - Member of Congress</p> <p>Kaelias Rodney</p> <p>Lita Bahram</p>

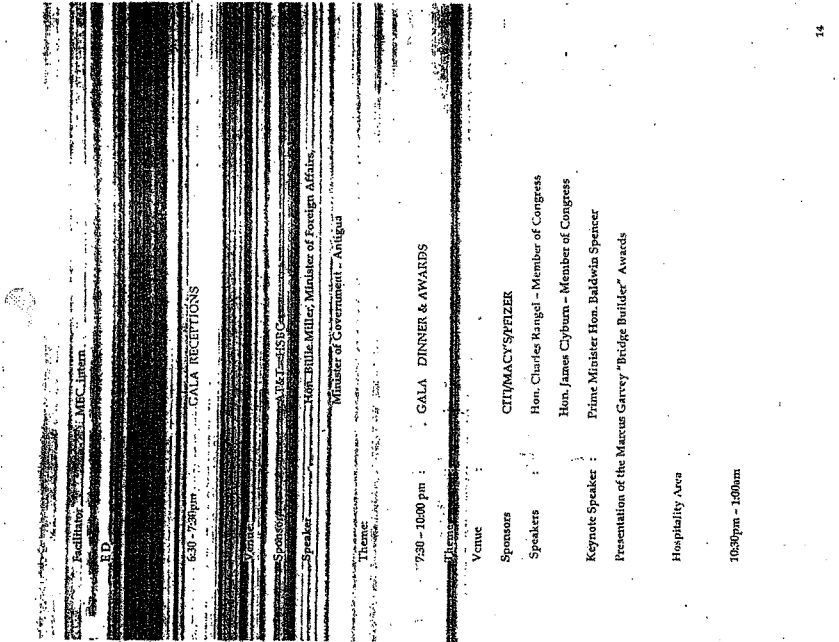


Barbara Hoag - Minister of Tourism
 William A. Johnson
 American Airline
 Hon. Gregory Mesko - Member of Congress
 Hon. Harold Lowell - Minister of Tourism
 Mr. Lloyd Williams
 CARIB NEWS
 4:00pm - 5:30pm
 EDUCATION - ACCESS AND COLLABORATION
 OFF Site
 CITY
 Michael Flanigan
 Dr. Edison Jackson - President Medgar Evers College
 Hon. Danny Davis - Member of Congress
 Hon. David M. Dinkins - Former Mayor New York City
 Hon. Eddie Bernice Johnson - Member of Congress
 Hon. Bertrand J. Joseph





09-3698 0235



14

Facilitator: J. M. B. Jern...

6:30 - 7:25pm GALA RECEPTIONS

Sponsors: ...

Speakers: Hon. Billie Miller, Minister of Foreign Affairs
Minister of Government - Antigua

7:30 - 10:00 pm GALA DINNER & AWARDS

Venue

Sponsors: CITY/MACY/SWEIZER

Speakers: Hon. Charles Kugel - Member of Congress
Hon. James Clyburn - Member of Congress
Prime Minister Hon. Baldwin Spencer

Keynote Speaker: Presentation of the Marcus Garvey "Bridge Builder" Awards

Hospitality Area

10:30pm - 1500am



Title: [REDACTED]
 Address: [REDACTED]
 Sponsor: [REDACTED] Royal Caribbean Bakery
 Sunday November 11, 2007
 8:00 am - 10:00 am
 Theme: POWER BREAKFAST
 UNDERSTANDING THE SPIRITUAL ROOTS AND
 MAKING IT WORK
 Sponsors: Golden Krust/Nancy
 Celebrant: Ed Goldberg
 Lowell Hawthorne
 Caribbean person - TBD
 Selection:

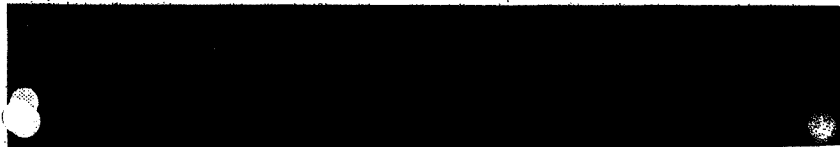
Theme:

Selection:

11:00am | Paid Trip to Montserrat - Transportation (ferry) - Lunch and
 | Special Tour. Addressed by Chief Minister Lowell Lewis

8:00 pm |

10/9/07





OFFICE OF PUBLIC SCHEDULES AND REPORTS FOR MEMBERS OF CONGRESS
 Friday, November 19, 2009

5:30 - 6:30 pm Private Widoms Receptiun with Governor General

Saturday, November 20, 2009

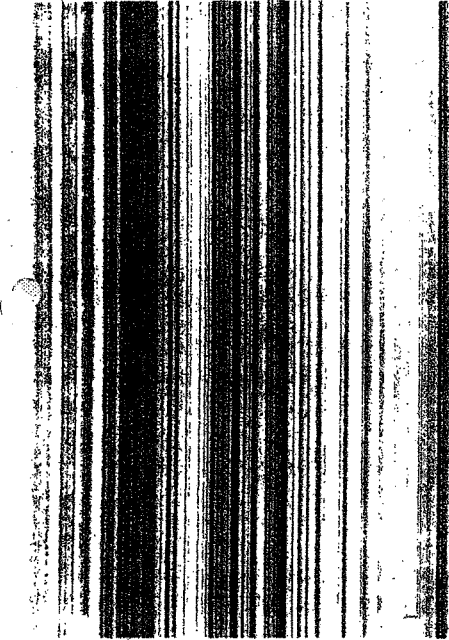
11:00 am - 1:00 pm Closed Door Meeting
 Mandatory for all Members
 Prime Ministers & Ministers of Government
 with Members of Congress
 Secretary of State - Condoleezza Rice (Invited)

5:30 pm - 6:30 pm Private Meeting with Local Elected Officials and
 the Business Community





09-3698 0238



17

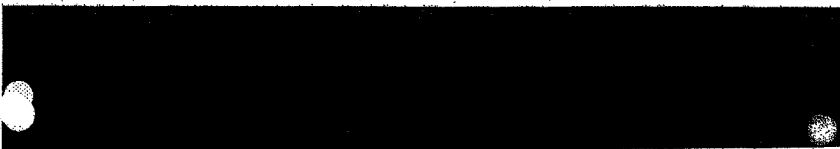


Exhibit 20

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended.

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re: Representative 1 from Macy's
Review #: 09-6333; 09-2567; 09-4403; 09-3698; 09-2222
Date: May 27, 2009
Location: 11 Penn Plaza
New York, NY 10001
Time: 11:10pm to 12:00 p.m. (approximately)
Participants: Leo Wise
Omar Ashmawy

Summary: Representative 1 from Macy's is the Senior Vice President of Government and Consumer Affairs and Diversity Vendor Development at Macy's, Inc. He was interviewed pursuant to Review 09-2567; 09-4403; 09-3698; 09-6333; and 09-2222. We requested an interview with Representative 1 from Macy's and he consented to an interview. Representative 1 from Macy's made the following statements in response to our questioning:

1. Representative 1 from Macy's was given an 18 U.S.C. § 1001 warning and consented to an interview. Representative 1 from Macy's signed a written acknowledgement of the warning. [attached]
2. Representative 1 from Macy's met Karl and Faye Rodney in 1996. As a result of the large Caribbean Community in New York City and Macy's commercial interests in the Caribbean region, Representative 1 from Macy's asked Macy's advertizing division to consider the CaribNews newspaper.
3. The first conference he attended was in 1998 in St. Lucia. He attended as a participant. At the time, Macy's was considering a store in Puerto Rico and so Representative 1 from Macy's was especially interested in business in the region. He was impressed by how many government officials from the Caribbean region were present at the conference and by what they had to say about developing relationships with the United States.

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

4. In the ensuing years, Macy's became a sponsor. The conference was a place where the company looked for vendors and designers. It was also a place where they could hear from U.S. legislators about their thoughts on the region. It was also a place for Representative 1 from Macy's to connect with U.S. companies who were attending.
5. Macy's first sponsored the conference in 2000. Over the years they have sponsored the event on an annual basis at varying levels, ranging from \$10,000 to \$35,000. As women's issues are particularly important to Macy's, given their clientele, their sponsorship focuses on the conference's "Women's Power Breakfast." The event was described as very lavish. All attendee of the breakfast also get a Macy's tote bag.
6. In 2008, Macy's contribution to the conference was \$35,000 in cash and an in-kind contribution of 400 tote bags. The total value of the in-kind contribution was \$4,620. The money was earmarked specifically for the conference.
7. As a sponsor, Macy's was given the opportunity to have a representative make opening remarks, to have representation at the Women's Power Breakfast, have input into who the speaker at the breakfast will be, and attend the closed door session with Members of Congress and officials from the Caribbean governments. Representative 1 from Macy's did in fact attend the closed door session in 2008. He recalled that other corporate sponsors also attended the meeting, but he could not recall which ones.
8. Representative 1 from Macy's recalled interacting with Representative Payne, Representative Kilpatrick, Representative Thompson, Representative Rangel, and Delegate Christensen. His interactions were all social in nature.
9. Representative 1 from Macy's was not aware of any other events sponsored by or planned by the CaribNews Foundation. With the exception of the conference, he was not aware of any other instances when Macy's supported a CaribNews Foundation event. Given Representative 1 from Macy's position within the company, it is very likely he would know if Macy's had done so.

I prepared this Memorandum of Interview on May 28, 2009 after interviewing Representative 1 from Macy's on May 27, 2009. I certify that this memorandum contains all pertinent matter discussed with Representative 1 from Macy's on May 27, 2009.

Omar Ashmawy
Investigative Counsel

OFFICE OF CONGRESSIONAL ETHICS
U.S. HOUSE OF REPRESENTATIVES

18 U.S.C. § 1001 ACKNOWLEDGEMENT

I have been provided with a copy of the text of section 1001 of title 18, United States Code (popularly known as the false Statements Act) and hereby acknowledge that it applies to any testimony or documents I provide to the Office of Congressional Ethics.

Name: _____

Signature: _____

Date: _____

5/29/08

For Office Use:

Review(s) No. _____

Exhibit 21

Updated Schedule
for Carib News
PAGE 03

18/24/2007 19:08 2129442889

WORKING DRAFT 10/22

**12th Annual Caribbean Multi-National
Business Conference Program
Antigua & Barbuda**

Thursday, November 8, 2007

12:00noon- 6:00pm :	CONFERENCE REGISTRATION -
8:00 - 6:30am	COMMUNITY OUTREACH PROGRAM
Venue	Multi-Purpose Cultural Centre - Ferry Bay, St. John's
Theme	WTO - RULES BASED TRADE & POVERTY REDUCTION
Speakers	Hon. Charles Rangol - Member of Congress Hon. Madina Waters - Member of Congress Hon. Dr. ExoI Cort - Minister of Finance & The Economy
Moderator	Tony Best
6:30- 7:30pm	OPENING RECEPTION
Venue:	Sandaln Grande - Main Ballroom
Theme:	CEMENTING DIASPORA TIES
MC:	Judge Sylvia Hinds-Radix
Speakers	Faye A. Rodney - President CARIB NEWS Hon. Yvette Clarke - Member of Congress
7:30 - 9:30 pm	
Theme:	COLLABORATIVE STRATEGIES

09-3698 0244

Venue: - Sandals Grande - Main Ballroom
 Moderator - Hon. Nick Perry, New York State Assemblyman
 Speakers - Hon. 'Butch' Stewart, Chairman, Sandals
 Hon. Ed Towns - Member of Congress
 Hon. Harold Lovell - Minister of Tourism & Aviation

10:00pm - 1:00am - Hospitality Area
 Venue: Sandals Grande - Reflective Pool

Friday, November 9, 2007

8:00am - 8:45am BREAKFAST - Buffet Style

9:00am - 6:00pm CONFERENCE REGISTRATION

9:00am - 10:15am - OPENING CEREMONIES

Venue: - Sandals Grande - Main Ballroom
 Theme: - CEMENTING DIASPORAS, COLLABORATIVE STRATEGIES

Remarks:

- Eric Eves
- Dr. Lowell Lewis, Chief Minister
 Montserrat
- Karen Boykin-Towns
- Ed Goldberg
- Marc Long
- Hazel Dukes - NAACP
- William Thompson, NYC Comptroller
- Commissioner Sarah Wescot-Williams, Leader of Govt. St. Maarten

Greetings

Speakers: Hon. Erol Cort - Minister of Finance & The Economy
 Hon. Donna Christensen - Member of Congress
 Hon. Carolyn Cheeks Kilpatrick - Member of Congress

Ambassador Andrew Young
 Hon. Louise Lake Tack - Governor General of Antigua
 OR
 Prime Minister Hon. Baldwin Spencer

Ribbon Cutting

10:30am - 11:45am - . PRESENTATION

Theme: - DEVELOPMENT BANKS, PRIVATE DEBT AND EQUITY

Venue: - Sandals Grande

Chair/Moderator - Dr. Enrique Riggs

Speaker: Hon. Maxine Waters - Member of Congress

Hon. Compton Bourne - President, CDB

Mr. Milton Lawrence, Chairman Financial Services Corporation

Mr. Rudolph Caryl

Hon. Dr. Denzil Douglas, Prime Minister/Minister of Finance, St. Kitts

10:30 - 11.45am CULTURE - PROMISE & POTENTIAL IN BUSINESS

Remarks: -

Speaker: Professor Rex Nettleford

Hon. Howard Dutton

Patrick Payne

Hon. Harold Lovell, Minister of Culture

12:00noon - 1:15pm

Theme: - NATIONAL SECURITY : A PRE-CONDITION FOR SUCCESS

Venue: - Sandals Grande

Moderator - Leyland Hazelwood

Remarks: - Reginald Canal

Keynote Speaker Hon. Bonnie Thompson - Member of Congress
Panelists: Hon. Dwyer Astaphan, Minister of National Security
 Hon. Yvette Clarke - Member of Congress
 Hon. Colin V. A. Derrick - Minister of Justice
 Attorney Sanford Rubenstein

12:00noon -1:15pm
Theme EDUCATION - U. S AND CARIBBEAN SYNERGIES TO
 OVERCOME CHALLENGES
Remarks - Colin Ward
Speakers - Dr. Edison O. Jackson, President Medgar Evers College
 Hon. Donald Payne - Member of Congress
 Hon. Bertrand Joseph, Minister of Education

1:30pm -2:50pm - LUNCHEON
Theme: - FINANCE COMMUNITY ORGANIZATION'S - VALUE
 AND ROLE
Remarks - Michael Flanigan
Speakers - Eric Iwe - CITI
 Hon. William Thompson, New York City Comptroller

3:00pm - 4:00pm - ROUND TABLES
IMMIGRATION-
Venue: - Sandals Grande
Moderator - Dr. Marcy Mason

- Speakers - Hon. Barbara Lee - Member of Congress
- Hon. Yvette Clarke - Member of Congress
- Hon. Kendall Stewart - City Council member

DIVERSITY IN GROWTH & DEVELOPMENT

MACY'S - Outside Vendors

- Ed Goldberg
- Cheryl Mantos
- State Senator Kevin Parker
- City Councilmember Inez Dickens

HAIYI - INTRANSFORMATION

- Hon. Maxine Waters - Member of Congress
- Hon. Yvonne Graham
- Ambassador Andrew Young

PORT & AIRPORT SECURITY - THE MANDATES

- Moderator - Mr. Lance Ogista
- Hon. Bennie Thompson
- Hon. Dwer Astephan
- Venue - Sardula Granda

- Participant - Preferred Health Partners

- Speakers - Hon. Barbara Lee - Member of Congress

- Venue -

Speaker - Hon. Gregory Meeks - Member of Congress ?
CARICOM REP. - TBD

5:00pm - 6:30pm -

Venue - Multipurpose Cultural & Exhibition Centre - Ferry Bay

Theme - HEALTH - COMMON ISSUES - PROVEN SOLUTIONS - MOVE
Healthy Eating, Healthy Living

Remarks - Ms. Karen Boykin-Towers

Moderator - Dr. Marcia Bayne Smith

Keynote Speakers: - Dr. Denzil Douglas - Prime Minister St. Kitts/Nevis
Hon. Dr. Martin Valdes-Preferred Health Partners
Hon. Jehu Herbert Maginley - Minister of Health, Sports & Youth
Dr. John Palmer
Hon. Diane Watson, Member of Congress

6:30:00pm - 10:00 pm - HOST COUNTRY EVENING
Hosted by Prime Minister Baldwin Spencer

Venue - Multipurpose Cultural and Exhibition Centre - Ferry Bay

10:00pm - 1:00am - Hospitality Area

Venue - Sandals Grande - Reflection Pool

Saturday, November 10, 2007

8:00am - 10:00am

Venue: - Sandals Grande - Main Ballroom
 Theme: - WOMEN AND EMPOWERMENT IN THE DIASPORA

Remarks - Brenda Scott
 MC - Marilyn Johnson
 Speakers - Hon. Diana Abbott, MP UK
 Commissioner Sarah Westcot-Williams,
 Hon. Caroline Cheeks Kilpatrick, Member of Congress
 Hon. Eddie Bernice Johnson - Member of Congress
 Dr. Marcella Maxwell
 Ms. Toni Bay
 Governor General - Dame Louise Lake Tak - check
 Ms. Lunelle McEwen, President/CEO HCCI
 Commissioner Westcot-Williams, Leader of Government

10:15am - 11:45pm

PRESENTATION
 Theme - HEALTH - REAL INVESTMENT OPPORTUNITIES IN UPGRADING
 CARE AND DELIVERY
 Venue - Sandals Grande
 Greeting - Karen Boykin-Townes - Pfizer
 Chair/Moderator - Hon. Yvonne Graham
 Keynote - Dr. Derrill Douglas - Prime Minister St. Kitts/Nevis

7

Panelists
 Hon. John Herbert McGinley, Minister of Health
 Dr. Marcia Bayne-Smith
 Dr. Carl Kenel Pierce, Preferred Health Partners

10:15am-11:45am -
 Theme - TRAVEL & TOURISM EXPANSION - THE DIASPORA AS
 CATALYST
 Venue - Sandals Grande
 Chair/Moderator - Mr. Lloyd Williams, GHCC
 Speakers - Hon. Lutra Richardson - Member of Congress
 Hon. Harold Lovell, Minister of Tourism, Antigua & Barbuda
 Hon. Howard Dotson, Director Schomburg Center

12 noon- 1.15pm - PRESENTATION
 Theme - TECHNOLOGY & COMMUNICATION -
 SHARING
 Venue - Sandals Grande
 Remarks - Ms. Marie Long
 Keynote Speakers - Hon. Ed Towns - Member of Congress
 Hon. Eddie Bernice Johnson - Member of Congress
 Dr. Edmund Menseer - Member of State
 Dr. Emmanuel Gonzalez

12:00noon - 1:15pm -
 Theme - INTEGRATING THE DIASPORA IN BUSINESS - INVESTORS
 MANAGERS, MENTORS & TRAINERS

Venue - Sandals Grande
Moderator - Roy Hastick
Participant - HSBC
Remarks - Mr. Javier Evans
Speakers - Hon. Compton Bourne
 Hon. Adolfo Carion, Bronx Borough President
 Hon. Carolyn Cheeks Kilpatrick - Member of Congress
 Hon. Professor Rex Nettleford

1:30 - 2:00 p.m. - LUNCH

Theme - CARIBBEAN TRADE COMPETITIVENESS AND POSITIONING

Venue - Sandals Grande
Remarks - Wallace Ford - Goodworks International
Keynote Speaker - Hon. Billie Miller - Minister of Foreign Affairs & Foreign Trade
 Hon. Charles Rangel - Member of Congress

2:30pm - 6:30pm
Optional
8:00pm - 8:00pm - ROUND TABLE
Venue Sandals Grande

Round Table #1

Theme : CARIBBEAN - A COMPETITIVE HEALTH CARE DESTINATION

Venue

Remarks : Dr. Lesly Kerschmitt

Speakers : Dr. Dexter McKenzie

Hon. Yvonne Graham

Round Table#2

Theme - HEMISPHERIC DISASTER FUND

Venue - Sandals Grande

Speakers Hon. Yvette Clarke - Member of Congress

Mr. Leyland Hazlewood

Mr. Emmanuel Gonsalves

Participant

Round Table#3

Theme - CLOSING THE GENERATION GAP

Speaker - Hon. Yvette Clarke - Member of Congress

Kandice Rodney

Lita Balram

Sabrina Hosang

Wintropo Wellington

Venue - Sandals Grande

Participant

Round Table #4

Theme : PASSPORT & ADMINISTRATIVE CONSTRAINTS ON TOURISM

Venue : Sandals Grande

Speakers : Hon. Harold Lovell - Minister of Tourism
Mr. Lloyd Williams, GHCC
Hon. Darcy Towns, State Assemblyman

5:00pm - 6:30pm - COMMUNITY OUTREACH -

EDUCATION & YOUTH DIRECTION - ACCESS AND
COLLABORATION

Venue : Multipurpose Cultural & Exhibition Centre

Moderator : Michael Flanagan

Speakers : Dr. Edison Jackson - President Medgar Evers College
Hon. David M. Dinkins - Former Mayor New York City
Hon. Eddie Bernice Johnson - Member of Congress
Hon. Bertrand Joseph

6:30 - 7:30pm - GALA RECEPTION

Venue : Sandals Grande

Speaker : Hon. Stephanie Tubbs-Jones, Member of Congress
Hon. Billie Miller, Minister of Foreign Affairs,
Minister of Government ... Antigua

Theme:

7:30 - 10:00 pm : GALA DINNER & AWARDS
 Theme :
 Venue : Sandals Grande - Main Ballroom
 Speakers : Hon. Charles Rangel - Member of Congress
 Hon. Maxine Waters - Member of Congress
 Keynote Speaker : Prime Minister Hon. Baldwin Spencer
 Presentation of the Marcus Garvey "Bridge Builder" Awards

Hospitality Area

10:30pm - 1:00am

Venue:

Sunday, November 11, 2007

8:30 am - 10:00am - POWER BREAKFAST
 Theme - UNDERSTANDING THE SPIRITUAL ROOTS AND
 MAKING IT WORK
 Celebrant - Ed Goldberg
 Lowell Hawthorne
 Caribbean person - TBD
 Selection
 Theme:
 Selection:

10/16/07

Exhibit 22

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re: Staff Member 1 of Congressman Rangel's Office
Review #: 09-6333; 09-2567; 09-4403; 09-3698; 09-2222
Date: May 27, 2009 and May 28, 2009
Location: Washington, DC (via telephone on May 27, 2009) and at Rayburn HOB 354 (on May 28, 2009)
Time: 4:10pm to 5:30 p.m. (approximately) and 3:30pm to 4:00pm (approximately)
Participants: Leo Wise
Omar Ashmawy

Summary: Staff Member 1 of Congressman Rangel's Office is currently the chief of staff of Representative Charles Rangel, a Member of the United States House of Representatives representing the Fifteenth District of New York. He was interviewed pursuant to Review 09-2567; 09-4403; 09-3698; 09-6333; and 09-2222. We requested an interview with Staff Member 1 of Congressman Rangel's Office and he consented to an interview. Staff Member 1 of Congressman Rangel's Office's counsel was present. Staff Member 1 of Congressman Rangel's Office made the following statements in response to our questioning:

1. Staff Member 1 of Congressman Rangel's Office was given an 18 U.S.C. § 1001 warning and consented to an interview. Staff Member 1 of Congressman Rangel's Office signed a written acknowledgement of the warning. [attached]
2. Staff Member 1 of Congressman Rangel's Office did not attend the 13th Annual Caribbean Multi-National Business Conference although he received an invitation. In response to a Request for Information by OCE, Staff Member 1 of Congressman Rangel's Office looked for Representative Rangel's invitation to the conference, but could not find it. He had thought Representative Rangel had received one, but because he could not find the invitation he now thinks that Representative Rangel did not receive one.

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3. Representative Rangel could have been invited orally as he has been attending the conference for years and was seen almost as a partner. He attends the conference because he is dedicated to strengthening the relationships between the Caribbean community, the African-American community of New York City and in general, and the United States.
4. The question of whether Representative Rangel would attend the conference in 2008 was a difficult one because of the negative press he had received throughout the preceding summer. Representative Rangel was cautious about attending because he didn't want to be a target for additional negative publicity, but Staff Member 1 of Congressman Rangel's Office and others on the Member's staff argued that he should go to the conference. They argued that if Representative Rangel did not attend he would be rejecting the friends with whom he helped build the conference and that the Member had to stand up and do the right thing despite the possible negative publicity.
5. Ultimately, Staff Member 1 of Congressman Rangel's Office and his staff persuaded the Member to attend. Representative Rangel decided to keep a low profile and, unlike in past years, staff would not attend the conference with the Member.
6. Staff Member 1 of Congressman Rangel's Office stated that the CaribNews Foundation invited the Member. The CaribNews Foundation is the charitable arm of the newspaper. When the rules changed in 2007 and corporations could not be involved as before – i.e. direct contributions to the conference – there was “talk” about how to do the conference in light of the new rules.
7. According to Staff Member 1 of Congressman Rangel's Office, there was “talk” that the Rodneys needed an entity to create a common fund so that the corporate money could be used to pay for the conference and that the CaribNews Foundation could be used for that purpose.
8. Staff Member 1 of Congressman Rangel's Office initially stated that he did not remember how he was aware of this “talk.” He stated that part of it was his reading of the rules and the supplemental material about how things get done. He then stated that “we” celebrated when Representative Susan Tubbs-Jones was made the chair of the Standards Committee in 2007 because she would try to create a way for Members of Congress to continue to attend the conference. Staff Member 1 of Congressman Rangel's Office then stated that he was made aware of the “talk” through the Rodneys and that the Rodneys told Staff Member 1 of Congressman Rangel's Office that Representative Tubbs-Jones was going to have her counsel, Dawn Kelly-Mobley, find a way to make the conference work. The Members would have a few more hoops to go through but “we” would find a

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- way. Representative Tubbs-Jones would let Ms. Mobley know the conference was a priority and tell her to make it possible. Representative Tubbs-Jones made Ms. Mobley the point of contact on the issue of the conference.
9. Staff Member 1 of Congressman Rangel's Office stated that Representative Rangel also mentioned that Representative Tubbs-Jones told him something similar. Staff Member 1 of Congressman Rangel's Office stated that there was talk about "keeping the conference going." He also stated that "They gave us the framework to keep the conference going." "They" referred to Ms. Mobley and Representative Tubbs-Jones.
 10. Staff Member 1 of Congressman Rangel's Office did not remember any specific conversations with Ms. Mobley, but he would have had them because he would have wanted to make sure he followed her advice. He stated that the 2007 conversations about Standards Committee finding a way to keep the conference going may have also been with Patricia Louis, the Rodneys office manager.
 11. Regarding the structure of the CaribNews Foundation, Staff Member 1 of Congressman Rangel's Office said that the role of the foundation was more formalized as a way to handle the new rules and that it would have come from the Standards Committee staff. The Rodneys were the first people to describe the new structure to Staff Member 1 of Congressman Rangel's Office following their conversation with Ms. Mobley. The Rodneys told Staff Member 1 of Congressman Rangel's Office that they could easily comply because they had always done the conference through the foundation. The Rodneys told him that it should have always been called the CaribNews Foundation's conference.
 12. Before 2007, Staff Member 1 of Congressman Rangel's Office knew that the corporations had a role in the conference because the format was in part to bring businesses together. Members of Congress would talk policy, but the Members' presence was the glamour part of the conference and a way to attract more people. However, policy was not the central focus of the conference. The central focus of the conference was business and increasing investment in the region. The Members of Congress drew government officials from the various Caribbean governments and these government officials drew the businesses.
 13. Staff Member 1 of Congressman Rangel's Office was aware the involvement of other corporations like AT&T, Macy's, Citi, etc because they were pretty consistent supporters of the conference. It was clear they were supporters of the conference financially.

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14. Staff Member 1 of Congressman Rangel's Office did not talk to Representative Rangel about these matters because the Member does not require that level of detail and does not typically ask for specifics.
15. Staff Member 1 of Congressman Rangel's Office did not remember how he became aware of the 2007 rule changes and did not remember attending any briefings or training about the new rules. He thought he was aware of the limits on the number of days a Member could attend an event paid for by an entity that employs a lobbyist, but he was not certain. Mr. Daley did not think he was aware of rules that made an entity that earmarked money for a trip a sponsor of that trip.
16. In response to the question: At the time of the 2007/2008 conferences, how sponsor was defined? Staff Member 1 of Congressman Rangel's Office stated that the New York CaribNews Foundation was the sponsor of the conference because they were putting on the conference with money from a general fund that would pay for the conference. At that time he became conscious of a need for a 501(c)(3) to be the sponsor.
17. Over the course of several phone calls—most often with Patricia Louis and Faye Rodney, Karl Rodney's wife—Staff Member 1 of Congressman Rangel's Office learned that the CaribNews Foundation was going to raise money from their traditional donors and other entities.
18. The government of St. Maarten was the lynchpin of the 2008 conference. They were the conference's host and they had specific requirements, as host, that were financial in nature. For instance, when a host government owns a conference center and/or hotel then they give the rooms and conference space for free. If they do not own space, then they have to arrange with a hotel to give rooms and space to the conference at an affordable amount. Other host government support includes police escorts, airport greeting services, and security services. They also host an opening reception and key components of the conference.
19. Although it was not typical, Staff Member 1 of Congressman Rangel's Office became the scheduler for Representative Rangel's travel to the conference in 2008 because he played a part in convincing him to go. Staff Member 1 of Congressman Rangel's Office made the reservations for the Member, but did not remember how he did it or whether the Representative had an e-ticket or a ticket in some other form. He did not remember receiving any airline itinerary documents, but it would have been common practice for him to receive one.

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20. Staff Member 1 of Congressman Rangel's Office was shown the pre-travel clearance form submitted to the Standards Committee and stated that he filled it out and the Member signed it. He was shown the post-travel disclosure forms that were submitted to the Standards Committee and stated that he filled them out and the Representative signed them.
21. Staff Member 1 of Congressman Rangel's Office initially said he got the information to fill out the post-travel forms from the Rodneys and stated that he remembered getting a memo from the Rodneys with the cost of the various aspects of the trip on it and that the memo was where he got the dollar amounts for the post-travel forms. He was then asked to explain why the numbers on the post-travel form matched the pre-travel form and not the memo from the Rodneys. Staff Member 1 of Congressman Rangel's Office then said that he could not say for sure that he got the numbers from the memo. He did not remember if the numbers were from the memo or from the pre-travel forms. He was not sure if he checked the cost of the airfare against the airline tickets or if he got it from the pre-travel documents or from the memo.
22. Generally speaking, however, Staff Member 1 of Congressman Rangel's Office would not look behind the numbers given by the Rodneys. He would assume the Rodneys were accurate. Staff Member 1 of Congressman Rangel's Office was not certain how it was done, but thought that the accounting for the conference was simple and the information for each Member would be the same. He did not ask the Rodneys for supporting documentation for the numbers on the memo.
23. After the conference, he spoke to Representative Rangel generally about the event. When the article by Susan Crabtree was published there was a lot of talk about the subject of the article with several people. Staff Member 1 of Congressman Rangel's Office did not remember with whom he spoke. He then said that he spoke with the Rodneys and the Member. Overall there was an opinion that there could not be anything substantive to the article because the travel was approved by the Standards Committee. It was true that the corporations were at the conference, but they did not have anything to do with their Washington, DC agenda because that's not who attended the conference. His conversations with Representative Rangel were brief and were limited to reassuring him that the office followed the rules and got approval for the travel.
24. After the OCE review was initiated Staff Member 1 of Congressman Rangel's Office called other members of the Congressional Black Caucus. Representative Rangel asked him to make the calls and to tell them that he would stand by them and offered his help.

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

25. Staff Member 1 of Congressman Rangel's Office recalled a conversation with Representative Carolyn Kilpatrick's chief of staff, Kim Rudolph. Ms. Rudolph addressed the comments that Representative Kilpatrick made in which she thanked the sponsors of the conference. Staff Member 1 of Congressman Rangel's Office explained Representative Kilpatrick's statements to OCE by saying that that regardless of who the real sponsor of the event was, when Members thank the corporations it helps the Rodneys put on the conference -- even if the sponsors are not sponsors under the rule. Staff Member 1 of Congressman Rangel's Office also remembered speaking to Shelly Thomas, Delegate Donna Christensen's scheduler, but did not recall the specifics of the conversation.
26. Staff Member 1 of Congressman Rangel's Office was not aware of any limits on a private foundation paying for overseas travel. He did not know whether the CaribNews Foundation was a private foundation or a public charity.
27. Staff Member 1 of Congressman Rangel's Office was shown a copy of Congressman Rangel's itinerary and a receipt for an electronic ticket. Staff Member 1 of Congressman Rangel's Office stated that he did not remember seeing it before, but that the itinerary was the type of document that would typically be placed in the Congressman's briefing book so that he could provide the information at the airport in order to get his ticket. Staff Member 1 of Congressman Rangel's Office also pointed out that the receipt for the electronic ticket was the sort of document that would only be provided after the Congressman checked in for his flight.

I prepared this Memorandum of Interview on May 28, 2009 after interviewing Staff Member 1 of Congressman Rangel's Office on May 27, 2009. I certify that this memorandum contains all pertinent matter discussed with Staff Member 1 of Congressman Rangel's Office on May 27, 2009.

Omar Ashnawy
Investigative Counsel

Exhibit 23



**THE NEW YORK
CARIBNEWS**
THE WEEKLY VOICE OF THE CARIBBEAN-AMERICAN COMMUNITY
7 WEST 30TH STREET, 4th FLOOR, NEW YORK, NY 10011

TEL: (212) 944-1991; FAX: (212) 944-2089
E-MAIL ADDRESS: NYCARIB@AOL.COM;
CARIBNEWS@ATT.NET

FACSIMILE TRANSMITTAL SHEET

TO: Kelly Mobley	FROM: Patricia Louis
COMPANY: Committee on Standards of official conduct	DATE: 8/20/08
FAX NUMBER: 202-225-7392	TOTAL NO. OF PAGES INCLUDING COVER:
RE: 2008 MULTINATIONAL BUSINESS CONFERENCE	

URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY YOUR INFORMATION

Following is the completed form and attachments re travel for Members of Congress to attend the 2008 Multinational Business Conference scheduled for November 6-9, 2008 in St. Maarten.

Regards

09-3698 0264

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ON 000410



*Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10017
Tel: (212) 944-1991; Fax: (212) 944-2089
E-mail: info@caribnewsconference.com*

CARIB NEWS FOUNDATION is organized to provide education and information about the Caribbean in the area of Business, Education, Health and Culture, Promote Good neighborly within the United States and the hemisphere.

The participants are selected to participate in the various workshops during the Conference based on their demonstrated interest, expertise and assignment in the United States Congress.

Organized by Carib News Foundation. A non-profit project 501-C3 corporation

09-3698 0265

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CM 000443

U.S. House of Representatives
Committee on Standards of Official Conduct

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM
(provide directly to each House invitee)

This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers or employees under House Rule XXV, clause 5. A completed copy of the form (and any attachments) should be provided to each invited House Member, officer or employee, who will then forward it to the Committee. The trip sponsor should NOT submit the form directly to the Committee.

Private sponsors are urged to submit this form to each House invitee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the invitee not receiving approval for the trip. The submission of an incomplete form will delay the review process. Before completing this form, sponsors are urged to carefully review the Committee's private travel guidelines and advisory memoranda detailing the rules and restrictions for private travel, as well as the instructions for completing this form. Sponsors should call the Committee with any questions prior to submitting the form. Please type form.

1. Sponsor(s) (who will be paying for the trip): CARIB NEWS FOUNDATION

2. I represent that the trip will not be financed (in whole or in part) by a federally-registered lobbyist or a registered foreign agent (signify "yes" by checking box):

3. I represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip (signify "yes" by checking box):

4. Is travel being offered to an accompanying family member of the House invitee(s)? Yes No

5. Provide names and titles of ALL House invitees; for each invitee, provide explanation of why the individual was invited (include additional pages if necessary): BASED ON COMMITTEE OR SUB-COMMITTEE WHICH IMPACTS US/CARIBBEAN RELATIONS ON WHICH THE MEMBER SERVES.

6. Dates of travel: NOVEMBER 8-9, 2008

7. Cities of departure - destination - return: VARIES - DEPENDING ON MEMBER

8. Attached is a detailed agenda of the activities taking place during the travel (i.e., an hourly description of planned activities) (signify "yes" by checking box):

9. I represent that (check one of the following):
 - a. The sponsor of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965: or
 - b. The sponsor of the trip does not retain or employ a federally registered lobbyist or registered foreign agent: or
 - c. The trip is for attendance at a one-day event and lobbyist involvement in planning, organizing, requesting, or arranging the trip was *de minimis* under the Committee's travel regulations.

10. If travel is for participation in a one-day event (i.e., if you checked Question 9(c)), check one of the following:
 - a. One-night's lodging and meals are being offered: or
 - b. Two-nights' lodging and meals are being offered:
 If "b" is checked, explain why the second night is warranted: _____

09-3698 0266

CONFIDENTIAL

CM 000444

11. If the trip is not sponsored by an institution of higher education, I represent that a federally-registered lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip (*signify "yes" by checking box*):
12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip: _____
 CARIB NEWS FOUNDATION (* SEE ATTACHED)
13. Describe each sponsor's organizational interest in the purpose of the trip: _____
 THE INTEREST OF CARIB NEWS FOUNDATION IS TO PROMOTE, INFORM, TRADE AND ESTABLISHMENT OF MEANINGFUL CONNECTIONS BETWEEN THE U.S AND THE CARIBBEAN
14. Describe the type and class of the transportation being provided. Indicate whether coach, business-class or first-class transportation will be provided. In addition, for travel via aircraft, please indicate if travel is being offered on a commercial flight, chartered flight or on an aircraft operated or paid for by a carrier not licensed by the Federal Aviation Administration to operate for compensation or hire (i.e., a private aircraft). If first-class fare is being provided, or if travel is via chartered or private aircraft, please provide an explanation describing why such travel is warranted: _____
 REGULAR SCHEDULED AIR SERVICE, ECONOMY CLASS
15. I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s). (*signify "yes" by checking box*):
16. I represent that either (*check one of the following*):
 a. The trip involves an event that is arranged or organized *without regard* to congressional participation and that meals provided to congressional participants are similar to those provided to or purchased by other event attendees: *or*
 b. The trip involves events that are arranged or organized *specifically with regard* to congressional participation:
 If "b" is checked, detail the cost per day of meals (approximate cost may be provided): _____
17. Reason for selecting the location of the event or trip: SEE ATTACHED
18. Name of hotel or other lodging facility: SONESTA MAHO BEACH RESORT
19. Cost per night of hotel or other lodging facility (approximate cost may be provided): \$110.00
20. Reason(s) for selecting hotel or other lodging facility: HAS APPROPRIATE MEETING ROOMS

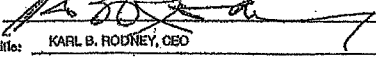
21. TOTAL EXPENSES FOR EACH PARTICIPANT:

<input type="checkbox"/> actual amounts <input type="checkbox"/> good faith estimates	Total Transportation Expenses per Participant	Total Lodging Expenses per Participant	Total Other Expenses per Participant
For each Member, Officer, or employee	410	260	145
For each accompanying family member	410	0	145

	Other Expenses (dollar amount)	Identify Specific Nature of "Other" Expenses (e.g., taxi, parking, registration fee, etc.)
For each Member, Officer, or employee	\$150	Conference Registration
For each accompanying family member	\$ 25	Local transportation

22. I represent that reimbursement for miscellaneous travel expenses for the trip, such as travel to and from airports, security costs, interpreter fees, visa application fees, and similar expenses, will be for actual costs incurred and are necessary for the purpose of the trip (signify "yes" by checking box): Yes

23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: 
 Name and title: KARL B. RODNEY, CEO
 Organization: CARIB NEWS FOUNDATION
 Address: 7 WEST 36th STREET, 8th FLOOR, NEW YORK, NY 10018
 Telephone number: (212) 944-1991
 Fax number: (212) 944-2099
 Email Address: CARIB-DESK@ATT.NEY

The Committee staff may contact the above individual above if additional information is required.

If there are any questions regarding this form please contact the Committee at the following address:

Committee on Standards of Official Conduct
 U.S. House of Representatives
 HT-2, The Capitol
 Washington, DC 20515
 (202) 225-7103 (phone)
 (202) 225-7392 (general fax)
 (202) 226-7172 (fax for travel approvals)

Version date 4/2007 by Committee on Standards of Official Conduct

MEMBERS OF CONGRESS INVITED TO THE
THIRTEENTH ANNUAL MULTI-NATIONAL BUSINESS
CONFERENCE, NOVEMBER 6-9, 2008, ST. MAARTEN, N.A.

Congresswoman Diane E. Watson
Congressman David Scott
Congressman James Clyburn
Congresswoman Nydia Velazquez
Congressman Charles Rangel
Congressman Donald Payne
Congresswoman Donna M. Christensen
Congressman Edolphus Towns
Congressman G. K. Butterfield
Congressman Gregory Meeks
Congressman Jesse Jackson Jr.
Congressman Keith Ellison
Congressman Kendrick Meek
Congresswoman Maxine Waters
Congressman Melvin Watt
Congressman Robert Scott
Congressman William Lacy Clay
Congresswoman Barbara Lee
Congresswoman Caroline Cheeks Kilpatrick
Congresswoman Corrine Brown
Congresswoman Eddie Bernice Johnson
Congresswoman Sheila Jackson Lee
Congresswoman Yvette Clarke
Congressman Danny Davis
Congressman Bennie Thompson
Congresswoman Laura Richardson

July 2008

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Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10017
Tel. (212) 944-1999; Fax (212) 944-2089
E-mail: info@caribnewsconference.com

Item #12

CARIB NEWS FOUNDATION is organized to provide education and information about the Caribbean in the area of Business, Education, Health and Culture, Promote Good neighborly within the United States and the hemisphere.

The participants are selected to participate in the various workshops during the Conference based on their demonstrated interest, expertise and assignment in the United States Congress.

Item #17

A Caribbean country whose proximity to other Caribbean Countries makes it conveniently located for delegates from the other Caribbean countries to attend.

Organized by Carib News Foundation. A non-profit project 501-C3 corporation

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**MEMBERS OF CONGRESS INVITED TO THE
13th Annual Multinational Business Conference
St. Maarten, November 6-9, 2008**

Congressman William Lacy Clay
U.S House of Representatives
131 Cannon HOB
Washington, DC 20515
Phone: 202-225-2406
Fax: 202-226-3717

Congresswoman Diane E. Watson
US House of Representatives
125 Cannon HOB
Washington , DC 20515
Phone: 202-225-7084
Fax: 202-225-2422

Congressman Kendrick Meek
U.S House of Representatives
1039 Longworth HOB
Washington, DC 20515
Phone: 202-225-4506
Fax: 202-226-0777

Congressman David Scott
U.S House of Representatives
417 Cannon HOB
Washington, DC 20515
Phone: 202-225-2929
Fax: 202-225-4268

Congressman James Clyburn
US House of Representatives
2135 Rayburn HOB
Washington, DC 20515
Phone: 202-225-3315
Fax: 202-225-9253

Congressman Robert Scott
U.S House of Representatives
1201 Longworth HOB
Washington, DC 20515
Phone: 202-225-8351
Fax: 202-225-8354

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ON 000410

Congresswoman Nydia Velaquez
U.S House of Representatives
2241 Rayburn HOB
Washington, DC 20515
Phone: 202-225-2361
Fax: 202-226-0327

Congressman Charles Rangel
U.S House of Representatives
2354 Rayburn HOB
Washington, DC 20515-3215
Phone: 202-225-4365
Fax: 202-225-0186

Congressman Donald Payne
U.S House of Representatives
2209 Rayburn HOB
Washington, DC 20515
Phone: 202-225-3436
Fax: 202-225-4160

Congresswoman Donna M. Christensen
U.S House of Representatives
1510 Longworth HOB
Washington, DC 20515
Phone: 202-225-1790
Fax: 202-225-5517

Congressman Edolphus Towns
U.S House of Representatives
2232 Rayburn HOB
Washington, DC 20515
Phone: 202-225-5936
Fax: 202-225-6018

Congressman G. K. Butterfield
U.S House of Representatives
413 Cannon HOB
Washington, DC 20515
Phone: 202-225-3101
Fax: 202-225-2256

Congressman Gregory Meeks
U.S House of Representatives
1710 Longworth HOB
Washington, DC 20515
Phone: 202-225-3461
Fax: 202-225-4169

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Congressman Jesse Jackson Jr.
 U.S House of Representatives
 2419 Rayburn HOB
 Washington, DC 20515
Phone: 202-225-0773
Fax: 202-225-0899

Congressman Keith Ellison
 U.S House of Representatives
 1130 Longworth HOB
 Washington, DC 20515
Phone: 202-225-4755
Fax: 202-225-4886

Congressman Kendrick Meek
 U.S House of Representatives
 1039 Longworth HOB
 Washington, DC 20515
Phone: 202-225-4506
Fax: 202-225-0777

Congresswoman Maxine Waters
 U.S House of Representatives
 2324 Rayburn HOB
 Washington, DC 20515
Phone: 202-225-2201
Fax: 202-225-7854

Congressman Melvin Watt
 U.S House of Representatives
 2236 Rayburn HOB
 Washington, DC 20515
Phone: 202-225-1510
Fax: 202-225-1512

Congresswoman Barbara Lee
 U.S House of Representatives
 2444 Rayburn HOB
 Washington, DC 20515
Phone: 202-225-2661
Fax: 202-225-9817

Congresswoman Caroline Cheeks Kilpatrick
 U.S House of Representatives
 1610 Longworth HOB
 Washington, DC 20515
Phone: 202-225-2261
Fax: 202-225-5730

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Congresswoman Corrine Brown
 U.S House of Representatives
 2444 Rayburn HOB
 Washington, DC 20515
Phone: 202-225-0123
Fax: 202-225-2256

Congresswoman Eddie Bernice Johnson
 U.S House of Representatives
 1511 Longworth HOB
 Washington, DC 20515
Phone: 202-225-8885
Fax: 202-225-1477

Congresswoman Sheila Jackson Lee
 U.S House of Representatives
 410 Canon HOB
 Washington, DC 20515
Phone: 202-225-3816
Fax: 202-225-3317

Congresswoman Yvette Clarke
 U.S House of Representatives
 1029 Longworth HOB
 Washington, DC 20515
Phone: 202-225-6231
Fax: 202-225-0112

Congressman Danny Davis
 U.S House of Representatives
 1222 Longworth HOB
 Washington, DC 20515
Phone: 202-225-5006
Fax: 202-225-5641

Congresswoman Stephanie Tubbs-Jones
 U.S House of Representatives
 1516 Longworth HOB
 Washington, DC 20515
Phone: 202-225-7032
Fax: 202-225-1539/2367

Congressman Bennie Thompson
 US House of Representatives
 2432 Rayburn HOB
 Washington, DC 20515
Phone: 202-225-5876
Fax: 202-225-5898

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Working Copy

13th Annual Caribbean Multi-National
Business Conference Program
St. Maarten, N.A.

**THEME: A REGION IN TRANSITION – STRATEGY FOR
CHANGE – BUILDING ALLIANCES**

Thursday, November 6, 2008

12:00 noon – 6:00pm : CONFERENCE REGISTRATION-

5:00 – 6:30 - TOWN HALL FORUM - HEALTH

Healthy Eating and Living

Innovative Solutions for Life styles

Diseases- a Collaborative Approach – Diabetes,
Hypertension, Obesity, Oral Health

Venue - ROYAL ISLANDER
Moderator - Dr. Marcia Bayne Smith

Speakers - Mrs. Karen Boykin-Towns
Congressmember Dr. Donna Christian Christensen
Comimissioner Maria Buncamper Molanus, Health
Commissioner, St. Maarten
Dr. Leon Merrick
Dr. Jay Cohan
Dr. John Palmer

6:30- 7:30pm - OPENING RECEPTION

Venue - UPPER POOL

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Theme: - *A REGION IN TRANSITION*
 Speakers: - Faye A. Rodney
 Hon. Roy Marlin - Commissioner for Tourism & Finance - St
 Maarten.

MC: - Sabrina Hosang - Royal Caribbean Bakery
 7:30 - 9:30 pm - OPENING DINNER

Venue: - MAHO ROOM

Theme: - *STRATEGY FOR CHANGE*
 MC - Judge Sylvia Hinds-Radix
 Speakers: - Susan Taylor
 Hon. Donald Payne, Member US Congress

10:00pm - 1:00am: - HOSPITALITY AREA

Friday, November 7, 2008

8:00am - 8:45am - (BREAKFAST) - OCEAN TERRACE

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9:00am - 6:00pm	CONFERENCE REGISTRATION OCEAN TERRACE LOBBY CONFERENCE SECRETARIAT SABA ROOM
-----------------	---

9:00am - 10:15am - **OPENING CEREMONIES**

Venue: - **MAHO ROOM**

Theme: - **BUILDING ALLIANCES FOR PROGRESS**

Invocation: - **Rev. Susan Johnson-Cook**

Anthems: - **St. Maarten**
Lift Every Voice

Remarks: - **Eric Eye**
Karen Boykin-Towns
Marie Long
Ed Goldberg
Patrick Gaston
Hazel Dukes

Speakers: - **Hon. Carolyn Checks Kilpatrick -- Member**
US Congress
Commissioner Sarah Wescot-Williams, Leader
of Government, St. Maarten
Harry Belafonte

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RIBBON CUTTING CEREMONIES

10:15am - 10:30am - COFFEE BREAK -

10:30am - 11:45am - PRESENTATION

EDUCATION - TECHNOLOGICAL ADVANCES - COLLABORATION

Moderator - Dr. Emmanuel Gonsalves
 Greetings - Marie Long
 Speakers - Dr. Edison Jackson
 Patrick Gaston
 Dr. Marcia Keizz
 Congressmember Eddie Bernice Johnson
 Professor Rex Nettleford

12:00 noon - 1:15p.m. PRESENTATION

TRAVEL AND TOURISM***A Transformative Approach***

Moderator - Lloyd Williams
 Greetings - Wallace Ford
 Speakers - Commissioner Roy Marlin
 Howard Dodson
 Congressman Gregory Meeks
 Professor Rex Nettleford
 Dr. Martin Valdes

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12:00 noon - 1:15p.m - PRESENTATION
**HEALTH - AN ECONOMIC DEVELOPMENT
STRATEGY FOR THE REGION**

Greetings - Karen Boydin-Townis

Moderator - Yvonne Graham

Speakers - Dr. Denzil Douglas
Dr. Carl Kenel Pierre
Commissioner Maria Buncamper Molanus, Health
Commissioner, St. Maarten
Dr. Dexter McKenzie

1:30pm - 2:30pm - LUNCHEON

Venue: - Main Ballroom

Theme: - **BUILDING A WINNING STRATEGY - PARTNERSHIPS
THAT WORK**

Moderator: - Hon. Nick Perry, NYS Assembly

Speakers - Eric Eve

Keynote Speaker - Hon. David Paterson, Governor New York State

3:00pm - 4:00pm

Round Table # 1 -

Theme - **EDUCATION - THINKINITY PRESENTATION &
DEMONSTRATION**

Venue - Royal Islander A
 MC - Dr. Patricia Hazlewood
 Speakers - Patrick Gaston
 Albert Browne

Round Table #2 --

Theme - *LOCAL BUSINESS INITIATIVES*
 Opportunities with US Companies

Venue - Royal Islander B
 Speakers: - Ed Goldberg
 Eric Eve
 Albert Browne

4:30pm - 6:00pm - *TOWN HALL FORUM - EDUCATION*

Venue - Royal Islander A
 Theme : *EDUCATION - SHARING WORKING SOLUTIONS*
 Greetings : Michael Flanigan
 Moderator : Dr. Marcella Maxwell

Speakers: - Hon. David M. Dinkins - Former Mayor, NYC
 Dr. Edson O. Jackson
 Dr. Marcia Kelz
 Professor Rex Nettleford, UWI
 William Payne, Assemblyman New Jersey

Venue:
6:30:00pm - 7:30pm - *HOST COUNTRY EVENING*

Venue:

Theme

MC:

Speakers:

7:30 - 8:00 pm:

8:00pm - 10:30 pm.

CULTURAL PRESENTATION

Venue :

Theme

10:00pm - 1:00am - *HOSPITALITY AREA*

Venue:

Saturday, November 8, 2008

7:45 am - 8:15 am = BREAKFAST

Venue - OCEAN TERRACE

8:30am - 10:00am - PRESENTATION

Theme WOMEN OF INFLUENCE AND POWER

Venue: - MAHO BEACH

- Greetings & Opening Remarks -** - **Brenda Scott**
- Moderator** - **Marilyn Johnson**
- Speakers:** - **Commissioner Sarah Wescot-Williams, Leader of Government Business**
Dame Billie Miller, former Deputy Prime Minister, of Barbados
Dr. Marcia Keiza, President York College
Michelle Paterson, First Lady New York State
Congresswoman Eddie Bernice Johnson
Rev. Dr. Susan Johnson-Cook
- 10:15am - 11:45am** - **PRESENTATION**
- Theme** - **THE CARIBBEAN, IT'S VALUE & POTENTIAL**
- Venue** - **Royal Islander A**
- Greetings** - **Wallace Ford**
- Moderator** - **Dame Billie Miller**
- Speakers** - **Hon. P. J. Patterson, former Prime Minister, Jamaica**
Hon. Dr. Ralph Gonsalves, Prime Minister St. Vincent and the Grenadines
Hon. Dr. Denzil Douglas, Prime Minister, St. Kitts-Nevis
Congressman Charles Rangel
- 12:00 noon - 1:30 p.m.** - **PRIVATE MEETING - CLOSED DOOR SESSION**
with Members of Congress and Ministers of Government

12:00 noon - 1:15p.m.	PRESENTATION
Theme	- <i>TRADE & INVESTMENT - CREATIVE SOLUTIONS</i> <i>RETOOLING FOR GROWTH - PARTNERSHIP AT WORK</i>
Venue	- Royal Islander A
Greetings	- Michael Flanigan
Moderator	- Ivanhoe Friend
Speakers	- Adolfo Carrion, Borough President, Bronx, New York Compton Bourne, President Caribbean Development Bank - Congressman Edolphus Towns - Eric Eve
12:00 noon - 1:15pm	PRESENTATION
Theme	- <i>Hemispheric Security - Ports/Airports -</i> <i>Crime - Drugs - Disaster</i>
Venue	- Royal Islander B
Greetings	- Earl Brown, Deputy Borough President, Bronx - Judge Sylvia Ash
Moderator	- Tony Best
Speakers	- Congressman Bennie Thompson - Commissioner Theo Heyliger, St. Maarten - Professor Ivelaw Griffith - Hon. Lance Oglete, Brooklyn District Attorney
1:30pm - 2:30 pm	LUNCHEON
Venue	- MAHO ROOM

Theme: **CARIBBEAN -- A SOLID INVESTMENT**

Greetings **Hon. Darryl Towns**

Speakers **Hon. William Thompson, NYC Comptroller**
Dr. Compton Bourne, President CDB

Round Table #1 **- IMMIGRATION/DEPORTees**

Venue **- Royal Islander A**

Moderator **- Dr. Marco Mason**

Speakers **Congressman Bennie Thompson**
Hon. Eddie Bernice Johnson, Member US Congress
Attorney Stanford Rubenstein
NYC Councilmember Dr. Kendall Stewart

Round Table#2: **- HAITI -- BOLD INITIATIVES -- THE DIASPORA-**
CBC AND CARICOM

Venue **- Royal Islander B**

Moderator **- Hon. Yvonne Graham**

Speakers **- Hon. Charles Rangel**
Hon. Gregory Meeks
Hon. Ralph Gonsalves
Dr. Lesly Kernisant

4:30 pm -- 6:00pm **TOWN HALL FORUM - TECHNOLOGY**

Venue: **Royal Islander A**

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Greetings & Opening - Marie Long

Moderator - Colin Ward

Speakers - Congressman Edolphus Towns
Albert Brown
Commissioner of Technology

6:30 - 7:30pm GALA RECEPTION

Speakers - Susan Taylor

7:30pm - 10:00pm - GALA DINNER & AWARDS PRESENTATION

Speaker - Dr. Harry Belafonte
Hon. Sarah Wescot-Williams, Leader of Government
Business

AWARDS PRESENTATION

ENTERTAINMENT

10:30pm - 1:00am - HOSPITALITY AREA

Venue: HOTEL CONFERENCE ROOM

Sunday, November 9, 2008

8:30 am - 10:00am - POWER BREAKFAST

Theme: - *SPIRITUALITY - THE BASICS IN BUSINESS*
Greetings *Lowell Hawthorne*
Speakers - Ed Goldberg
Selection: - Local Choir

October 13, 2008

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Exhibit 24

10/21/2008 13.08 FAX 1039190281 AMERICAN AIRLINES 0002/002

2611 JEFF DAVIS 204 ARLINGTON, VA 22202 800-433-7300

SALES PERSON: GC ITINERARY DATE: 27 OCT 08
 CSRXG PAGE: 01

TO: ATTN SHELLEY 202-225-5517-FAX
 CARIB NEWS ATTN PATRICIA LOUIS 212-944-2089-FAX

FOR: CHRISTENSEN/DONNA NON

08 NOV 08 - THURSDAY

AIR AMERICAN AIRLINES FLT:5013 ECONOMY
 OPERATED BY AMERICAN EAGLE/EXECUTIVE
 LV ST CROIX 1100A EQP: ATR72 TURBOPROP
 42MIN
 NON-STOP

AR SAN JUAN PR 1142A
 ARRIVE: TERMINAL D
 CHRISTENSEN/DON SEAT-1B AA-Y3R5588

AIR AMERICAN AIRLINES FLT:5032 ECONOMY
 OPERATED BY AMERICAN EAGLE/EXECUTIVE
 LV SAN JUAN 1235P FOOD FOR PURCHASE
 DEPART: TERMINAL D PR 142P EQP: ATR72 TURBOPROP
 01HR 07MIN
 NON-STOP
 AR ST MAARTEN 142P
 CHRISTENSEN/DON SEAT-2C AA-Y3R5588

*****CARIB NEWS*****
 10/27- AIRFARE 381.50 ONE WAY COACH. THE 5 PERCENT
 DISCOUNT FROM THE CONTRACT HAS BEEN APPLIED.
 THANKS,
 DONNA
 ELECTRONIC TICKET
 10/27 - ATTN FAX - CONGRESSMAN'S HUSBAND NOT ATTENDING.

Do not staple in this area. Staple HERE ATB2.

PASSENGER TICKET AND BAGGAGE CHECK
 ELECTRONIC TICKET
 PASSENGER RECEIPT FOR US
 2706708 800212

AMERICAN AIRLINES
 NOT VALID FOR TRAVEL THROUGHOUT YOUR JOURNEY

STAPLE HERE ATB2

INSERT

6TX RR Y/SW R15.00 RR SW1ST.50/28/42/18/300.00/END R01 1.00 XFLH.5

TAXES
 LED 387.00
 AY 5.00
 SA 5.00
 ME 4.50
 381.50

00112184722126 001 2190158857 2 001 2190158857 2

American Airlines
 SAN JUAN PR
 NOT VALID FOR TRAVEL

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CN-000108

Confirm-res@Latairline.com

Page 1 of 4

Page 2 of 4

7 west 36th street
new york, 10019

Confirmation Number: TC2TDF
Booking Date: 27Oct08

Agent Number: 6535
Booked By: Afaasha

ITINERARY: MRS. D CHRISTENSEN

Date	Flt	Depart	Arrive	Stops
Sat 08Nov08	550	SXM - ST. NAARFEN 12:10pm	STT - ST. THOMAS 12:55PM	0

Fare and Charges Detail:		Total For 01 guest(s)	Fare:	112.00
			Passenger Facility Charge:	7.00
			Airport Development Tax:	5.00
			Airport Authority Taxes:	9.35
			Airport Passenger Taxes:	30.00
			Fuel & Insurance Surcharge:	34.50
			Total:	\$197.85

Payment(s):

Master Card: \$197.85-

Balance Due: \$0.00

NOTE - Terms & Conditions

All Fares and Charges listed on the Itinerary are in United States Dollars (USD) and are subject to daily going currency exchange rates.

Promotion Terms & Conditions for special discounts and/or offers supersede applicable items in the General Terms & Policies.

All Fares are non-refundable, but may be retained in a Credit Facility, to expire one year from the cancellation date. The credit can only be applied to bookings for the passenger(s) it was created for. Most Fares are subject to Change/Cancellation Fees plus any difference in fare of the new itinerary. This may be done up to three(3) hours prior to departure time. Passengers who fail to change/Cancel flights will forfeit the fare paid. [n.b. Some Fares DO NOT Permit any Changes/Cancellations or Credit whatsoever]. For detailed fare rules associated with your specific booking please contact our reservations center (<http://www.latairline.com/contact.html>). You may also review the fare rules by accessing your booking information via our website (www.latairline.com) and clicking on the "my bookings" button on the navigation menu.

LATA is now a low cost carrier and as a consequence does not provide flight connections or baggage transfer to other carriers. It is the passenger's responsibility when making bookings to allow adequate time for baggage collection and rechecking if connecting to another carrier. We recommend at least 150 minutes between international connecting flights.

<http://webmail.att.net/wm/en-US/n/wm/12757655501592702?cmd=Print&sid=c0&folde...> 10/28/2008

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CN-000109

Exhibit 25



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of the
General CounselOffice of the
Secretary
Washington, D.C.
20201

June 2, 2000

MEMORANDUM

TO: Deputy Ethics Counselors
National Institutes of Health

FROM: Karen Santoro
Ethics Counsel

SUBJECT: Outside Activities of NIH Employees with Foundations

Recently, a provision of the Internal Revenue Code has been brought to my attention that has serious ramifications for NIH employees who have previously received approval to engage in outside employment activities with private foundations. The statute imposes a tax on "each act of self-dealing between a disqualified person and a private foundation." 26 U.S.C. § 4941(a)(1). This statute, which was enacted in 1969, was intended to curb private foundations' attempts to influence Government officials. The Internal Revenue Service has issued a number of revenue rulings with respect to Government employees and prospective activities with private foundations.

Issue: The Internal Revenue Service imposes an individual penalty tax of up to 200% of the amount of compensation from a private foundation to certain Government officials conducting outside activities with these foundations.

Conclusion: Certain Government officials should refrain from accepting compensation (other than travel expenses within the United States) for outside activities with private foundations.

Discussion: Specifically, the statute imposes a tax on each act of self-dealing by a disqualified individual equal to five percent of the amount involved for each year in the taxable period. 26 U.S.C. § 4941(a)(1) [1]. In any case in which an initial tax is imposed on an act of self-dealing which is not corrected within the taxable period, a tax equal to 200 percent of the amount involved will be imposed on the disqualified person. 26 U.S.C. § 4941(b)(1)(2).

The Code defines "self-dealing" as any direct or indirect agreement by a private foundation to make any payment to certain enumerated government officials. 26 U.S.C. § 4941(d)(1)(F) [3]. Government officials who are "disqualified persons" within the scope of this restriction are elective officials, Presidential appointees, Schedule C employees, and individuals compensated at or above GS-15-7 levels, irrespective of their appointment mechanism (Title 42, SBRS, Commissioned Corps), and personal or executive assistants or secretaries to any of the foregoing. 26 U.S.C. § 4946(c). Excluded from the definition of government employees is a "special governmental employee" as defined in 18 U.S.C. § 202 (a)(4); Treas. Reg. 53.4946-1(a)(1).

Also excluded from the definition of self-dealing are agreements to employ an individual for any period after the termination of his government service if that individual is terminating his government service within a 90 day period. 26 U.S.C. § 4941 (d)(1)(F). For purposes of the statute, a "private foundation" has the same meaning as in 26 U.S.C. § 509. A website for obtaining the status of a foundation can be found at http://www.irs.us/treas.gov/bus_info/efo/efosearch.html.

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Government officials who are within the scope of this statute will be required to pay the tax only if the individual participates in the act of self-dealing knowing that it is an act of self-dealing. 26 U.S.C. § 4941 (a)(1). The regulations define "knowing" to include those situations when: the individual has actual knowledge of the facts that such a transaction would be self-dealing; he is aware that the act violates Federal tax law governing self-dealing; and he negligently fails to make reasonable attempts to ascertain whether the act is an act of self-dealing or he is in fact aware that it is an act of self-dealing. Treas. Reg. § 53.4941 (a)(1)-(b)(3). The burden is thus on the individual to determine whether he or she is liable under the statute.

An individual's participation in an act of self-dealing will not be considered "knowing" if the individual, after full disclosure of the factual situation to legal counsel, relies on the advice of counsel expressed in a "reasoned written legal opinion" that an act is not an act of self-dealing within the meaning of the statute, even if the act is subsequently determined to be self-dealing. Treas. Reg. § 53.4941(a)(1)-(b)(6).

Finally, a tax for self-dealing will not be imposed under the following circumstances: certain nontaxable prizes and awards if the recipients are selected from the general public; nontaxable scholarships and fellowship grants; qualifying annuity plans; contributions or gifts not exceeding an aggregate of \$25; payments made under the government employee training program in 5 U.S.C. Ch. 41; and payment of travel expenses within the United States. 26 U.S.C. § 4941 (d)(2)(B); Rev. Rut. 131, 1974-2 C.B. 385.

As a result of this statute, NIH employees paid at or above the GS 15-7 level are effectively prohibited from receiving compensation from a private foundation for activities such as teaching, writing, advising, or consulting. The Internal Revenue Service may serve a deficiency notice upon an employee, who would then be forced to pay the tax or contest the assessment.

Effective immediately, all requests for approval of outside activities must be reviewed in accordance with the statutory provision at 26 U.S.C. § 4941. The compensation level of the individual requesting approval must be considered in conjunction with an analysis of the nature of the private entity offering the opportunity for compensation. Previously approved outside activities with foundations for NIH employees who are paid at or above the GS 15-7 level should be reviewed to determine the status of the foundation. Should the status of the foundation be private, any affected employee must be advised to either accept only travel expenses within the United States for his/her service or resign from such service. Employees who have questions whether payment to them by a private foundation constitutes acts of self-dealing should consult private counsel.

For your information, the Foundation for the National Institutes of Health (FNIH) and the Foundation for Advanced Education in the Sciences (FAES) are. For your information, the Foundation for the National Institutes of Health (FNIH) and the Foundation for Advanced Education in the Sciences (FAES) are not considered private foundations for purposes of this prohibition.

The NIH Office of the Legal Advisor has reviewed and concurs in this opinion.

cc: Robert Lanman, Stephen Benowitz

[1] When a tax is imposed on a self-dealer, a corresponding tax of 2.5 percent is imposed on any foundation manager unless the participation by the foundation manager is not willful and is due to reasonable care. 26 U.S.C. § 4941(a)(2). A maximum tax of \$10,000 may be imposed. 26 U.S.C. § 4941 (c) (2).

[2] The "taxable period" is defined as the period beginning with the date on which the act of self-dealing occurs, and ending on the earliest of: the date that a deficiency notice is mailed by the I.R.S.; the date on which the tax is assessed; or the date on which the correction of the act of self-dealing is completed. 26 U.S.C. § 4941 (e), Treas. Reg. § 53.4941 (e) -1 (a) (1). As with the initial tax, a corresponding additional tax of 50 percent will be imposed on any foundation manager who refuses to agree to the correction. 26 U.S.C. § 4941 (b) (2). As with the initial tax, the penalty on a foundation manager is limited to \$10,000. 26 U.S.C. § 4941 (c) (2)

[3] The statute also defines "self-dealing" to include: the sale or exchange, or leasing, of property; the lending of money or other extension of credit; the furnishing of goods, services, or facilities; payments to a disqualified person as defined in 26 U.S.C. § 4946 (a) (such as substantial contributors, foundation managers, holders of 20 percent of the voting power or beneficial interests; family members of disqualified individuals, or a corporation, partnership, or trust holding a 35 percent interest); and transfer to or use by a disqualified person of the foundation's income or assets. 26 U.S.C. § 4941 (d).

[4] 18 U.S.C. § 202 (a) defines "special Government employee" as temporary employee appointed for a term not to exceed 130 days, a part-time U.S. commissioner or magistrate, a part-time member of Congress, or a Reserve or National Guard officer.

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BY HAND DELIVERY

October 23, 2009

Clifford Stoddard, Committee Counsel
U.S. House of Representatives
Committee on Standards of Official Conduct
Washington, DC 20513-0328

Re: Review No. 09-3698
Rep. Donna M. Christian Christensen

Dear Mr. Stoddard:

The following is Representative Donna M. Christian Christensen's response to the Report and Findings and Citations to Law (Report) the Office of Congressional Ethics (OCE).

The Report asserts that there is a substantial reason to believe that her participation in the 13th Annual Multi-National Business Conference in St. Maarten, N.A., from November 6-9, 2008, her acceptance of payment or reimbursement of expenses to attend the conference, and her post travel disclosure form filed with the Office of the Clerk violated various provisions of House Rule XXV, Section 5(b).

The allegations are:

1. That Rep. Christian Christensen failed to identify the "true, correct, and accurate" sponsor of her travel "to the best of her knowledge" on her Member Post Travel Disclosure Form;
2. That she violated House Rule XXV, Section (5)(b)(1)(C) by accepting trip related reimbursements from entities that employ or retain lobbyists for participating in a event for more than one day;
3. That she violated House Rule XXV, Section 5(h)(1)(1)(B) by underreporting the value of the travel reimbursement she received to attend the 13th Annual Multi-National Business Conference; and

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4. That Carib News Foundation's payment of travel expenses for the conference and Representative Christian Christensen's acceptance of such payments violated the Internal Revenue Code.

Procedural Issues

At the outset, it appears that there may be procedural flaws in this matter which would have resulted in the proceedings being terminated on March 25, 2009. As is stated in the procedural history at p. 6 of the Report, a preliminary review commenced on March 6, 2009 following a written request for review by two OCE Board members. The Board Members' request was made on February 23, 2009. Procedurally a second phase review of the matter must be initiated within thirty days from the request for a preliminary review, or March 25, 2009. The vote to initiate a second-phase review in the matter did not occur until March 27, 2009.

Assuming that the second-phase review was properly initiated and the proceedings did not terminate on March 25, 2009, the second-phase review was to be concluded by May 25, 2009. Interviews were conducted as part of the second-phase review through May 27, 2009.

Assuming that this matter is not procedurally defective, Representative Christian Christensen denies each of the allegations posed against her in this referral to the Committee on Standards of Official Conduct for further review.

Sponsorship of the Conference

With regard to the first allegation, Representative Christian Christensen asserts that the information on her Post Travel Disclosure form was true, correct and accurate to the best of her information and belief. Before, during and after the 13th Annual Multi-National Business Conference in St. Maarten (2008 Conference), she had a bona fide and reasonable belief that the Carib News Foundation (CNF) was the sponsor of the conference and the source of payment of the trip, i.e., her travel expenses. When she completed the Member Post Travel Disclosure Form she did not know or have reason to know that an entity other than CNF "paid for her trip."

If CNF was the only sponsor, there was no misstatement on the Post Travel Disclosure Form. If CNF misled the Committee and there were in fact other sponsors but Representative Christian Christensen had no reason to know this, there was no knowing misstatement and the information she submitted was true, correct, and accurate **to the best of her knowledge.**

The Report sets out extensive information and allegations that CNF and others provided misleading information to the Standards Committee in 2007 and 2008 concerning sponsorship of the conference and the earmarking of funds for Members travel. Although the Board of the OCE does not have jurisdiction over conduct occurring prior to March 11, 2008, it states that these 2007 events are relevant to the Standards Committee's

review of CNF's Private Sponsor Travel Certification Form for the 2008 conference and its approval of Representative Christian Christensen's proposed trip.

The Report devotes significant discussion to the efforts of CNF and others to present CNF as the sole sponsor of the conference in order to comply with changed travel regulations becoming effective in 2007. See pages 24 through 44. These efforts influenced the Standards Committee's review process in both 2007, a time frame over which this body does not have jurisdiction, and 2008 and effected its approval of Representative Christian Christensen's privately funded travel to both conferences. It is of note that the Board itself acknowledges that Representative Christian Christensen was not involved in the review process. Neither she nor members of her staff had any communication with the Standards Committee, its former Chair or the former Chair's counsel in connection with the 2007 or 2008 review process and had no knowledge or reason to know about the process. This topic does not involve Representative Christian Christensen to any degree.

Representative Christian Christensen complied with the regulations and requested authorization by the Standards Committee prior to traveling to St. Maarten. She relied on the approval communicated by the letter of 10/16/2008 stating:

Pursuant to House Rule 15, clause 5(d)(2), the Committee on Standards of Official Conduct hereby approves your proposed trip for you and your spouse to St. Maarten, N.A. scheduled for November 6 and 8, 2008 sponsored by the Carib News Foundation.

The Board admits that her reliance was reasonable "to a point." However, it alleges that she should have known that CNF was not the only sponsor of her trip through subsequent events that she was able to observe personally at the conference. This allegation is based on the fact that: representatives of corporations were present at the conference; that signs at the conference displayed corporate logos; and that speakers at the conference thanked sponsors, using the plural form of the word sponsor.

CNF specifically informed Representative Christian Christensen that it was the sponsor of her trip and the Standards Committee's approval letter confirmed that CNF was the sponsor who paid for her trip. She did observe the presence representatives of corporations at the conference and banners containing their logos and believed that this indicated the corporations were supporters of the Foundation and were conference participants. In light of the approval letter from the Standards Committee she had no reason to believe that these corporations or any entity other than CNF provided funds "earmarked" to pay her travel or trip expenses. She had no knowledge of or reason to know about fund raising efforts by Carib News and CNF vis a vis the conference. She had no knowledge, nor should she reasonably be expected to have knowledge, of the financial situation including net assets of the CNF or the movement of funds for the conference or other purposes between CN and CNF. Having other corporations thanked for their support of CNF and/or the conference did not give rise to a "should have known" standard that these entities provided funds "earmarked" for her travel/trip.

Question #5 on the Post-Travel Disclosure Forms asks “Sponsor(s) (who paid for the trip)” Representative Christian Christensen answered “Carib News Foundation.” This information was “true, correct and complete” to the “best of [her] knowledge at the time she signed it.

Representative Christian Christensen reasonably understood the inquiry “who paid for your trip” to refer to who paid her travel expenses. Her understanding that trip expenses referred to the general out of pocket costs related to attendance at a conference was bona fide and reasonable. In footnote 3, on page 8, the Board states that “travel expenses” and “trip expenses” are used interchangeable and then provides a construction, not consistent with common usage of “trip” and “travel” expenses, that these terms refer to the conference as a whole. According to this construction any corporate funds used to support the conference, especially those donated to support the conference, are “earmarked” for Members’ travel.

The fact that the letter from the Standards Committee informed Representative Christian Christensen the “proposed trip” to St. Maarten “sponsored by the Carib News Foundation” was approved did not put her on notice, as the Board argues, that any funds from donors supporting the conference would be considered “earmarked” for her **travel or trip expenses** and subject to disclosure requirements. Since the definition of “trip” within the context of the inquiry “who paid for your trip,” was not before the Committee and, in fact, had not been raised in any context, this letter cannot be used to support the position articulated in Footnote 3. If this is the interpretation of disclosure rules going forward, Representative Christian Christensen will comply. However, it was not her reasonable understanding at the time she completed the Post Travel Disclosure Form.

Her understanding is consistent with the House Ethics Manual wherein it is stated:

The rule and implementing regulations are concerned with the organizations(s) or individual(s) that actually pay for travel. Thus, for example, when a non profit organization pays for travel with donations that were earmarked, either formally or informally, for the trip, each such donor is deemed a – private source for the trip and (1) must be publically disclosed as a trip sponsor on the applicable travel forms and (2) must itself be required to satisfy the above standards on proper sources of travel expenses.

To the extent that the term “travel expenses” has been previously defined it is in House Rule 25, Section 4 (c):

In this rule the term “travel expenses” means with respect to a Member, Delegate, Resident Commissioner, officer, or employee of the House, or a relative of such Member, Delegate, Resident Commissioner, officer, or employee, the cost of transportation, and the cost of lodging and meals while away from the residence or principal place of employment of such individual.

Representative Christian Christensen had no knowledge that any funds donated to CNF were “earmarked” either formally or informally, **for the trip** and thus deemed a private source for the trip and subject to disclosure. She was not privy to CN’s or CNF’s fundraising efforts set out in pages 15 through 21 of the report. Observing the presence of corporate participants and representatives of the government of St. Maarten at the conference and hearing them thanked for their participation and support did not give rise to a rational inference that any of these entities had provided funds “earmarked” for Members’ travel and she did not draw any such inference.

Her understanding before, during and after the conference was that her travel (trip) expenses had been paid by CNF, a 501(c)(3) organization. To the best of her knowledge neither Carib News, nor its foundation, hired lobbyists and were not foreign agents. She was aware that corporations gave money to the CNF and had representatives attending the conference in 2008, as they had for the past thirteen years. She observed nothing to indicate that any entity other than CNF, including these corporations and the government of St. Maarten, specifically provided funds for her travel (trip) expenses or for the travel (trip) expenses of other Members. To the best of her knowledge, none of the corporations participated in planning of the conference and its agenda and none of them have requested the presence of Members of congress, arranged for, or reimbursed their trips. To the best of her knowledge, the only role of the government of St. Maarten was to host a reception/dinner that was part of the conference and was open to all attendees and invited local guests.

Acceptance of Trip-Related Reimbursements from Entities that Employ Lobbyists

The second allegation is that Representative Christian Christensen accepted trip-related reimbursements from entities that employ or retain lobbyists for participating in an event for more than one day. As stated above, she reasonably believed that the only sponsor “who paid for her trip” was Carib News Foundation. She reasonably relied on the CNF’s statements and the approval of her trip by the Standard’s Committee from November 6 through November 8, 2008.

She did not know of Carib News Foundation’s fund raising efforts in support of the conference. If, in fact, other entities were paying for her trip, she had no knowledge of that matter. Further, she is not responsible for and cannot be held accountable for any misrepresentations that may have been made to the Standards Committee by CNF or counsel to the former chair of the Committee regarding sponsorship of the conference or funds earmarked to pay for Members’ travel.

The Carib News Foundation does not employ lobbyists. Representative Christian Christensen reasonably believed that CNF was the sponsor paying for her trip based on the letter from the Committee approving the trip and the information provided to her after her trip by CNF detailing the travel/trip expenses that it had paid on her behalf during her two day stay at the conference. These expenses included transportation, lodging, and food. She therefore had no reason to believe that House Rule XXV(b)(1)(C) applied to

this travel. If it is true that organization employing lobbyists earmarked donations for her travel/trip expenses, she like the Standards Committee was misled and cannot be held responsible for an inadvertent violation of the rule.

Accuracy of the Information Provided as to the Value of Reimbursed Expenses.

Representative Christian Christensen did not pay any of the “reimbursed” expenses directly. She received correspondence from the CNF addressed directly to her on 11/18, 2008 stating that the “breakdown of value” for her travel was airfare - \$410, hotel - \$270, and registration/transportation - \$175. She reasonably relied on this and entered this information on her Post-Travel Disclosure Form. She assumed that this information was an accurate reflection of her airfare and two nights stay in the hotel. She had advised CNF that she would be staying two nights and the Foundation made her travel arrangements as they had every year. She did not have contact with the airlines or hotel regarding charges or fees and had no reason to doubt the accuracy of CNF’s representations. She had no way of knowing what CNF represented to Reps. Rangel, Thompson, Payne and Kilpatrick regarding the “breakdown of value” of their trips.

CNF apparently provided the Board with copies of Representative Christian Christensen’s tickets from St. Croix to St. Maarten and from St. Maarten to St. Thomas totaling \$578 rather than the \$410 the Foundation reported to her. She acknowledges this discrepancy. However, she does not recall seeing a ticket that contained fare information prior to reviewing the Board’s exhibits to the Report and Findings. She does not recall having seen a hotel bill. She did not have a copy of the ticket or receipt when preparing the Post Travel Disclosure Form. The only documentation of expenses in her possession was the communication from CNF.

The rules require that members give a “good faith” estimate of travel and lodging expenses. That is what she did, based on the material provided to her by CNF.

CNF’s Status a Private Foundation

It is alleged that CNF’s status as a private foundation precludes its ability to pay for Members’ overseas travel. Prior to receiving the Report and Finding and consulting with counsel, Representative Christian Christensen knew only that CNF was a 501(c)(3) organization and was not aware of the difference between a private foundation and a public charity. It is the Standards Committee that approved its payment of travel/trip expenses for Members to the 2008 conference. Neither Representative Christian Christensen nor other Members had a role in this determination, which may have been erroneous. The Report notes on p. 5 that a limitation on CNF’s ability to pay for overseas travel of government officials does not implicate her.

Conclusion

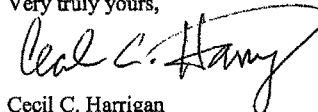
In the penultimate paragraph of the report it is states:

...these facts show failures at multiple points by multiple parties in complying with and enforcing the travel rules. Inaccurate information was provided by CNF to Members and the Standards Committee. Delegate Christensen certified inaccurate information to the Standards Committee and failed to disclose the number of family members accompanying her. The counsel to the former Chair of the Standards Committee intervened in the review process in a way that both frustrated the process in 2007 and set a pattern of obfuscation that continued in 2008. Finally, the Standards Committee appears unaware of the limitations on the ability of private foundations to pay for overseas travel by Members.

As discussed above, Representative Christian Christensen has no responsibility for these "failures at multiple points." She is not responsible for inaccurate information provided by CNF on which both the Standards Committee and Members relied. She had nothing to do with and no knowledge of improper intervention and obfuscation in the process by which the Standards Committee reviewed the issue of sponsorship of the conference and the reimbursement of Members' travel/trip expenses. She cannot be faulted because the Standards Committee appears unaware of the limitations on the ability of private foundations to pay for overseas travel and thus approved such payments. To the extent that she certified inaccurate material she, like the Standards Committee, relied on inaccurate material provided to her by CNF. At no time did she fail to disclose the number of family members accompanying her. The record shows that she initially anticipated that her spouse would accompany her and this was approved by the Standards Committee. He did not attend. No expenses were paid on his behalf and the Post-Travel Disclosure Form certified no family member accompanied her.

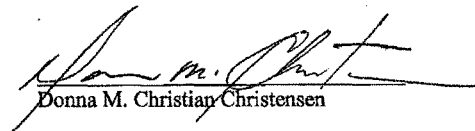
Thank you for your opportunity to respond to the Report and Findings of Fact and Citations to Law.

Very truly yours,



Cecil C. Harrigan

I have reviewed the above response prepared by my counsel, Cecil C. Harrigan, and I affirm under penalty of perjury that the information contained therein is true and correct to the best of my information and belief, this 26 day of October, 2009.



Donna M. Christian Christensen

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111th CONGRESS, 1st SESSION
U.S. HOUSE OF REPRESENTATIVES
COMMITTEE ON STANDARDS OF OFFICIAL CONDUCT

**Investigation into Officially Connected Travel of House Members to Attend the Carib
News Foundation Multinational Business Conferences in 2007 and 2008.**

Appendix B

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS

U.S. HOUSE OF REPRESENTATIVES

REPORT

Review No. 09-2567

The Board of the Office of Congressional Ethics, by a vote of no less than four members, on May 29, 2009 adopted the following report and ordered it to be transmitted to the Committee on Standards of Official Conduct of the U.S. House of Representatives.

SUBJECT: Representative Carolyn Cheeks Kilpatrick

NATURE OF THE ALLEGED VIOLATION: There is substantial reason to believe that Congresswoman Carolyn Cheeks Kilpatrick's participation in the 13th Annual Caribbean Multi-National Business Conference in St. Maarten, N.A. from November 6-9, 2008, her acceptance of reimbursement of expenses to attend that conference and the Member Post Travel Disclosure Form she filed violated various provisions of House Rule XXV Section 5(b).

RECOMMENDATION: The Board of the Office of Congressional Ethics recommends that the Committee on Standards of Official Conduct further review the above described allegations concerning Congresswoman Kilpatrick.

VOTES IN THE AFFIRMATIVE: 6

VOTES IN THE NEGATIVE: 0

MEMBER OF THE BOARD OR STAFF DESIGNATED TO PRESENT THIS REPORT TO THE STANDARDS COMMITTEE: Leo Wise, Staff Director & Chief Counsel.

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FINDINGS OF FACT AND CITATIONS TO LAW

Review No. 09-2567

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OFFICE OF CONGRESSIONAL ETHICS
U.S. HOUSE OF REPRESENTATIVES

FINDINGS OF FACT AND CITATIONS TO LAW

Review No. 09-2567

On May 29, 2009 the Board adopted the following findings of fact and accompanying citations to law, regulations, rules and standards of conduct (*in italics*). The Board notes that these findings do not constitute a determination that a violation actually occurred.

I. INTRODUCTON

1. Congresswoman Carolyn Cheeks Kilpatrick attended the 13th Annual Caribbean Multi-National Business Conference in St. Maarten, N.A., from November 6-9, 2008. Congresswoman Kilpatrick received funds from a private source to participate in the conference.

A. Summary of Allegations

2. There is substantial reason to believe that Congresswoman Kilpatrick violated the requirement that she identify the “true, correct and accurate” sponsor of her travel “to the best of her knowledge” on her Member Post Travel Disclosure Form. While forms submitted to her office and the Standards Committee before the conference identified one entity as the sponsor—the Carib News Foundation—once at the conference, Congresswoman Kilpatrick was presented with indications that other corporations—including Citigroup, IBM, AT&T, Pfizer, Macy’s and Verizon Foundation—were also sponsors. In fact, Representative Kilpatrick, in remarks at one of the conference sessions, personally thanked “the sponsors” after the corporations were identified as such. Those indications proved to be true—the corporations were in fact sponsors of Congresswoman Kilpatrick’s travel according to House travel rules because the corporations had donated funds specifically for the conference (i.e. earmarked funds). Further, events that occurred in 2007 affected the Standards Committee’s ability to determine whether the corporations were sponsors in 2008:
 - a. In 2007, the House of Representatives changed the rules governing travel. Those changes placed limitations on the number of days Members of Congress could participate in events (such as conferences) when their travel was sponsored by an

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entity that employs or retains a lobbyist. These changes affected the annual Caribbean Multi-National Business Conference. In 2007, the Carib News Foundation continued to identify the corporations as sponsors on the conference agenda and on a draft version of the Private Sponsor Travel Certification Form prepared for submission to the Standards Committee for approval. However, after interacting with the counsel to the then-Chair of the Standards Committee, and apparently without the knowledge of the staff attorney reviewing the trip, the documents identifying the corporations as "sponsors" were changed and their sponsorship was not disclosed.

- b. The 2007 conduct and attendant misrepresentations appear to have directly influenced what occurred in 2008. When the Carib News Foundation submitted materials to the Standards Committee for their approval of the 2008 conference, the Carib News Foundation took the same approach and did not disclose the role of the corporate sponsors on the forms they submitted to the Standards Committee.
3. There is substantial reason to believe that Congresswoman Kilpatrick violated House Rule 25, clause 5(b)(1)(C) by accepting trip-related reimbursements from entities that employ or retain lobbyists for participating in an event for more than one day.
4. There is substantial reason to believe that Congresswoman Kilpatrick violated House Rule 25 clause 5(h)(i)(1)(B) by underreporting the value of the travel reimbursements she received to attend the 13th Annual Caribbean Multi-National Business Conference.
5. There is substantial reason to believe that Congresswoman Kilpatrick violated the limitation that a Member may only bring one family member with them on privately sponsored travel, described in the House Ethics Manual at page 101, by bringing both her daughter and granddaughter to the conference. The Board further notes that Congresswoman Kilpatrick failed to disclose that her daughter and granddaughter were accompanying her on the trip.
6. There is substantial reason to believe that the Carib News Foundation's payment of travel expenses for Representative Kilpatrick and her acceptance of payment violated the Internal Revenue Code. As stated above, Carib News Charities, the name previously held by the 501(c) organization now known as the Carib News Foundation, is listed as a private foundation in the Internal Revenue's cumulative list of charitable organizations, Publication 78. Therefore, the Standards Committee should not have approved the trip because the funds came from a prohibited source.

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B. A Note on Culpability

7. These findings fall into four categories: (1) the sponsor or sponsors, as the case appears to be, of the conference; (2) the intervention of the counsel to the former Chair of the Standards Committee in the Standards Committee's review process of the conference in 2007 and how it affected the information before the Standards Committee in 2008; (3) the accuracy of the value of the reimbursement submitted by Congresswoman Kilpatrick and (4) whether, because of its tax status, the Carib News Foundation could lawfully pay for Congresswoman Kilpatrick's conference-related expenses.
8. While all these topics are relevant, the Board notes that they do not all involve conduct by Congresswoman Kilpatrick to the same degree.
 - a. As to topic 1, determining the identity of the true sponsor or sponsors implicates the conduct of both Congresswoman Kilpatrick and the Standards Committee. Congresswoman Kilpatrick told the OCE she relied on the Standards Committee to make that determination. It is the Board's view that the Member's approach is reasonable to a point. Once Congresswoman Kilpatrick arrived at the conference, however, she was confronted with information that other corporations were co-sponsors. That information, at least in 2008, does not appear to have been before the Standards Committee when they initially approved the 2008 travel.
 - b. As to topic 2, the intervention of the counsel to the former Chair of the Standards Committee in the Standards Committee's review of the 2007 conference did not involve Congresswoman Kilpatrick. Nonetheless, it directly bears on whether and to what extent the Standards Committee could determine the true sponsor of the conference in 2008.
 - c. As to topic 3, the accuracy of the information Congresswoman Kilpatrick provided as to the value of the reimbursement of her conference-related expenses most directly implicates her conduct. The post-travel disclosure form that all Members must file when they accept privately sponsored travel is signed and certified by Members. The form puts the obligation on Members, not staff, not the Standards Committee and not sponsors, to certify that the information on the form is "true, accurate and complete" to the "best of the Member's knowledge." Congresswoman Kilpatrick saw the value of her travel and retained copies of documents that showed its true value in her office files. Nonetheless, she certified inaccurate information on the post-travel disclosure form.
 - d. As to topic 4, limitations on Carib News Foundation's ability to pay for overseas travel of government officials, Congresswoman Kilpatrick told the OCE she was

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unaware of any such limitations. The Board finds this statement to be credible. Nonetheless, the law prohibits such payments. Therefore, the Board feels compelled to include a discussion of this issue in this referral.

C. Jurisdictional Statement

9. The allegations that are the subject of this review concern Representative Carolyn Cheeks Kilpatrick, a Member of the United States House of Representatives from the 13th District of Michigan. The Resolution the United States House of Representatives adopted creating the Office of Congressional Ethics directs that, “[n]o review shall be undertaken...by the board of any alleged violation that occurred before the date of adoption of this resolution.”¹ The House adopted this Resolution on March 11, 2008. Because the conduct under review occurred or relates to actions taken after March 11, 2008, review by the Office of Congressional Ethics is in accordance with the Resolution.

D. Procedural History

10. A preliminary review in this matter commenced on March 6, 2009 following a written request by at least two members of the OCE Board which was made on February 23, 2009.
11. At least three members of the Board voted to initiate a second-phase review in this matter on March 27, 2009. The Board voted to extend the second-phase review by 14 days, as provided for under the Resolution, on April 24, 2009.
12. The second-phase review ended on May 26, 2009.
13. The Board voted to refer the matter to the Standards Committee for further review on May 29, 2009.
14. The OCE requested documents from and interviews with representatives of:
- (1) Representative Sheila Jackson-Lee’s Congressional office;
 - (2) the Verizon Foundation;
 - (3) Citibank;
 - (4) American Airlines;

¹ House Resolution 895 of the 110th Congress, Section 1(e).

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- (5) IBM;
- (6) Macy's, Inc;
- (7) Pfizer;
- (8) AT&T;
- (9) Representative Kilpatrick's Congressional office;
- (10) Representative Payne's Congressional office;
- (11) Representative Rangel's Congressional office;
- (12) Representative Thompson's Congressional office;
- (13) Delegate Christensen's Congressional office;
- (14) The Carib News; and
- (15) The Carib News Foundation

II. Multiple Entities, Including CARIB NEWS (the Newspaper), the Government of St. Maarten and Several Corporations, Sponsored Representative Kilpatrick's Trip

15. *Under House Rule 25 clause 5(d), Members are required to obtain prior approval of the Standards Committee for trips where the Member's travel expenses will be reimbursed by a private source. The Standards Committee has adopted regulations, pursuant to House Rule 25 clause 5(h)(i)(1)(B)² that requires Members to identify the "sponsor(s)," i.e. the party reimbursing travel expenses, for any trip where the payor is a private entity.*
16. There is substantial reason to believe that Congresswoman Kilpatrick violated the requirement that she identify the "true, correct and accurate" sponsor of her travel "to the best of her knowledge" on her Member Post Travel Disclosure Form. While forms submitted to her and the Standards Committee before the conference identified one sponsor—the Carib News Foundation—once at the conference, Congresswoman Kilpatrick was presented with evidence that other corporations were sponsors. As will be discussed below, those indications proved to be true—the corporations were in fact

² House Rule 25(5)(h)(i)(1)(B) directs the Standards Committee to establish, "regulations describing the information it will require individuals subject to this clause to submit to the committee in order to obtain the prior approval of the committee for any travel covered by this clause . . ." On February 20, 2007, the Committee issued guidelines and regulations concerning the travel restrictions and requirements.

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sponsors of Congresswoman Kilpatrick's travel according to House travel rules because the corporations had donated funds specifically for the conference (i.e. earmarked funds).

A. Representative Kilpatrick's Knowledge of The Involvement of These Corporations in the Conference

17. On her Member Post-Travel Disclosure Form, Congresswoman Kilpatrick listed Carib News Foundation as the only sponsor of her travel to and participation in the 13th Annual Caribbean Multi-National Business Conference in St. Maarten, N.A. (hereafter "the trip" or "conference"³) in November 2008.⁴

HAND DELIVERED	
<input checked="" type="checkbox"/> Original <input type="checkbox"/> Amendment U.S. House of Representatives 110 th Congress MEMBER / OFFICER POST-TRAVEL DISCLOSURE FORM	
FEDERAL RESOURCE CENTER 2008 NOV 20 PM 1:56 HOUSE OF REPRESENTATIVES	
<small>This form is for disclosing the receipt of travel expenses from a private source for meetings, speaking engagements, fact-finding trips or similar events in connection with official duties. You need not disclose government-funded or political travel on this form, or travel that is unrelated to official duties. This form does not eliminate the need to report all privately-funded travel on the Member or officer's annual Financial Disclosure Statement. In accordance with clause 2 of House Rule 25, complete this form and file it with the Clerk of the House of Representatives, B-106 Cannon House Office Building, within 15 days after travel is completed. The Clerk is to make these forms available to the public as soon as possible after they are received.</small>	
1. Name of Traveler:	<u>Carolyn Cheeks Kilpatrick</u>
2. a. Name of Accompanying Family Member (if any):	<u>Marsha Cheeks</u>
b. Relationship to Member/Officer: <input type="checkbox"/> Spouse <input type="checkbox"/> Child <input checked="" type="checkbox"/> Other (specify):	<u>Sister</u>
3. a. Date of Departure and Date of Return:	<u>Departs Nov 6, 2008, Return - Nov 9, 2008</u>
b. Dates at personal expense (if any):	<u>None</u>
4. Itinerary (cities of departure - destination - return):	<u>- Attached -</u>
5. Sponsor(s) (who paid for the trip):	<u>Carib News Foundation</u>

³ The "Member/Officer Post-Travel Disclosure Form" asks the filer at question 5, "Sponsor(s) (who paid for the trip)." This in turn raises the question, is a conference a "trip" or is a trip limited to the travel expenses associated with attending the trip, e.g., transportation, lodging and meal expenses? The House Ethics manual and the relevant forms use the terms "travel" and "trip" interchangeably. For example, the relevant form is called a Member/Officer Post-Travel Disclosure Form" (emphasis added). The introductory paragraph on the form provides, "[t]his form is for disclosing the receipt of travel expenses from a private source for meetings, speaking engagements, fact-finding trips or similar events in connection with official duties" (emphasis added). However, question 9 on the form asks the filer to detail, "TRIP EXPENSES" and uses as an example, "registration fees." Registration fees are not "travel" expenses unless one defines travel (or a trip) to include participating in a conference. The Board uses the term "trip" to include the conference. The Board also notes that the Standards Committee treated the conference as the "trip" in its letter of October 21, 2008 pre-approving Congresswoman Kilpatrick's trip.

⁴ Member/Officer Post-Travel Disclosure Form signed by Representative Carolyn Cheeks Kilpatrick (Nov. 20, 2008) (Exhibit 1 at 09-2567 0002).

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18. Congresswoman Kilpatrick certified that this information was "true, correct and complete" to the "best of [her] knowledge."⁵

I certify that the information contained in this form is true, complete, and correct to the best of my knowledge. I have determined that all of the expenses listed above were necessary and that the travel was in connection with my duties as a Member or Officer of the U.S. House of Representatives and would not create the appearance that I am using public office for private gain.

SIGNATURE OF MEMBER: _____

Carolyn C. Kilpatrick

DATE: *Nov. 19, 2008*

19. In an interview with the OCE, Representative Kilpatrick confirmed it was her signature on this document.⁶
20. Prior to the conference, Karl Rodney, the CEO of the Carib News Foundation, submitted a Private Sponsor Travel Certification Form to Congresswoman Kilpatrick, which she in turn submitted to the Standards Committee, which identified the Carib News Foundation as the sponsor of the trip.⁷

<p>U.S. House of Representatives Committee on Standards of Official Conduct</p> <p>PRIVATE SPONSOR TRAVEL CERTIFICATION FORM (provide directly to each House invitee)</p> <p>This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers or employees under House Rule XXV, clause 5. A completed copy of the form (and any attachments) should be provided to each invited House Member, officer or employee, who will then forward it to the Committee. The trip sponsor should NOT submit the form directly to the Committee.</p> <p><i>Private sponsors are urged to submit this form to each House invitee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the invitee not receiving approval for the trip. The submission of an incomplete form will delay the review process. Before completing this form, sponsors are urged to carefully review the Committee's private travel guidelines and advisory memoranda detailing the rules and restrictions for private travel, as well as the instructions for completing this form. Sponsors should call the Committee with any questions prior to submitting the form. Please type form.</i></p> <p>1. Sponsor(s) (who will be paying for the trip): <u>CARIB NEWS FOUNDATION</u></p>

⁵ *Id.* at 09-2567 0003.

⁶ Memorandum of Interview of Representative Carolyn Kilpatrick (May 14, 2009) (Exhibit 2 at 09-2567 0034).

⁷ Private Sponsor Travel Certification Form signed by Karl Rodney (Oct. 3, 2008) (Exhibit 1 at 09-2567 0012).

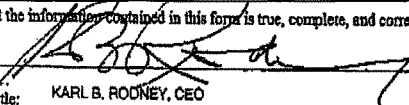
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21. Later, on that same form, Mr. Rodney represented that "the trip sponsor(s) [had] not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip."⁸

3. I represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip (signify "yes" by checking box):

22. Rodney also certified that the information was "true, complete, and correct."⁹

23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.
 Signature: 
 Name and title: KARL B. RODNEY, CEO

23. Prior to the conference, the Standards Committee approved reimbursement of Congresswoman Kilpatrick's expenses by the Carib News Foundation.¹⁰

U.S. House of Representatives
 COMMITTEE ON STANDARDS OF
 OFFICIAL CONDUCT
 Washington, DC 20515

October 21, 2008

The Honorable Carolyn C. Kilpatrick
 U.S. House of Representatives
 2264 Rayburn House Office Building
 Washington, DC 20515

Dear Colleague:

Pursuant to House Rule 25, clause 5(d)(2), the Committee on Standards of Official Conduct hereby approves your proposed trip for you and your sister to St. Maarten, N.A. scheduled for November 6 to 9, 2008 sponsored by the Carib News Foundation.

⁸ *Id.*

⁹ *Id.* at 09-2567 0014.

¹⁰ Letter from the Committee on Standards of Official Conduct to Representative Carolyn C. Kilpatrick (Oct. 21, 2008) (Exhibit 1 at 09-2567 0007).

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24. At the conference, several corporations, including Citibank, IBM, AT&T, and others, were identified as “sponsors.”¹¹
25. On November 7, 2008, the conference’s organizer, Karl Rodney, began the first morning program by thanking Citigroup, Pfizer, Macy’s, IBM, AT&T, the Verizon Foundation and American Airlines, as well as their executives in attendance at the conference by name.¹² This morning session was recorded by an individual attending the conference and the recording was subsequently transcribed. The OCE obtained a copy of the transcript. Mr. Rodney described AT&T as “support[ing] the Conference all 13 years” (this was the thirteenth annual conference).¹³
26. Michael Flanigan, an executive from Citibank, spoke immediately after Mr. Rodney and described Citibank as the “lead sponsor of the premier event.”¹⁴
27. Following Mr. Flanigan’s remarks, and the remarks of several other speakers, Representative Kilpatrick spoke. At the end of her remarks she stated, “[a]nd to the sponsors, by the way, all of you, we couldn’t do this, be with you, help Karl if you weren’t here with us so we say thank you very much, you are so important. To all of the sponsors, thank you very much.”¹⁵
28. In an interview with the OCE, Representative Kilpatrick confirmed that she spoke at this session and thanked corporate entities identified at the conference as “sponsors.”¹⁶

¹¹ Photographs taken at the 13th Annual Caribbean Multi-National Business Conference (Exhibit 5 at 09-2567 0068-0077) (The Board notes that the source of this information may have a bias, interest, or motive in this matter.).

¹² Transcript of Recording of November 7, 2008 AM Session of the 13th Annual Caribbean Multi-National Business Conference (Exhibit 3 at 09-2567 0036-37). (The Board notes that the source of this information may have a bias, interest, or motive in this matter.).

¹³ *Id.* at 09-2567 0036.

¹⁴ *Id.* at 09-2567 0038.

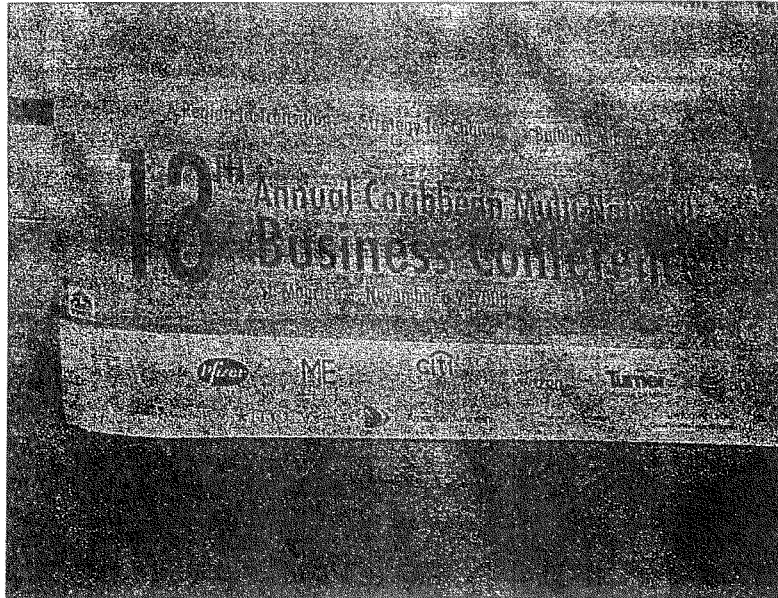
¹⁵ *Id.* at 09-2567 0053.

¹⁶ Memorandum of Interview of Representative Carolyn Kilpatrick (May 14, 2009) (Exhibit 2 at 09-2567 0032-0033).

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29. In addition to these comments, signs for the conference displayed these corporations' logos, including signs hung behind the speaker's podium where Representative Kilpatrick spoke.¹⁷



30. After she spoke but at the same morning session, Representative Kilpatrick participated in a "ribbon cutting" ceremony in which she and representatives from these corporations and the Leader of Government of St. Maarten, Commissioner Sarah Wescott-Williams, stood for photographs.¹⁸

¹⁷ Photographs taken at the 13th Annual Caribbean Multi-National Business Conference (Exhibit 5 at 09-2567 0069).

¹⁸ *Id.* at 09-2567 0070.

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31. In an interview with the OCE, Congresswoman Kilpatrick stated that she relied on the entity that invited her to the conference, the Carib News Foundation, to identify the sponsor of her trip and, further, that she relied on the Standards Committee, who pre-approved her trip, to determine if that information was accurate.¹⁹ As a result, Congresswoman Kilpatrick told the OCE that the involvement of these corporations in the conference did not raise questions in her mind about whether the Carib News Foundation was the sole sponsor of the conference.²⁰
32. The Board notes that the practice of relying entirely on the Standards Committee to determine the sponsor of a Member's travel carries with it a degree of risk. Further, while Members are required to receive pre-approval from the Standards Committee before they travel, it is the Member, and not the Standards Committee, that is ultimately accepting the travel from a private sponsor. The Board reads the pre-clearance process as

¹⁹ Memorandum of Interview of Representative Carolyn Kilpatrick (May 14, 2009) (Exhibit 2 at 09-2567 0034).

²⁰ *Id.* at 09-2567 0033.

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a free-standing requirement the House adopted in 2007. There is no indication that the House intended it to supplant, or certainly completely supplant, Members' responsibility to abide by the travel rules when they accept privately sponsored travel.⁶ As a result, it is the Board's view that a reasonable reading of the travel rules places responsibility for identifying the sponsor with both the Member and the Standards Committee and not the Standards Committee alone. This shared responsibility also reflects the practical reality that, because the Member actually takes the trip, and the Standards Committee does not, the Member may, in certain circumstances, have access to information about the trip not available to the Standards Committee. In this instance, the Members had information about the sponsors of the conference not available to the Standards Committee, namely that numerous corporations were identified as sponsors of the conference at the conference.

33. Further, as described below, these other entities were, in fact, sponsors of the conference.

B. CARIB NEWS also Sponsored Congresswoman Kilpatrick's Travel

34. Karl Rodney is the publisher of the CARIB NEWS, a weekly newspaper published in New York. He also identified himself as the CEO of the Carib News Foundation on the Private Sponsor Travel Certification described above.²¹

35. According to Mr. Rodney, "general funds" of CARIB NEWS were "pooled" with payments from corporate sponsors, made both to CARIB NEWS and the Carib News Foundation and fees from attendees at the conference to pay conference expenses including "travel" and "hotel payments."²²

36. Therefore, CARIB NEWS was also effectively a sponsor of Congresswoman Kilpatrick's trip.

C. Corporate Donations Were Earmarked for the Conference

37. According to the House Ethics Manual:

The rule and implementing regulations are concerned with the organization(s) or individual(s) that actually pay for travel. Thus, for example, when a nonprofit organization pays for travel with donations that were earmarked, either formally

²¹ Private Sponsor Travel Certification Form signed by Karl Rodney (Oct. 3, 2008) (Exhibit 1 at 09-2567 0012).

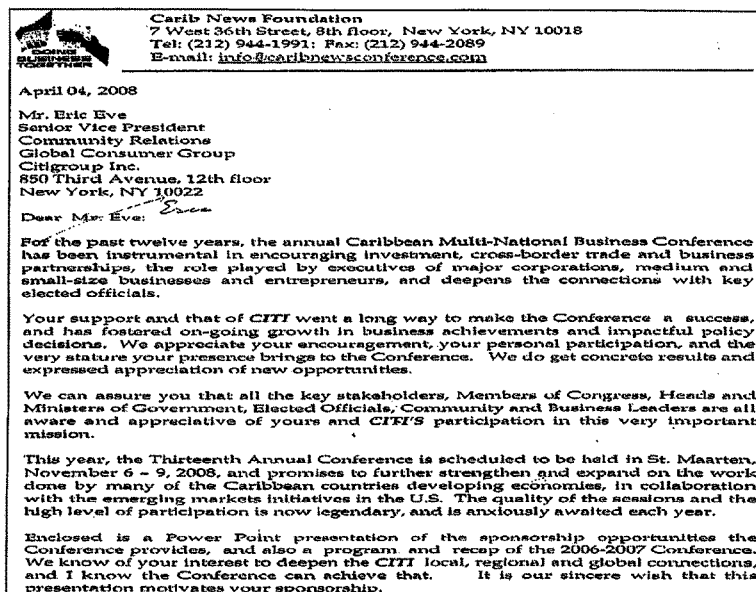
²² Letter from Joel Cohen, Counsel for Karl Rodney (May 18, 2009) (Exhibit 6 at 09-2567 0080).

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or informally, for the trip, each such donor is deemed a —private source for the trip and (1) must be publicly disclosed as a trip sponsor on the applicable travel forms and (2) must itself be required to satisfy the above standards on proper sources of travel expenses.

38. In the course of conducting its review, the OCE has learned that the Carib News Foundation solicited earmarked funds for the conference. For example, Carib News Foundation sent a solicitation letter to Citigroup, Inc.²³



39. Attached to this solicitation letter was a PowerPoint presentation.²⁴ The presentation solicits money only for the conference and not for any other purpose, outlining the benefits of each level of sponsorship – Platinum, Gold, and Silver, along with lesser

²³ Letter from Carib News Foundation to Mr. Eric Eve, Citigroup, Inc. (Apr. 4, 2008) (Exhibit 7 at 09-2567 0084-0085) (a nearly identical letter was sent to IBM, AT&T, Pfizer, Verizon Foundation and others).

²⁴ *Id.* at 09-2567 0086-0101.

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levels of sponsorship – in terms of the conference.²⁵ In each instance, the sponsorship covers travel related expenses such as gala events and meals.

PARTICIPATION

PLATINUM LEVEL - \$75,000

- ◆ Keynote Speaker at Main Event
- ◆ Sponsor Private VIP Reception and specially arranged forum
- ◆ Special Awards Presentation
- ◆ Display, Exhibition and signage
- ◆ Area of Conference - Reserved for exclusive sponsorship
- ◆ Full page Ad in program
- ◆ Air Transportation for 2 people
- ◆ Accommodations: One Suite and One Standard Room
- ◆ Included in all printed materials
- ◆ Included in Internet promotion
- ◆ Display company logo and link to our website
- ◆ Sponsor of a Gala Event
- ◆ Sponsor and Participate in a workshop
- ◆ Representative listed in program with bio and photo

²⁵ *Id.* at 09-2567 0094-0097.

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The OCE also learned that at least four of the corporations identified at the conference did in fact make payments to the Carib News Foundation and CARIB NEWS (the newspaper) earmarked for the conference. The Carib News Foundation itself appears to be nothing more than a conduit in this case, and a partial one at that, for payments from corporations to support the conference. There is no evidence that the organization has filed a tax return with the IRS, under either Carib News Foundation or Carib News Charities, since 2005.²⁶ On that form, the Carib News Foundation is shown as having no assets, no income and no expenses.²⁷ Not a single witness from a sponsor interviewed by the OCE knew of any other work of the Foundation. Indeed one witness, from IBM, was not aware that the Foundation played a role in the conference.²⁸

40. **Citigroup.** Citigroup made a \$75,000 payment to the CARIB NEWS for the conference.²⁹

41. **Verizon Foundation.** Verizon Foundation made a \$35,000 payment to the Carib News Charities³⁰ for the conference.³¹

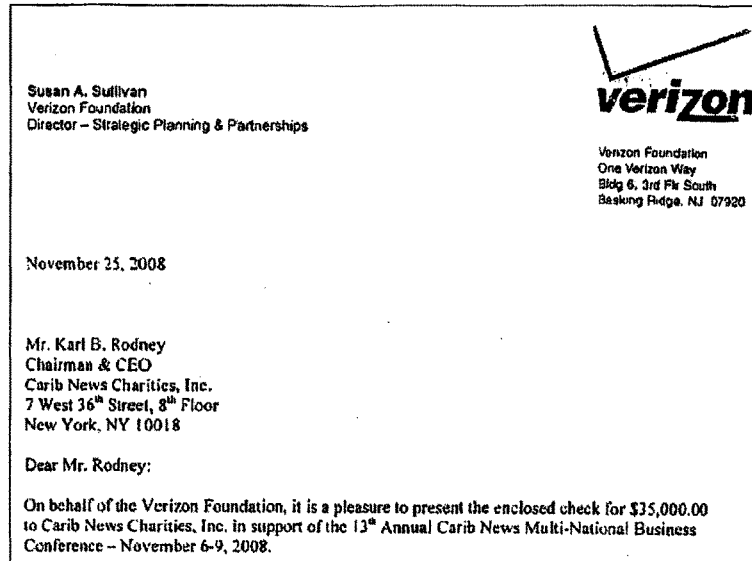
²⁶ Letter from IRS to OCE (April 17, 2009) (Exhibit 8 at 09-2567 0106-0118).

²⁷ *Id.* at 09-2567 0106-0108.

²⁸ Memorandum of Interview of Representative of IBM (May 8, 2009) (Exhibit 9 at 09-2567 0122).

²⁹ Documents submitted to the OCE by Citigroup (Exhibit 7 at 09-2567 0083).

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42. Representative 1 of the Verizon Foundation said the Verizon Foundation funded the Carib News Foundation for the first time in 2008 and that the grant was issued to provide funding for the 13th Annual Caribbean Multi-National Business Conference.³²
43. **IBM.** IBM made a \$20,000 payment to Carib News Foundation for the conference as indicated on the invoice that CARIB NEWS, INC. (not Carib News Foundation) sent IBM.³³

³⁰ Mr. Rodney accepted corporate payments under the names of three entities: The Carib News, the Carib News Foundation, and the Carib News Charities. According to the Secretary of State for the State of New York, the organization that currently operates as the Carib News Foundation originally operated under the name the Carib News Charities.

³¹ Documents Submitted to the OCE by the Verizon Foundation (Exhibit 10 at 09-2567 0127).

³² Memorandum of Interview of Representative 1 of Verizon Foundation (Mar. 23, 2009) (Exhibit 11 at 09-2567 0133).

³³ Documents submitted by IBM to the OCE (Exhibit 13 at 09-2567 0150).

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CARIB NEWS INC. 7 WEST 36TH STREET 8TH FLOOR NEW YORK, 10018 212-944-1991		Invoice					
		<table border="1"> <tr> <th>Date</th> <th>Invoice #</th> </tr> <tr> <td>7/16/2008</td> <td>45122</td> </tr> </table>	Date	Invoice #	7/16/2008	45122	
Date	Invoice #						
7/16/2008	45122						
<table border="1"> <tr> <th colspan="2">Bill To</th> </tr> <tr> <td colspan="2"> Wanda McKenzie IBM4 2607 Jesters Court Marietta, GA 30068 </td> </tr> </table>				Bill To		Wanda McKenzie IBM4 2607 Jesters Court Marietta, GA 30068	
Bill To							
Wanda McKenzie IBM4 2607 Jesters Court Marietta, GA 30068							
Description		Amount					
Sponsorship Multi-National Business Conference 2008 TAX ID 13-562860		20,000.00					

44. **Macy's.** Macy's made a \$35,000 payment to CARIB NEWS for the conference.³⁴

45. **Pfizer.** Pfizer made a \$25,000 payment to CARIB NEWS for the conference.³⁵

46. Only American Airlines explicitly limited their sponsorship of the conference to individuals who were not elected officials, prohibiting CARIB NEWS from using any part of their sponsorship on Members of Congress and other government officials and their staff.³⁶ No other sponsor with whom we spoke placed restrictions on how or on whom their contribution could be spent. The only expectation was that the contribution would be used for expenses associated with the conference.

D. Because Entities that Employ or Retain Lobbyists Sponsored the Event, Congresswoman Kilpatrick's Involvement Should Have Been Limited to One Day

³⁴ Memorandum of Interview of Representative 1 from Macy's (Exhibit 20 at 09-2567 0217).

³⁵ Interview with Investigative Counsel on May 22, 2009.

³⁶ Documents submitted by American Airlines to the OCE (Exhibit 14 at 09-2567 0151.2) and OCE Investigative Counsel interview with American Airlines Representative (Mar. 5, 2009) (American Airlines provided an in-kind contribution in the form of ten roundtrip tickets to be used by Carib News in any manner they chose with the exception that no ticket could be used for an elected official or the official's staff or family. The estimated value of their contribution was between \$6,200 and \$7,500).

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47. According to the House Ethics Manual:

***One-Day Event Trip.** The sole exception to the general prohibition on accepting officially-connected travel from a private source that retains or employs lobbyists or agents of a foreign principal is for trips involving attendance at or participation in one-day event (exclusive of travel time and an overnight stay).*

Under the rule, it is permissible for a Member or staff person to accept and meals related to a single night's lodging and meals related to the trip, if offered by the trip sponsor. Members and staff must limit their involvement in connection with the event to a single calendar day, exclusive of travel time and an overnight stay. A Member or staff person may therefore attend only a single day of a multiple-day conference, forum, or other event that is being hosted primarily for individuals other than congressional invitees.

Under the Committee's travel regulations and guidelines implementing the travel provisions of the gift rule, the Committee may permit a second night's stay when determined —on a case-by-case basis to be practically required to participate in the one-day event (House Rule 25, clause 5(b)(1)(C)). Some circumstances in which the Committee may permit a second night's stay are for certain long-distance trips, when a Member or staff person is participating in a full day's worth of officially-connected activities such that a second night's stay is necessary to accomplish the purpose of the trip, or other exceptional circumstances that are described in detail by the traveler. The traveler will be personally responsible for any expenses incurred beyond those allowed by the Committee in connection with the second night's stay.³⁷

48. Citigroup, IBM and Verizon employ or retain lobbyists.³⁸

49. Congresswoman Kilpatrick spent four days at the conference.³⁹

50. There is substantial reason to believe that Congresswoman Kilpatrick violated *House Rule 25, clause 5(b)(1)(C)* by accepting trip-related reimbursements from entities that employ or retain lobbyists for participating in an event for more than one day.

³⁷ House Ethics Manual (2008) at 92-93 (citing House Rule 25, clause 5(b)(1)(C) (emphasis in original)).

³⁸ Clerk of the House of Representatives Lobbying Disclosure Report 2008 (Exhibit 15 at 09-2567 0151.8).


³⁹ Member/Officer Post-Travel Disclosure Form signed by Representative Carolyn Cheeks Kilpatrick (Nov. 20, 2008) (Exhibit 1 at 09-2567 0002).

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E. The Government of St. Maarten Made In-Kind Donations to the 2008 Conference and Played a Significant Role in Planning, Organizing and Conducting the 2008 Conference

51. The Government of St. Maarten was the host of the 2008 conference and the Leader of Government of St. Maarten personally invited Representative Kilpatrick to attend.⁴⁰

 <h2 style="margin: 0;">Government of Sint Maarten</h2> <p style="margin: 0;">Sarah Wescot-Williams, M.Sc.</p>	
<p>Telephone: (599) 543-1166</p> <p>Fax: (599) 542-4292</p> <p>E-mail: coined@sintmaarten.net</p>	<p>St. Maarten, August 28, 2008</p> <p>Congresswoman Caroline Cheeks Kilpatrick U.S House of Representatives 1610 Longworth HOB Washington, DC 20515 Phone: 202-225-2261 Fax: 202-225-5730</p> <p style="text-align: right;">RECEIVED SEP 19 2008 Carol Cheeks Kilpatrick Congressional Office</p>
<p>Honorable Congresswoman Kilpatrick,</p> <p>The well-known Carib News Foundation has once more chosen our island, St. Maarten, as venue for its 13th Annual Caribbean Multi-National Business Conference scheduled to be held from November 6 – 9, 2008 at the Sonesta Maho Beach Resort & Casino. The conference is being held under the theme: "A Region in Transition – Strategy for Change, Alliance for Progress".</p> <p>We are thrilled to host this very important and prestigious conference and it is my distinct pleasure, on behalf of the government and people of St. Maarten, to invite you personally to be part of this gathering which we hope would, as its theme suggests, map out a strategy for change and a reinvigorated alliance for progress during this period of obvious transition in U.S.–Caribbean relations.</p>	

52. In that capacity, the Government of St. Maarten provided in-kind donations to support the conference and also had a substantial role in planning the conference. As a result, it was effectively a sponsor of the 2008 conference.⁴¹

⁴⁰ Letter from Leader of Government of St. Maarten, Commissioner Sarah Wescot-Williams, to Representative Carolyn Cheeks Kilpatrick (Aug. 28, 2008) (Exhibit 1 at 09-2567 0009).

⁴¹ In 2007, the "host" of the conference was the Government of Antigua and Barbuda. In the event that the Government of Antigua and Barbuda provided the same support as St. Maarten did in 2008, then the members may

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53. Rodney provided the Leader of Government of St. Maarten, Commissioner Wescott-Williams, with a list of "Basic Requirements to Host Caribbean Multi-Business Conference."⁴² These included:

- To provide the care and comfort for the VIP's attending La.
 - To provide 25 all-inclusive rooms for the VIP's and members of Congress attending;
 - To provide appropriate mode of transportation for VIP's and members of Congress - cars or specialized vans - not buses;
- To be a designated sponsor in one of the categories: *Title, Main or Regular Sponsor* (See Attachment)
- To organize a "Host Country Evening". The Friday evening, the host country will host at an appropriate location an evening of food, refreshment, cultural presentation and entertainment.
- Provide for local entertainment for the various functions --
 - The Opening Ceremonies
 - The Reception
 - The Gala Dinner
- To assist in Promotion and Publicity of the conference both locally and through international offices and official publications.
- Assist in securing competitive hotel rates.
- Equip and staff conference secretariat.
- Prime Minister to issue invitations along with CARIB NEWS to members of the US Congress, other Prime Ministers and Ministers of Government
- Participate in the Forum with Members of Congress.
- Arrange tours and activities of interest for VIP's and/or their spouse.

54. According to a statement from Mr. Rodney submitted to the OCE, the Government of St. Maarten, (1) developed local Host Committees to facilitate local planning; (2) helped

have accepted gifts from a foreign government which would have been reportable under the Foreign Gift and Decorations Act. In addition, if the Government of Antigua provided these gifts to the Members, and if they were more than \$335 in value, then the Members should have disclosed them on their financial disclosure form for 2007, which was filed in May 2008.

⁴² Letter from Karl Rodney to Commissioner Sarah Wescott-Williams (Aug. 13, 2008) (Exhibit 16 at 09-2567 0151.15).

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negotiate the rate with the hotel, (3) assisted in developing the then (4) assisted in identifying local speakers, including the Leader of G assisted in local publicity, (6) provided local entertainment, includi cultural items, (7) arranged Host Country Evening on Friday, Nov group was transported to another property for refreshments and en with local transportation for some CARIB NEWS employees and helped arrange accommodations for some guests (not paying for such accommodations), (9) participated as event speakers, and (10) issued invitations to attend to specially invited guests."⁴³ These contributions to the conference were all in-kind, according to Mr. Rodney, and he did not provide an estimated value for them.⁴⁴

55. In addition, because these donations to the conference are from a foreign government, Members are required to take certain actions under the Foreign Gifts and Decorations Act.⁴⁵

56. Representative Kilpatrick told the OCE that she was unaware of what role the Government of St. Maarten played in the conference.⁴⁶

III. Role of the Chair's Counsel in the Approval of the 12th Annual Caribbean Multi-National Business Conference in 2007

57. As previously stated, Congresswoman Kilpatrick told the OCE that she relied on the Standards Committee to determine who the true sponsor of the conference was based on information the Standards Committee received from the organization that invited her to the conference—the Carib News Foundation.⁴⁷ In the course of the Board's review, the OCE requested documents from Mr. Karl Rodney, the CEO of the Carib News Foundation. Mr Rodney voluntarily submitted documents to the OCE that included, among other things, communication with certain members of the staff of the Committee on Standards of Official Conduct in 2007. The contents of these documents from 2007 are relevant because they indicate the role of the corporations was concealed from the Committee in 2008.

58. The Board requested that the Committee provide the information submitted to it for 2008 and the Committee declined to do so.

⁴³ Letter from Joel Cohen, Counsel for Karl Rodney (May 18, 2009) (Exhibit 6 at 09-2567 0079-0080).

⁴⁴ *Id.*

⁴⁵ 5 U.S.C. § 7342.

⁴⁶ Memorandum of Interview of Representative Carolyn Kilpatrick (May 14, 2009) (Exhibit 2 at 09-2567 0033).

⁴⁷ *Id.* at 09-2567 0034.

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59. The documents submitted by Mr. Rodney show that in 2007 the CARIB NEWS initially identified, on several occasions, other corporations as sponsors of the Conference. The designation of these corporate entities as sponsors presented a problem for CARIB NEWS and the Members who wished to attend the conference insofar as their attendance would be limited to one day. In 2007, as a result of changes in the travel rules, a Member could not, in most instances, participate in an event (such as a conference) for more than one day if their travel to and participation in the event was paid for by an entity that employed or retained a lobbyist.⁴⁸ Many of the corporate entities who sponsored the 2007, as well as the 2008 conference, employed or retained lobbyists. Although CARIB NEWS initially identified these entities as sponsors, following interactions with the counsel to the then-chair of the Committee, apparently without the knowledge of the Standards Committee staff attorney assigned to review the trip, the documents identifying these organizations as sponsors were changed.
60. Subsequently, in 2008, the Carib News Foundation submitted documents that omitted the role of these other corporations as sponsors of the conference. Further, the staff attorney assigned to review the trip in 2008 was not the same staff attorney that reviewed the trip in 2007.
61. The earliest communication between CARIB NEWS or the Carib News Foundation and anyone associated with the Ethics Committee in the documents submitted to the OCE from Mr. Rodney is an e-mail dated September 17, 2007 from Patricia Louis, an Executive Assistant at CARIB NEWS, to Dawn Kelly Mobley, Counsel to the then-Chair of the Ethics Committee.⁴⁹
62. The next day, on September 18, 2007, Ms. Mobley responded and asked for "any information on your sponsor's status."⁵⁰
63. That same day Ms. Louis responded, indentifying multiple corporations as "sponsors" of the trip.⁵¹

⁴⁸ House Ethics Manual (2008) at 92-93 (citing House Rule 25, clause 5(b)(1)(C)).

⁴⁹ E-mail from Patricia Louis to Dawn Kelly Mobley (Sept. 17, 2007, 3:47 PM EST) (Exhibit 17 at 09-2567 0174) (The Board elected not to interview Ms. Mobley and Ms. Olson because the Standards Committee voted against disclosing information to the OCE. The Board determined that it would have been an act of bad faith on the part of the OCE to attempt to interview staff and former staff of the Standards Committee in light of the Committee's refusal to grant OCE access to their records.).

⁵⁰ E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 18, 2007, 12:57 PM EST) (Exhibit 17 at 09-2567 0174).

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**We had received the forms from Shelley.
The sponsors to date are : MACYS, PFIZER, AMERICAN AIRLINES, GOLDEN KRUST
BAKERY, CARIBBEAN FOOD DELIGHTS, PREFERRED HEALTH PARTNERS, IBM,
AT&T/CINGULAR**

Regards

**Patricia Louis
Executive Assistant
CARIB NEWS
7 West 36th Street, 8th Floor
New York, NY 10018**

64. In response that same day, Ms. Mobley asked, “[d]o any of these organizations have or retain a lobbyist?”⁵²
65. The next day, Ms. Mobley further responded asking Ms. Louis whether she, Ms. Mobley, should “assume” the sponsor was CARIB NEWS, despite the fact that Ms. Louis had not identified CARIB NEWS as a sponsor.⁵³ The Board notes that in her e-mail, Ms. Louis did not identify CARIB NEWS as a sponsor. Further, Ms. Mobley acknowledged that she had been told corporations identified by Ms. Louis were “sponsoring food and other parts of the Antigua travel.” Under House rules in place at the time, and under current rules, sponsoring a meal makes these corporations sponsors of a Member’s travel.⁵⁴ The Board also notes Ms. Mobley’s use of the phrase “safe review,” which the Board takes to mean a review which results in approval of the trip.

⁵¹ E-mail from Patricia Louis to Dawn Kelly Mobley (Sept. 18, 2007) (Exhibit 17 at 09-2567 0190) (The Board notes that while the document that contains the e-mail does not have a header which indicates a date and time, both the e-mail before it and responding to it are dated September 18, 2007).

⁵² E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 18, 2007, 7:03 PM EST) (Exhibit 17 at 09-2567 0189).

⁵³ E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 19, 2007, 2:16 PM EST) (Exhibit 17 at 09-2567 0189).

⁵⁴ House Ethics Manual (2008) at 97-98.

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From: Kelly Mobley, Dawn
 Sent: Wednesday, September 19, 2007 2:16 PM
 To: 'plouis'
 Subject: RE: Draft Program - 2007 Business Conference (No agenda or program attached)

Patricia:

I understand that several organizations will take part in sponsoring food and other parts of the Antigua travel. However, I need clarification on the *official* sponsor; that organization providing travel, lodging, and organizing the trip? Am I to assume it is CARIB NEWS? The official sponsoring organization must not retain or employ a registered lobbyist or registered foreign agent (and the sponsor must have a direct and immediate relationship with the event or location being visited). To assist with this, I am scanning information/guidelines and emailing in just a moment. Please provide a fax number if that method of submital will be more helpful. If there is someone handling this matter, please provide me their direct contact information as I must ensure adherence to these new guidelines pre-travel.

In any event, I do need to know who the official sponsor will be. I have assigned a staff attorney to review your documents and will remain in contact with you until this matter is finalized.

Please respond today or tomorrow at the latest. I will be traveling for a while thereafter and must ensure that my staff attorney has all that is necessary for a safe review.

Dawn Kelly Mobley
 Ethics Counsel for Congresswoman Stephanie Tubbs Jones
 Chairwoman, Committee on Standards of Official Conduct
 U.S. of Representatives
 Washington, DC 20518
 202/226-7103

66. Later in the afternoon on September 19, 2007, Ms. Mobley sent Ms. Louis another e-mail where she discussed the limitations posed by the new travel rules the House had adopted in 2007. Ms. Mobley told Ms. Louis, "the new rules might prohibit some things you were able to do with so many different sponsors in the past." Thus, Ms. Mobley again acknowledged that these corporations were sponsors and that the new travel rules affected the nature of their participation in the trip.⁵⁵

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
 Sent: Wednesday, September 19, 2007 3:23 PM
 To: plouis
 Subject: RE: Draft Program - 2007 Business Conference (No agenda or program attached)

Lastly, just send the sponsor form asap for review. The new rules might prohibit some things you were able to do with so many different sponsors in the past, but until we get the form, we can't make the most informed decision. I have let the Congresswomen know we are awaiting your sponsor form. Just as you do, they would also like assurance. Thank you.

67. On September 21, 2007, Ms. Louis responded.⁵⁶

⁵⁵ E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 19, 2007, 3:23 PM EST) (Exhibit 17 at 09-2567 0189).

⁵⁶ E-mail from Patricia Louis to Dawn Kelly Mobley (Sept. 21, 2007, 1:56 PM EST) (Exhibit 17 at 09-2567 0187).

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Registration

From: piouls [piouls@nycaribnews.com]
Sent: Friday, September 21, 2007 1:56 PM
To: 'Dawn.KellyMobley@mail.house.gov'
Subject: Re Sponsorship Information

The official sponsor of the conference is the CARIB NEWS FOUNDATION, a not-for-profit 501(C)3 organization that provides educational information about the Caribbean Region and its relationship with the US in doing business and developing good neighborly ties with the United States, security, health, education etc.

The CARIB NEWS FOUNDATION does not retain or employ a registered lobbyist or registered foreign agent.

Please use me as your contact for the purposes of this Conference.

The form will be emailed to you this afternoon.

Regards

Patricia Lewis

Executive Assistant
CARIB NEWS
7 West 38th Street, 8th Floor
New York, NY 10018

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68. That same day, on September 21, 2007, Ms. Louis faxed Ms. Mobley a Private Sponsor Travel Certification Form. On the form Carib News Foundation is listed as the sponsor of the trip in question 1.⁵⁷

<p>U.S. House of Representatives Committee on Standards of Official Conduct</p> <p>PRIVATE SPONSOR TRAVEL CERTIFICATION FORM (provide directly to each House invitee)</p> <p><i>This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers or employees under House Rule XXV, clause 5. A completed copy of the form (and any attachments) should be provided to each invited House Member, officer or employee, who will then forward it to the Committee. The trip sponsor should NOT submit the form directly to the Committee.</i></p> <p><i>Private sponsors are urged to submit this form to each House invitee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the invitee not receiving approval for the trip. The submission of an incomplete form will delay the review process. Before completing this form, sponsors are urged to carefully review the Committee's private travel guidelines and advisory memoranda detailing the rules and restrictions for private travel, as well as the instructions for completing this form. Sponsors should call the Committee with any questions prior to submitting the form. Please type form.</i></p> <p style="text-align: center;">Carib News Foundation</p> <p>1. Sponsor(s) (who will be paying for the trip): _____</p>
--

69. However, the Carib News Foundation listed a number of corporations as private sponsors, each with responsibility for planning and conducting the trip, in question 12.⁵⁸ This is at least the second instance where the Carib News Foundation identified these corporations as the trip's sponsors.

<p>12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip: Pfizer Education/Health AT&T and IBM; provide technology to the region. MACYS - seeks new vendor sources, Citibank opportunities in the region.</p>
--

70. This prompted the following e-mail from Ms. Mobley to Ms. Louis.⁵⁹ The Board notes that Ms. Mobley stated she was "working through" the Carib News Foundation's forms "before leaving them with our staff attorney."

⁵⁷ Private Sponsor Travel Certification Form (Sept. 21, 2007) (Exhibit 17 at 09-2567 0177).

⁵⁸ *Id.* at 09-2567 0178.

⁵⁹ E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 25, 2007, 12:42 PM EST) (Exhibit 17 at 09-2567 0174).

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From: Kelly Mobley, Dawn
 Sent: Tuesday, September 25, 2007, 12:42 PM
 To: 'Louis';
 Subject: Query

I am working through your forms before leaving them with our staff attorney and have a question. Query: Why did you not list CARIB NEWS as the sponsor as you indicated instead of Macy's, etc. The official sponsor for travel, lodging, and planning is still Carib News, correct?

71. Later that same day, Ms. Mobley queried further.⁶⁰ At least as of this date, following at least two instances where Ms. Louis identified these corporations as sponsors, Ms. Mobley appeared to treat these entities as "co-sponsors."

From: Kelly Mobley, Dawn
 Sent: Monday, October 01, 2007 5:08 PM
 To: Kelly Mobley, Dawn
 Subject: RE: Query

We are trying to work through a problem in approving the co-sponsors piece. Are they each paying for a one-day, widely attended event or more days? Please read the Gift Rules forwarded you on this matter.

72. On October 3, 2007, Ms. Mobley informed Ms. Louis that Susan Olson was the staff attorney assigned to review the trip.⁶¹
73. A copy of the Private Sponsor Travel Certification Form provided to a Member's office on October 5, 2007, shows that by October 5, 2007, following its interaction with Ms. Mobley, Carib News Foundation changed its answer to question 12 regarding other private sponsors. As previously highlighted, as of September 21, 2007, Carib News Foundation provided the following answer to question 12.⁶²

12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip. Filter Education/Health AT&T and IBM - provide technology to the region. MACYS - seeks new vendor sources, Citibank opportunities in the region.

74. However, as of October 5, 2007, it provided a different answer to question 12.⁶³

⁶⁰ E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 25, 2007, 5:08 PM EST) (Exhibit 17 at 09-2567 0174).

⁶¹ E-mail from Dawn Kelly Mobley to Patricia Louis (Oct. 3, 2007, 12:39 PM EST) (Exhibit 17 at 09-2567 0171).

⁶² Private Sponsor Travel Certification Form (Sept. 21, 2007) (Exhibit 17 at 09-2567 0177).

⁶³ Private Sponsor Travel Certification Form (Oct. 5, 2007) (Exhibit 18 at 09-2567 0192).

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<p>12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip:</p> <p>CARIB NEWS FOUNDATION (SEE ATTACHED SHEET)</p>
--

And the attached sheet provided the following information.⁶⁴

<p>Item #12</p> <p>CARIB NEWS FOUNDATION is organized to provide education and information about the Caribbean in the area of Business, Education, Health and Culture, Promote Good neighborly within the United States and the hemisphere.</p>

On October 10, 2007, Susan Olson, the staff attorney on the Standards Committee assigned to review the trip e-mailed Ms. Louis the following questions⁶⁵ (and copied Ms. Mobley and the Chief Counsel of the Standards Committee at that time, Bill O'Reilly). While the Private Sponsor Travel Certification Form for the trip had been changed by this date, the draft agenda for the conference apparently had not and still showed corporate sponsors for various events. What Ms. Olson does not appear to be aware of is the fact that Carib News Foundation had previously identified the same corporations she is raising questions about as private sponsors on its original Private Sponsor Travel Certification form.

<p>Original Message</p> <p>From: Olson, Susan [mailto:susan_olson@mail.house.gov]</p> <p>Sent: Wednesday, October 10, 2007 4:01 PM</p> <p>To: plouis@caribnews.com</p> <p>Cc: Dawn Kelly Mobley@mail.house.gov; O'Reilly, Bill</p> <p>Subject: Carib News - Pre-trip Approval Issues</p> <p>Dear Mrs. Louis:</p> <p>With regard to the pre-trip approval requests for the Carib News Foundation's</p>

⁶⁴ *Id.* at 09-2567 0197.

⁶⁵ E-mail from Susan Olson to Patricia Louis (Oct. 10, 2007, 4:01 PM EST) (Exhibit 17 at 09-2567 0159-0160).

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(Foundation) trip to Antigua, the issues involving sponsorship are as follows:

While the sponsor form that you completed indicates that the Foundation is the sole sponsor of the 2007 trip, the draft schedule, however, indicates that the following entities are sponsoring sessions, events, etc. during this trip:

- Antigua Government
- Sandals
- Royal Caribbean Bakery
- Citi
- Pfizer
- Macy's
- AT&T
- HEB
- IBM
- Goodworks International
- Preferred Health Partners
- Antigua & Barbuda
- American Airlines
- Golden Krust

Last year the Foundation provided the following information regarding these "additional sponsors" for the November 8 to 12, 2006 trip:

The Foundation, which is a 501(c)(3) nonprofit organization, will be paying for the Members' travel expense including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a "contribution to the overall pool of expenses in contribution to the Foundation" which is used to "underwrite the overall expenses of the Conference," primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organization who will be attending and participating in the Conference.

Accordingly, the Committee's Advisory Opinion, dated October 27, 2006, provided that all of the organizations that provided financial underwriting for the trip along with the Foundation were required to be listed as the "trip sponsors" on the participating Members' post-travel disclosure form and their 2006 annual financial disclosure statements.

Accordingly, you need to provide information describing the role of these "additional sponsors" as listed in the 2007 trip draft schedule for this current trip. Without such information, I cannot proceed with the review of the pre-trip approval requests for the Foundation's Antigua trip.

Susan L. Olson

Counsel

House Committee on Standards of Official Conduct

75. The Committee's Advisory Opinion dated October 27, 2006 indicates, as Ms. Olson wrote, that Carib News Foundation told the Standards Committee in 2006 that there were several corporate entities that sponsored the conference.⁶⁶ The "Advisory Opinion" did not conclude that these entities were, in fact, the trip's sponsors, as the e-mail seems to indicate.

⁶⁶ Committee on Standards of Official Conduct, Advisory Opinion (Oct. 27, 2006) (Exhibit 17 at 09-2567 0183-0185).

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76. A draft agenda for the conference dated October 3, 2007, identified a “sponsor” for each event listed.⁶⁷ This appears to be the version of the agenda that Olson is referring to in her e-mail. For example, “Preferred Health Partners” is identified as the sponsor of this event on “Port & Airport Security—The Mandates.”⁶⁸

PORT & AIRPORT SECURITY - THE MANDATES	
Moderator	Lance Oglet Hon. Bennie Thompson
Dr. Basil Wilson	
Venue	
Sponsor - Preferred Health Partners	

And Citi is identified as the sponsor of this event on “Community Outreach – Education – Access and Collaboration.”⁶⁹

4:00pm - 5:30pm	COMMUNITY OUTREACH - EDUCATION - ACCESS AND COLLABORATION
Venue:	Off Site
Sponsor	CITI
Moderator:	Michael Flanigan
Speakers:	Dr. Edison Jackson - President Medgar Evers College Hon. Danny Davis - Member of Congress Hon. David M. Dinkins - Former Mayor New York City Hon. Eddie Bernice Johnson - Member of Congress Hon. Bertrand Joseph

⁶⁷ Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 3, 2007) (Exhibit 19 at 09-2567 0198-0215).

⁶⁸ *Id.* at 09-2567 0204-0205.

⁶⁹ *Id.* at 09-2567 0211.

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77. Ms. Louis forwarded Ms. Olson's e-mail to Ms. Mobley, Congressman Charles Rangel's Chief of Staff George Dalley and Delegate Donna Christensen's scheduler Shelley Thomas, and asked them to advise her on a response.⁷⁰

-----Original Message-----
 From: plouis@mycarlinews.com
 To: Kelly Mobley, Dawn Thomas, Shelley Dalley, George
 Sent: Wed Oct 10 17:56:25 2007
 Subject: FW: Carib News - Pre-trip Approval Issues

Please see e-mail I received from Ms. Olson of the Committee on Standards of Official Conduct:

A possible response could be: The sponsors contribute to the overall expense of the trip and the general work of the Foundation. As a courtesy, each contributor is given an opportunity to be attached to a part of the program that is being presented. They do not determine the content or the other participants in the Conference.

Please advise us.

Regards and Thanks

Ms. Louis appears to be pre-clearing her response to questions posed by the Standards Committee staff attorney. There is no indication that the staff attorney knew that the answer to her question had already been discussed with the counsel to the then-chair of the Standards Committee. Substantively, based on documents obtained by the OCE and interviews with sponsors, the statement "the sponsors contribute to the overall expense of the trip" appears to be true. However, the statement "and the general work of the Foundation," does not appear to be true. All of the sponsors OCE interviewed stated unequivocally that the contribution was intended for the conference.⁷¹

⁷⁰ E-mail from Patricia Louis to Dawn Kelly Mobley, George Dalley, and Shelley Thomas (Oct. 10, 2007, 5:56 PM EST) (Exhibit 17 at 09-2567 0163).

⁷¹ Memorandum of Interview of Representative of IBM (May 8, 2009) (Exhibit 9); Memorandum of Interview of Representative 1 of the Verizon Foundation (Mar. 23, 2009) (Exhibit 11); Memorandum of Interview of Representative of Citi (Mar. 17, 2009) (Exhibit 4); Memorandum of Interview of Representative 1 from Macy's (Exhibit 20).

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78. Less than an hour later Ms. Mobley responded.⁷² The Board notes Ms. Mobley's concern with whether any of the corporate sponsors paid for an event and also retained a lobbyist⁷³ and her conclusion that if they did, Members of Congress could only attend for one day.

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
 Sent: Wednesday, October 10, 2007 6:49 PM
 To: plouis@nycafbnews.com
 Subject: Re: Carib News - Pre-trip Approval Issues

Her question centers on whether any of these co-sponsors retains a lobbyist or foreign. This is the issue you and I focused on previously. It's a neutral problem if any do and are paying for the events. If so, you are in the same position as last year with one-day events. Call Susan back tomorrow as early as possible. Hopefully, these co-sponsors don't retain lobbyists, but you should have their representations on this matter. At a minimum, Nancy's does, right? Alternatively, if they are only sponsoring event tables or the like, a lobbyist will not be problematic.

Sent using BlackBerry


79. Ms. Louis then faxed Ms. Mobley.⁷³ The Board notes that Ms. Louis again appears to be pre-clearing her responses to the staff attorney, Ms. Olson, with Ms. Mobley ("Kindly review and advise before I send to Ms. Olson.").

⁷² E-mail from Dawn Kelly Mobley to Patricia Louis (Oct. 10, 2007, 6:49 PM EST) (Exhibit 17 at 09-2567 0165).

⁷³ Fax from Patricia Louis to Dawn Kelly Mobley (Oct. 11, 2007) (Exhibit 17 at 09-2567 0162).

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 THE NEW YORK CARIB NEWS <small>THE WEEKLY VOICE OF THE CARIBBEAN-AMERICAN COMMUNITY 7 West 48th Street #17206, New York, NY 10019</small>	
TEL: (212) 944-1991 FAX: (212) 944-2089 E-MAIL ADDRESS: NYCARIB@AOL.COM CARIBNEWS@ATT.NET	
FACSIMILE TRANSMITTAL SHEET	
TO: Dawn Kelly Mobley	FROM: P. Louis <i>[Signature]</i>
COMPANY: Ethics Counsel for Cong. Stephanie Tubbs Jones	DATE: 10/11/07
FAX NUMBER: 202-225-7392	TOTAL NO. OF PAGES INCLUDING COVER:
RE: Travel Form	
<input type="checkbox"/> URGENT <input type="checkbox"/> FOR REVIEW <input type="checkbox"/> PLEASE COMMENT <input type="checkbox"/> PLEASE REPLY <input type="checkbox"/> YOUR INFORMATION	
<p>Further to our conversations of this morning, following is the Travel Certification Form.</p> <p>The Conference is paid for by the Carib News Foundation. The companies are participants, are not sponsors or co-sponsors for any part of the trip and play no role in the planning or content.</p> <p>The program has been amended to reflect the companies as Participants.</p> <p>I regret the mis-understanding and thank you for holding my hand as I go through and grow through this process which is new to me.</p> <p>Kindly review and advise before I send to Ms. Olsen.</p> <p>I look forward to hearing from you.</p>	

80. The Board further notes that Ms. Louis represented that, "the program has been amended to reflect the companies as Participants," an action taken following Ms. Louis' interactions with Ms. Mobley. A copy of the revised agenda was submitted by another

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Member of Congress who attended the conference.⁷⁴ The Board notes that this "updated" schedule changed the label applied to "sponsors" to "participants" and in some cases deleted any mention of the corporate entity that had previously been identified as a "sponsor."

18/24/2007 19:08 2129442889	<i>Updated Schedule for Carib Nov 15</i> PAGE 83
WORKING DRAFT 10/22	
12th Annual Caribbean Multi-National Business Conference Program Antigua & Barbuda	

81. This event was previously identified in the earlier draft as being "sponsored" by Preferred Health Partners.⁷⁵ Now it identifies them as merely a "participant."⁷⁶

<u>PORT & AIRPORT SECURITY - THE MANDATES</u>	
Moderator	Mr. Lance Ogiste
	Hon. Bennie Thompson
	Hon. Dwer Astephan
Venue	Sardula Granda
Participant	Preferred Health Partners

⁷⁴ Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 22, 2007) (Exhibit 21 at 09-2567 0221-0232).

⁷⁵ Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 3, 2007) (Exhibit 19 at 09-2567 0204-0205).

⁷⁶ Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 22, 2007) (Exhibit 20 at 09-2567 0225).

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82. In another example, the Board notes that the following event was previously identified as being sponsored by CITI.⁷⁷ Now CITI is not even mentioned.⁷⁸ Michael Flanigan, the moderator, was an executive at CITI at the time and represented the company at the conference.⁷⁹

5:00pm - 6:30pm	-	COMMUNITY OUTREACH - <u>EDUCATION & YOUTH DIRECTION - ACCESS AND COLLABORATION</u>
Venue:	-	Multipurpose Cultural & Exhibition Centre
Moderator:	-	Michael Flanigan
Speakers:	-	Dr. Edison Jackson - President Medgar Evers College Hon. David M. Dinkins - Former Mayor New York City Hon. Eddie Bernice Johnson - Member of Congress Hon. Bertrand Joseph

83. These changes were entirely cosmetic. There is no indication that the corporations' substantive role in the conference changed in any way.

⁷⁷ Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 3, 2007) (Exhibit 19 at 09-2567 0211).

⁷⁸ Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 22, 2007) (Exhibit 21 at 09-2567 0231).

⁷⁹ Memorandum of Interview of Representative of Citi (Mar. 17, 2009) (Exhibit 4).

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84. That same day, October 11, 2007, Ms. Louis responded to Ms. Olson, stating that “[t]he sponsors contribute to the overall expense of the trip.”⁸⁰ The Board notes that this is precisely the answer she had pre-cleared with Mobley.

From: plouis [mailto:plouis@nycaribnews.com]
 Sent: Thursday, October 11, 2007 10:33 AM
 To: Olson, Susan
 Subject: RE: Carib News - Pre-trip Approval Issues

Ms. Olson,
 In response to your e-mail:
 The sponsors contribute to the overall expense of the trip and the general work of
 the Foundation.
 As a courtesy, each contributor is given an opportunity to be attached to a part of
 the program
 that is being presented. They do not determine the content or the other participants
 in the
 Conference.

No federally registered lobbyist or foreign agent will be accompanying the Members
 of
 participating in the program.

Regards

 Patricia Louis
 Executive Assistant
 CARIB NEWS
 7 West 36th Street, 8th Floor
 New York, NY 10018

85. Ms. Olson then forwarded her exchange with Ms. Louis to Bill O’Reilly, the Staff Director and Chief Counsel of the Ethics Committee at that time, and to Dawn Mobley.⁸¹ Based on this e-mail, it appears that Ms. Olson was unaware that Mobley had been communicating directly with the Carib News Foundation. There is also no evidence that Ms. Mobley told her she had been involved in this manner. Witnesses for the various sponsors told the OCE that they did contribute funding directly to the trip (the conference) and in no case did they simply make donations to the “general funds” of the CARIB NEWS or the Carib News Foundation.⁸²

⁸⁰ E-mail from Patricia Louis to Susan Olson (Oct. 10, 2007, 10:33 AM EST) (Exhibit 17 at 09-2567 0159).

⁸¹ E-mail from Susan Olson to Bill O’Reilly and Dawn Kelly Mobley (Oct. 12, 2007 9:29 AM) (Exhibit 17 at 09-2567 0158-0159).

⁸² Memorandum of Interview of Representative of IBM (May 8, 2009) (Exhibit 9); Memorandum of Interview of Representative 1 of the Verizon Foundation (Mar. 23, 2009) (Exhibit 11); Memorandum of Interview of Representative of Citi (Mar. 17, 2009) (Exhibit 4); Memorandum of Interview of Representative 1 from Macy’s (Exhibit 20).

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From: Olson, Susan
 Sent: Friday, October 12, 2007 9:58 AM
 To: O'Reilly, Bill; Kelly Mobley, Dawn
 Subject: FW: Carib News - Pre-trip Approval Issues

Bill and Dawn,
 Please note the following response from Ms. Louis at Carib News: Unfortunately, it appears that if each sponsor contributes funding directly to the trip (an earmark of funds) and not simply to the general funds of Carib News, then the assumption is that all of these entities are co-sponsors of the trip for purposes of the House travel rules. If that is the case and since it is likely that at least one of these co-sponsors hires or retains a federally registered lobbyist, the trip could only be a one-day event trip. Thus the Committee can't approve the trip as it currently exists.

But, if you have a different interpretation of the below information from Ms. Louis, please do let me know. Thanks! Susan

86. Ms. Mobley then forwarded Ms. Olson's internal e-mail to Ms. Louis.⁸³ The Board notes that Ms. Mobley counseled that these "other organizations" can "participate" in the program but "should not help pay for the trip."

From: Kelly Mobley, Dawn
 Sent: Friday, October 12, 2007 9:59 AM
 To: Louis
 Subject: FW: Confidential

Please read both emails below. Give Susan a call as soon as you work through the kink, let her know you are following up. Please make yourself available to work through this matter today. Thank you Patricia. (These other organizations can participate in the program but should not help pay for the trip).

87. Later that day, Ms. Mobley sent Ms. Louis an additional e-mail.⁸⁴ As previously stated, the sponsors whom the OCE interviewed all stated that they did not "support [the] foundation annually" and did specifically designate their donations for the 2007 conference. Either Ms. Mobley was repeating inaccurate information Ms. Louis had given her, or she was giving inaccurate information to Ms. Olson without prompting.

⁸³ E-mail from Dawn Kelly Mobley to Patricia Louis (Oct. 12, 2007 9:59 AM EST) (Exhibit 17 at 09-2567 0158).

⁸⁴ E-mail from Dawn Kelly Mobley to Patricia Louis (Oct. 12, 2007 1:55 PM EST) (Exhibit 17 at 09-2567 0158).

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Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Friday, October 12, 2007 1:36 PM
To: plouis
Subject: RE: Confidential

The fax did not come through. I will be stepping out of the office for the remainder of the day, but will be in early Monday. Please follow up again with Susan. I have explained that the organizations you labeled as co-sponsors are not. They support your foundation annually, but have not and will not pay for the Members trip. This is simply a misunderstanding of the terms "sponsor", "contributor", and "participant" as used in the Ethics rules which is why I sent you the Rules book for preparation.

Once you are able to clarify these issues and make sure your itinerary passes too, you should be fine. An Ethics Committee Staff Attorney must review and approve as well. Your Staff Attorney is Susan.

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88. Ms. Olson then sent Ms. Louis additional questions about the corporate entities previously identified as "sponsors."⁸⁵

From: Olson, Susan
 Sent: Friday, October 12, 2007 2:41 PM
 To: plouis
 Cc: Kelly Mobley, Dawn; O'Reilly, Bill
 Subject: RE: CARB News - Pre-trip Approval Issues

Ms. Louis,

Please explain in more detail your email message below relative to the "sponsors contribute to the overall expense of the trip." In this regard, do the following entities pay for any of the expenses of the trip for the invited House Members, including roundtrip air transportation costs, lodging costs, meal costs, cost of a particular meal or reception, etc.?

- o Antigua Government
- o Sandals
- o Royal Caribbean Bakery
- o CITI
- o Pfizer
- o Macy's
- o AT&T
- o HSBC
- o IBM

- o Goodworks International
- o Preferred Health Partners
- o Antigua & Barbuda
- o American Airlines
- o Golden Krust

Susan L. Olson
 Counsel
 House Committee on Standards of Official Conduct

89. Three days later, Ms. Louis sent an e-mail to Ms. Mobley, but addressed to Ms. Olson.⁸⁶ This may have been inadvertent or, based on their previous practice, Ms. Louis may have

⁸⁵ E-mail from Susan Olson to Patricia Louis (Oct. 12, 2007 2:41 PM EST) (Exhibit 17 at 09-2567 0155).

⁸⁶ E-mail from Patricia Louis to Dawn Kelly Mobley (Oct. 18, 2007 11:00 AM EST) (Exhibit 17 at 09-2567 0153).

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done this before she then sent it to Ms. Olson. This is the final communication regarding the 2007 conference provided to the OCE.

From: plouis [plouis@nyocaribnews.com]
 Sent: Monday, October 18, 2007 11:00 AM
 To: Kelly Mobley, Dawn
 Subject: RE: Carib News - Pre-110 Approval Issues

Ms. Olson,
 In response to your e-mail, the answer to your question is NO.
 Regards and Thanks for your patience.

Patricia Louis
 Executive Assistant
 CARIB NEWS
 7 West 36th Street, 8th Floor
 New York, NY 10018

90. In an interview with the OCE, a staff member of Representative Rangel's office, Staff Member 1 of Congressman Rangel's Office, described discussions with Ms. Louis and Ms. Mobley in 2007 on the topic of how the new travel rules would affect the Members' participation in the 2007 conference.⁸⁷ The staff member said that Ms. Louis, and Mr. and Mrs. Rodney told him that the then Chair of the Standards Committee had assigned her counsel on the Committee, Ms. Mobley, to "find a way" to allow Members of Congress to participate in the conference under the new travel rules passed by the House in 2007.⁸⁸ The staff member told the OCE that Congressman Rangel told him that the then-Chair had made similar statements to him.

91. Staff Member 1 of Congressman Rangel's Office said the "framework" that was decided upon was that the Carib News Foundation would raise money from corporate donors who had previously sponsored the conference and that this money in turn would be deposited in a "common fund" that would then be used to pay for the conference. It was Staff Member 1 of Congressman Rangel's Office's understanding that if this was done, then Members of Congress could participate in the conference without any restrictions imposed by the new rules. Staff Member 1 of Congressman Rangel's Office said that it was important to break the link between the corporations and the conference under the new rules and that using the Foundation in this way would enable that to happen. Staff

⁸⁷ Memorandum of Interview of Staff Member 1 of Congressman Rangel's Office (May 27-28, 2009) (Exhibit 22).

⁸⁸ *Id.* at 09-2657 0235.

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Member 1 of Congressman Rangel's Office said he learned of this new framework for the conference from Mr. and Mrs. Rodney and that they represented this approach had come from Ms. Mobley on the Standards Committee.


92. This conduct in 2007 is relevant to the present review for a number of reasons. First, in and of itself, the intervention of the Chair's counsel in this matter is troubling and more likely constituted an improper manipulation of the clearance process. Following Ms. Mobley's intervention, Carib News Foundation changed the Private Sponsor Travel Certification Form to delete any mention of private sponsors before it was sent to the Standards Committee's staff attorney assigned to review the matter. This occurred after Carib News Foundation had told Ms. Mobley that these corporations were sponsors of the conference on several occasions. Ms. Louis's initial, and presumably truthful, submissions regarding the conference described the corporate entities as sponsors. However, if the corporations were sponsors of the conference, as opposed to Carib News Foundation, then the Members of Congress ability to attend would have been limited because, the corporations, unlike the Carib News Foundation, employed or retained lobbyists. It appears from the correspondence between Ms. Mobley and Ms. Louis, and Ms. Olson's apparent ignorance of the correspondence, that Ms. Mobley assisted Ms. Louis in preparing inaccurate answers for Ms. Olson in order to ensure that Ms. Olson would approve the trip in a manner that would not limit the attendance of the Members of Congress. Ms. Mobley's involvement in the process seems to have prevented the Standards Committee and its staff from correctly performing its responsibilities. Ms. Olson's approval of the trip was predicated on an incomplete or inaccurate factual record, in which Ms. Mobley apparently was complicit, putting at risk those Members of Congress who relied on that approval.
93. The 2007 conduct and attendant misrepresentations appear to have directly influenced what occurred in 2008. When the Carib News Foundation submitted materials to the Standards Committee for their approval of the 2008 conference, the Carib News Foundation took the same approach that they had been counseled to take in 2007 and did not disclose the role of the corporate sponsors on the Private Sponsor Travel Certification Form or the conference agenda.
94. In fact, in 2008, Carib News Foundation again first submitted its document to Ms. Mobley.⁸⁹ The Board notes that while Ms. Mobley remains an employee of the U.S. House of Representatives as of the date of this report, the above described conduct did not occur after the day the House passed the resolution creating the OCE, and therefore,

⁸⁹ Fax from Patricia Louis to Dawn Kelly Mobley (Aug. 20, 2008) (Exhibit 23 at 09-2567 0247-0269).

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under the terms of the that resolution, the OCE does not have jurisdiction to open a preliminary review into Ms. Mobley's conduct.

 THE NEW YORK CARIBNEWS <small>THE WEEKLY VOICE OF THE CARIBBEAN-AMERICAN COMMUNITY 7 WEST 35TH STREET, 81 FLOOR, NEW YORK, NY 10018</small>	
TEL: (212) 944-1991; FAX: (212) 944-2089 E-MAIL ADDRESS: <u>NYCARIB@AOL.COM</u> ; <u>CARIBNEWS@ATT.NET</u>	
FACSIMILE TRANSMITTAL SHEET	
TO:	FROM:
Kelly Mobley	Patricia Louis
COMPANY:	DATE:
Committee on Standards of official conduct	8/20/08
FAX NUMBER:	TOTAL NO. OF PAGES INCLUDING COVER:
202-225-7392	
RE: 2008 MULTINATIONAL BUSINESS CONFERENCE	
<input type="checkbox"/> URGENT <input type="checkbox"/> FOR REVIEW <input type="checkbox"/> PLEASE COMMENT <input type="checkbox"/> PLEASE REPLY <input type="checkbox"/> YOUR INFORMATION	
Following is the completed form and attachments re travel for Members of Congress to attend the 2008 Multinational Business Conference scheduled for November 6-9, 2008 in St. Maarten.	
Regards	

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IV. The Value of the Trip Reported on the Member's Post-Travel Disclosure Form

95. *Under House Rule 25 clause 5(d), Members are required to obtain prior approval of the Standards Committee for trips where the Member's travel expenses will be reimbursed by a private source. The Standards Committee has adopted regulations, including a pre- and post-travel form Members must complete, pursuant to House Rule 25 clause 5(h)(i)(1)(B)⁹⁰ that requires Members to publicly disclose "trip expenses."*

96. *According to the House Ethics Manual, "[t]he rule and implementing regulations are concerned with the organization(s) or individual(s) that actually pay for travel." House Ethics Manual (2008) at 97.*

97. There is substantial reason to believe that Congresswoman Kilpatrick violated House Rule 25 clause 5(h)(i)(1)(B) by underreporting the value of the travel reimbursements she received to attend the 13th Annual Caribbean Multi-National Business Conference.

A. Representations from Carib News Foundation

98. Carib News Foundation submitted a Private Sponsor Travel Certification Form to each Member it sponsored for the 2008 trip—Representatives Christensen, Kilpatrick, Payne, Rangel and Thompson.⁹¹ This form was provided to each Member Office and then submitted by the Member Office to the Standards Committee as part of the pre-travel approval process.

⁹⁰ House Rule 25(5)(h)(i)(1)(B) directs the Standards Committee to establish, "regulations describing the information it will require individuals subject to this clause to submit to the committee in order to obtain the prior approval of the committee for any travel covered by this clause . . ." On February 20, 2007, the Committee issued guidelines and regulations concerning the travel restrictions and requirements.

⁹¹ Private Sponsor Travel Certification Form signed by Karl Rodney (Oct. 3, 2008) (Exhibit 1 at 09-2567 0012).

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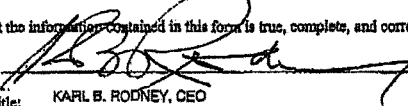
21. **TOTAL EXPENSES FOR EACH PARTICIPANT:**

<input type="checkbox"/> Actual amounts <input type="checkbox"/> good faith estimates	Total Transportation Expenses per Participant	Total Lodging Expenses per Participant	Total Meal Expenses per Participant
For each Member, Officer, or employee	410	280	145
For each accompanying family member	410	0	145

	Other Expenses (dollar amount)	Identify Specific Nature of "Other" Expenses (e.g., taxi, parking, registration fee, etc.)
For each Member, Officer, or employee	\$150 \$ 75	Conference Registration Local transportation
For each accompanying family member		

22. I represent that reimbursement for miscellaneous travel expenses for the trip, such as travel to and from airports, security costs, interpreter fees, visa application fees, and similar expenses, will be for actual costs incurred and are necessary for the purpose of the trip (signify "yes" by checking box):

23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: 

Name and title: KARL B. RODNEY, CEO

Organization: CARIB NEWS FOUNDATION


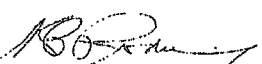
99. The Board notes that the Carib News Foundation provided the same exact dollar figure for each Member of Congress that attended the conference despite the fact that Carib News Foundation recognized on the same form that the Congressional travelers were travelling to and from different cities. In fact, the Congressional travelers came from St. Croix, U.S. Virgin Islands; Detroit, Michigan; Newark, New Jersey; New York, New York; and Jackson, Mississippi.

100. After the conference, the Carib News Foundation provided a memorandum to Representatives Rangel, Thompson, Payne and Kilpatrick and Delegate Christensen that represented to contain the value of the trip-related reimbursements.⁹²

⁹² Memorandum from Carib News Foundation to Representatives Rangel, Thompson, Payne and Kilpatrick and Delegate Christensen (Nov. 18, 2008) (Exhibit 1 at 09-2567 0004-0005).

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	Carib News Foundation 7 West 36th Street, 8th New York, NY 10018 Tel: (212) 944-1591 Fax: 14-2089 E-mail:												
	info@caribnewsconference.com												
<hr/> TO : Congressman Charles Rangel Congresswoman Donna Christensen Congressman Bennie Thompson Congressman Donald Payne Congresswoman Carolyn Cheeks Kilpatrick													
FROM : Karl B. Rodney													
DATE : November 18, 2008													
<hr/> SUBJECT : Business Conference Travel Information													
<p>The following is the breakdown of the value for the 13th Annual Caribbean Multi-National Business Conference held in St. Maarten, N.A. from November 6-9, 2008.</p> <table> <tr> <td>Airfare</td> <td>-</td> <td>\$410.00</td> </tr> <tr> <td>Hotel</td> <td>-</td> <td>\$405.00</td> </tr> <tr> <td>Registration/</td> <td>-</td> <td>\$175.00</td> </tr> <tr> <td>Transportation</td> <td></td> <td></td> </tr> </table> <p>Total amount of package = \$990.00</p> 		Airfare	-	\$410.00	Hotel	-	\$405.00	Registration/	-	\$175.00	Transportation		
Airfare	-	\$410.00											
Hotel	-	\$405.00											
Registration/	-	\$175.00											
Transportation													

101. The Board notes that the Carib News Foundation provided the same "total transportation" figure to the Congressional travelers despite the fact that Carib News Foundation had, in its own files, airline tickets and receipts for each Congressional traveler that showed, with the exception of Congressman Payne, that the actual cost of the ticket was significantly higher.

102. In addition, according to Mr. Rodney, the cost charged to individuals to attend the conference for four days and three nights was \$840 for double occupancy or \$1085 for single occupancy. The cost of attendance included "room accommodations, meals, and admission to the Conference." However, these figures were not disclosed pre-travel to the Members or the Standards Committee, nor were these figures disclosed to the Members after the conference.

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B. Information Required from the Congressional Traveler

103. On her Member/Officer Post-Travel Disclosure Form,⁹³ Representative Kilpatrick certified her travel cost as the following:

9. **TRIP EXPENSES:** Obtain actual dollar amounts from the sponsor. If exact dollar amounts are unavailable by the due date, provide a good faith estimate and file an amended form once the correct amounts are received.

	Total Transportation Expenses	Total Lodging Expenses	Total Meal Expenses
For Member or Officer:	\$410.00	\$405.00	
For accompanying family member:	\$410.00	\$405.00	

	Other Expenses (dollar amount)	Specific Nature of Expenses (e.g., taxi, parking, registration fee, etc.)
For Member or Officer:	\$175.00	Registration Fee
For accompanying family member:	\$175.00	Registration Fee

I certify that the information contained in this form is true, complete, and correct to the best of my knowledge. I have determined that all of the expenses listed above were necessary and that the travel was in connection with my duties as a Member or Officer of the U.S. House of Representatives and would not create the appearance that I am using public office for private gain.

SIGNATURE OF MEMBER: Carolyn C. Kilpatrick
DATE: Nov. 19, 2008

104. These figures are identical to the ones provided to Congresswoman Kilpatrick from Mr. Rodney on November 18, 2008.⁹⁴

105. However, documents from Congresswoman Kilpatrick's office show her airline ticket cost \$626.15, not \$410.⁹⁵ Representative Kilpatrick had copies of her flight itinerary showing this cost and the receipt for the tickets themselves in her files.

⁹³ Member/Officer Post-Travel Disclosure Form signed by Representative Carolyn Cheeks Kilpatrick (Nov. 20, 2008) (Exhibit 1 at 09-2567 0002).

⁹⁴ Memorandum from Carib News Foundation to Representatives Rangel, Thompson, Payne and Kilpatrick and Delegate Christensen (Nov. 18, 2008) (Exhibit 1 at 09-2567 0004-0005).

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Reservations - Book Flight - View Reservation Details Page 2 of 3

Flight:	AMERICAN AIRLINES	390	Boeing 737-800:Passenger	Booking Code: Q
Departure:	MIA Miami	08:25 PM	(736)	
Arrival:	DTW Detroit	11:30 PM		3HR 5MIN
	KILPATRICK, CAROLYN SEAT 13C	Economy	FF# :AA AB33U50	

Receipt				
PASSENGER	TICKET NUMBER	FARE	TAXES	TICKET TOTAL
KILPATRICK,CAROLYN	D01219D117150	548.80 USD	77.35	626.15
Payment Type:	AMERICAN EXPRESS *****9426			Total 626.15 USD

106. Also in her files is a fax cover sheet that indicates she was sent the itinerary that showed the cost.⁹⁶



**Office of
Congresswoman Carolyn Cheeks Kilpatrick**

Date: 11/05/2008 Cover sheet plus 5 pages

To: CCK Office: _____

Fax Number: _____ Telephone Number: _____

Re: _____

Urgent For Review Please Comment Please Reply

Comments: Flight Info

107. Representative Kilpatrick told the OCE that, as a matter of practice, staff gave her copies of her itinerary before any flight.⁹⁷

⁹⁵ Flight Reservation for Representative Carolyn Cheeks Kilpatrick (Nov. 5, 2008) (Exhibit 24 at 09-2567 0273).

⁹⁶ *Id.* at 09-2567 0271.

⁹⁷ Memorandum of Interview of Representative Carolyn Kilpatrick (May 14, 2009) (Exhibit 2 at 09-2567 0032).

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108. According to the registration document in Congresswoman Kilpatrick's office files, her lodging, a "Conference Package Suite" cost \$1198, not \$580 (which includes housing and registration) as reported.⁹⁸

Thirteenth Annual Caribbean Multi Business Conference Registration Form - PI	
SAINT MAARTEN . NOVEMBER €	
<p>Before you begin your application, you may want to gather your supplementary documentation so that you have it to complete all sections of the application form except for, in some cases, section 4 ("Transportation"). After you have it within 24 hours. For more information please contact NY Carib News at 212-844-1891.</p>	
<p>Step One - Applicant Profile Please provide the following contact information.</p>	
*Last Name: [Kilpatrick]	*First Name: [Carolyn]
*E-mail Address: [ckkilpatrick@mail.house.gov]	Home Phone: _____
Business Name: [U.S. House of Representatives]	Business Phone: [(202) 226-2261]
Business Address: [2264 Rayburn HOB]	Business Address (co): _____
Type of Business: [Government]	Area of Interest: _____
<p>Step Two Part A - Accommodation (Standard Rooms) Choose Either Standard or Suite Please choose an accommodation package, if you choose the double occupancy option, we ask that you provide the name of Beach Hotel. Please use this opportunity to make any special requests such as extra nights.</p>	
<p>Extra Night Rate For Standard Rooms - \$180 per night based on Double Occupancy and \$265 per night based on provided packages, please contact us directly.</p>	
<p>Single Occupancy Packages [Standard Accommodation - Single] <input type="checkbox"/></p> <p>Double Occupancy [Standard Accommodation - Double] <input type="checkbox"/></p>	Rooming with... _____
<p>Sports: Golf <input type="checkbox"/> Small <input type="checkbox"/></p>	
<p>Step Two Part B - Accommodation (Suite Rooms - Limited Availability) Choose Either Standard or Suite Please choose an accommodation package, if you choose the double occupancy option, we ask that you provide the name of Beach Hotel. Please use this opportunity to make any special requests such as extra nights.</p>	
<p>Extra Night Rate For Suite Rooms - \$250 per night based on Double Occupancy and \$325 per night based on provided packages, please contact us directly.</p>	
<p>Single Occupancy Packages [Conference Package Suite - \$1198] <input type="checkbox"/></p> <p>Double Occupancy [Suite Accommodation - Double] <input type="checkbox"/></p>	Rooming with... _____
<p>Sports: Golf <input type="checkbox"/> Small <input type="checkbox"/></p>	

109. Representative Kilpatrick told the OCE that she gave her scheduler instructions as to what type of room she wanted.⁹⁹ Representative Kilpatrick also confirmed that she stayed in a suite at the conference.¹⁰⁰

⁹⁸ 13th Annual Caribbean Multi-National Business Conference Registration Form of Representative Carolyn Cheeks Kilpatrick (Exhibit 22 at 09-2567 0275).

⁹⁹ Memorandum of Interview of Representative Carolyn Kilpatrick (May 14, 2009) (Exhibit 2 at 09-2567 0032).

¹⁰⁰ *Id.* at 09-2567 0031.

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V. More Than One Family Member Accompanied Congresswoman Kilpatrick on the Trip

110. Pursuant to the House Ethics Manual:

It is permissible for a Member, officer, or employee participating in officially connected travel paid for by a private source to be accompanied by a relative on the trip (House Rule 25, clause 5(b)(4)(D)) . . . Further, this provision allows the acceptance of expenses for only one relative. For example, a Member, officer, or employee, if offered by the sponsor, may accept expenses for a spouse or one child only, not a spouse and a child. The travel expenses paid for a relative must be specified by the private source and traveler on the pre-travel forms and reported on travel disclosure forms in the same manner as those paid for the Member, officer, or employee.¹⁰¹

111. Documents obtained from Mr. Rodney indicate that Congresswoman Kilpatrick brought her daughter and infant granddaughter with her as "accompanying relatives."¹⁰²

<p>From: "Bragg, Andrea" <Andrea.Bragg@mail.house.gov> To: <carib-desk@att.net> Subject: FW: Room information Date: Friday, October 31, 2008 12:14:51 PM</p> <p>Patricia, Ayanna Kilpatrick will be staying with Congresswoman Kilpatrick along with Annays Ferguson (7-months-old). Please add a crib to the room. The travel dates are Thursday, November 6 thru Sunday, November 9. Thank you. Andrea Bragg Executive Assistant/Scheduler for Congresswoman Carolyn Kilpatrick 1274 Library Suite 1B Detroit, Michigan 48226 (313) 965-6004 (office) (313) 965-9006 (fax)</p>
--

112. This fact was not disclosed on her pre- or post-travel disclosure forms. On these forms Congresswoman Kilpatrick listed her sister as her accompanying relative.¹⁰³

113. Congresswoman Kilpatrick confirmed in an interview with the OCE that in fact she brought her daughter and granddaughter.¹⁰⁴

¹⁰¹ House Ethics Manual (2008) at 101.

¹⁰² E-mail from Andrea Bragg to Patricia Louis (Oct. 31, 2008 12:14 PM EST) (Exhibit 17 at 09-2567 0277.1).

¹⁰³ Member/Officer Post-Travel Disclosure Form signed by Representative Carolyn Cheeks Kilpatrick (Nov. 20, 2008) (Exhibit 1 at 09-2567 0002).

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114. By bringing her daughter and granddaughter to the conference, there is substantial reason to believe that Congresswoman Kilpatrick violated the limitation that a Member may only bring one family member with them on privately sponsored travel.¹⁰⁵

VI. Carib News Foundation, as a Private Foundation, Was Prohibited From Paying for Congresswoman Kilpatrick's Travel

115. The Carib News Foundation is identified as the "sponsor" of this conference on at least three forms filed with the Committee on Standards of Official Conduct: (1) the "Private Sponsor Travel Certification Form,"; (2) the "Privately Sponsored Travel: Travel Form," and; (3) the "Member/Officer Post-Travel Disclosure Form."¹⁰⁶
116. According to a query of the New York State's Office of the Secretary of State, Mr. Rodney appears to operate two organizations – the "Carib News, Inc" which operates a newspaper and the "Carib News Charities, Inc" which also may operate under the name "Carib News Foundation." The OCE has not been able to identify any additional activity, other than the annual Caribbean Multi-National Business Conference, in which the latter organization is involved. Furthermore, while "Carib News Charities, Inc" / "Carib News Foundation" is listed with New York's Office of the Secretary of State as a domestic not-for-profit corporation, it is not listed, as required by law, with the New York State Charities Bureau. In addition, there is no evidence that the organization has filed a tax return with the IRS, under either name, since 2005.¹⁰⁷ According to Publication 78 of the IRS, a list of all charities claiming 501(c) status, Carib Charities, Inc is a private foundation.¹⁰⁸
117. Every organization that qualifies for tax exemption described in section 501(c)(3) of the Internal Revenue Code is defined as a private foundation unless the organization falls into one of the categories specifically excluded from the definition under section 509(a).¹⁰⁹ In effect, the definition divides 501(c)(3) organizations into two classes: private foundations and public charities. Private foundations are generally funded through a single donor, family or corporation and operate through investment income;

¹⁰⁴ Memorandum of Interview of Representative Carolyn Kilpatrick (May 14, 2009) (Exhibit 2 at 09-2567 0031).

¹⁰⁵ House Ethics Manual (2008) at 101.

¹⁰⁶ Member/Officer Post-Travel Disclosure Form signed by Representative Carolyn Cheeks Kilpatrick (Nov. 20, 2008) (Exhibit 1 at 09-2567 0002).

¹⁰⁷ Letter from IRS to OCE (Apr. 17, 2009) (Exhibit 8 at 09-2567 0106-0118.2).

¹⁰⁸ Online Version of Publication 78 (Accessed online on June 5, 2009 at <http://www.irs.gov/app/pub-78/>) (Exhibit 8 at 09-2567 0118.1-0118.2).

¹⁰⁹ 26 U.S.C. §§ 501 and 509.

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whereas, public charities are typically funded and operated through diversified support from governmental sources and the general public.

118. There are several restrictions that are placed on private foundations. At issue here is the restriction on “self-dealing” between a disqualified person (the definition of which includes Members of Congress) and a private foundation.¹¹⁰ The Code defines the act of “self-dealing” to include any direct or indirect agreement to make any payment of money (including reimbursement of expenses) or other property by a private foundation to a government official.¹¹¹ Although framed as a tax provision, the statute essentially bars certain federal employees and federally elected officials from receiving compensation, including reimbursements for international travel, from a private foundation.¹¹²
119. As such, it appears that the Carib News Foundation’s payment of travel expenses for Representative Kilpatrick and her acceptance of payment potentially violated the Internal Revenue Code.
120. The Board infers from the fact that the Standards Committee approved the reimbursement that the Standards Committee is unaware of this restriction. The Board notes, however, that its own research revealed that numerous other ethics-related entities in the federal government are aware of this restriction, and have for some time been enforcing it.¹¹³
121. Congresswoman Kilpatrick told the OCE that she was unaware of any limitations on the ability of private foundations to pay for overseas travel by government officials.¹¹⁴
122. The Board notes that these facts show failures at multiple points by multiple parties in complying with and enforcing the travel rules. Inaccurate information was provided by the Carib News Foundation to Members and the Standards Committee. Congresswoman Kilpatrick certified inaccurate information to the Standards Committee and failed to disclose the number of family members accompanying her. The counsel to the former Chair of the Standards Committee intervened in the review process in a way that both frustrated the process in 2007 and set a pattern of obfuscation that continued in 2008.

¹¹⁰ 26 U.S.C. §§ 4941 and 4946.

¹¹¹ 26 U.S.C. § 4941(d)(1)(F). The Code imposes a tax (currently 10 percent of the amount involved) on the illegal payments, with later penalties (up to \$20,000 per act of self-dealing) for failure to pay back the foundation. The tax is imposed on the disqualified person, including a government official if the official participates in the act of self-dealing knowingly.

¹¹² The payment or reimbursement of travel expenses for travel solely from one point in the United States to another point in the United States is excepted from the definition of self-dealing provided that the payment or reimbursement does not exceed the actual cost of the transportation involved and provided the amount for all other traveling expenses does not exceed 125 percent of the maximum amount payable under section 5702 of title 5, United States Code, for like travel by employees of the United States. 26 U.S.C. § 4941(d)(2)(G)(vii).

¹¹³ Memorandum from Ethics Counsel at the National Institutes of Health to Deputy Ethics Counsels at NIH (Jun. 2, 2000) (Exhibit 25 at 09-2567 0279-0281).

¹¹⁴ Memorandum of Interview of Representative Carolyn Kilpatrick (May 14, 2009) (Exhibit 2 at 09-2567 0031).

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended:

Finally, the Standards Committee appears unaware of limitations on the ability of private foundations to pay for overseas travel by Members.

123. For all these reasons, the Board concludes further review of this matter by the Standards Committee is appropriate.

Exhibit 1

HAND DELIVERED

 Original AmendmentU.S. House of Representatives
110th Congress

MAY 20 11 56

MEMBER / OFFICER
POST-TRAVEL DISCLOSURE FORM

This form is for disclosing the receipt of travel expenses from a private source for meetings, speaking engagements, fact-finding trips or similar events in connection with official duties. You need not disclose government-funded or political travel on this form, or travel that is unrelated to official duties. This form does not eliminate the need to report all privately-funded travel on the Member or officer's annual Financial Disclosure Statement. In accordance with clause 5 of House Rule 25, complete this form and file it with the Clerk of the House of Representatives, B-106 Cannon House Office Building, within 15 days after travel is completed. The Clerk is to make these forms available to the public as soon as possible after they are received.

1. Name of Traveler: Carolyn Cheeks Kilpatrick
2. a. Name of Accompanying Family Member (if any): Marsha Cheeks
b. Relationship to Member/Officer: Spouse Child Other (specify): Sister
3. a. Date of Departure and Date of Return: Depart: Nov 6, 2008, Return - Nov 9, 2008
b. Dates at personal expense (if any): NONE
4. Itinerary (cities of departure - destination - return): - Attached -
5. Sponsor(s) (who paid for the trip): Carib News Foundation
6. Describe meetings and events attended (attach additional pages if necessary): I participated in a Business Conference to give appropriate Congressional and current legislative perspective on the topic of discussion "U.S. - Caribbean relations."
7. Attached to this form are EACH of the following (signify that each item is attached by checking the corresponding box):
a. the Private Sponsor Travel Certification Form completed by trip sponsor, including all attachments;
b. the Traveler Form completed by the Member or officer; and
c. the Committee on Standards' letter approving my participation on this trip.
8. a. I represent that I participated in each of the activities reflected in the sponsor's agenda (Signify that statement is true by checking box):
b. If not, explain:

9. TRIP EXPENSES: Obtain actual dollar amounts from the sponsor. If exact dollar amounts are unavailable by the due date, provide a good faith estimate and file an amended form once the correct amounts are received.

	Total Transportation Expenses	Total Lodging Expenses	Total Meal Expenses
For Member or Officer:	\$410.00	\$405.00	
For accompanying family member:	\$410.00	\$405.00	

	Other Expenses (dollar amount)	Specific Nature of Expenses (e.g., taxi, parking, registration fee, etc.)
For Member or Officer:	\$175.00	Registration Fee
For accompanying family member:	\$175.00	Registration Fee

I certify that the information contained in this form is true, complete, and correct to the best of my knowledge. I have determined that all of the expenses listed above were necessary and that the travel was in connection with my duties as a Member or Officer of the U.S. House of Representatives and would not create the appearance that I am using public office for private gain.

SIGNATURE OF MEMBER: *Charles C. Delapatrik*
 DATE: Nov. 19, 2008

Version date: 5/2004. Committee on Standards of Official Conduct



Carib News Foundation
7 West 36th Street, 8th
New York, NY 10018
Tel: (212) 944-1991 Fax:
14 2089

E-mail:

info@caribnewsconference.com

TO : Congressman Charles Rangel
Congresswoman Donna Christensen
Congressman Bennie Thompson
Congressman Donald Payne
Congresswoman Carolyn Cheeks Kilpatrick

FROM : Karl B. Rodney

DATE : November 18, 2008

SUBJECT : Business Conference Travel Information

The following is the breakdown of the value for the 13th Annual Caribbean Multi-National Business Conference held in St. Maarten, N.A. from November 6-9, 2008.

Airfare	-	\$410.00
Hotel	-	\$405.00
Registration/	-	\$175.00
Transportation		

Total amount of package = \$990.00

Scott, Roxanne

From: carib-desk@att.net
Sent: Wednesday, November 19, 2008 3:37 PM
To: carib-desk@att.net
Subject: Post-Travel information
Attachments: Disclosure information for Business Conference 2008.doc

Please disregard previous e-mail.

Attached is information for the post-travel disclosure form, with regard to the 2008 Business Conference held in St. Maarten, November 6-9, 2008.

Regards

--
Patricia Louis
Executive Assistant
NY Carib News
Ph: (212) 944-1991
Fax: (212) 944-2089

11/19/2008

09-2567 0006

U.S. House of RepresentativesCOMMITTEE ON STANDARDS OF
OFFICIAL CONDUCT

Washington, DC 20515

October 21, 2008

The Honorable Carolyn C. Kilpatrick
U.S. House of Representatives
2264 Rayburn House Office Building
Washington, DC 20515

Dear Colleague:

Pursuant to House Rule 25, clause 5(d)(2), the Committee on Standards of Official Conduct hereby approves your proposed trip for you and your sister to St. Maarten, N.A. scheduled for November 6 to 9, 2008 sponsored by the Carib News Foundation.

You must complete a Member Travel Disclosure Form and file it with the Clerk of the House within 15 days after your return from travel. As part of that filing, you are required to attach a copy of this letter and the Private Sponsor Travel Certification Form, including attachments. You must also report all travel expenses totaling more than \$335 from a single source on Schedule VII of your annual Financial Disclosure Statement.


Because the trip may involve meetings with foreign government representatives, we note that House Members may accept, under the Foreign Gifts and Decorations Act, gifts "of minimal value [currently \$335] tendered as a souvenir or mark of courtesy" by a foreign government. Any tangible gifts valued in excess of \$335 received from a foreign government must, within 60 days of acceptance, be disclosed on a Form for Disclosing Gifts from Foreign Governments and either turned over to the Clerk of the House, or, with the written approval of the Committee, retained for official use.

However, we would note that since this trip is scheduled to commence after the general election on November 4, 2008 and because officially-connected travel must be related to official duties, it may be questionable whether a Member who was not reelected in the general election should to accept an invitation for a trip that is fact-finding in nature. Arguably, as of that time, the official responsibilities that may justify the acceptance of travel expenses for such a purpose will have come to an end. This consideration generally will not limit the Committee's authority to approve travel of a departing Member to participate substantially in an officially-related event (for example, to give a speech). Please keep this guidance in mind, as you may need to reevaluate your ability to participate in the trip following the election.

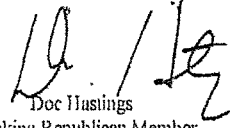
The Honorable Carolyn C. Kilpatrick
October 21, 2008
Page 2

If you have any further questions, please contact the Committee's Office of Advice and Education at extension 5-7103.

Sincerely,



Gene Green
Acting Chairman



Doc Hastings
Ranking Republican Member

GIG/11:pgp



Government of Sint Maarten

Sarah Wescot-Williams, M.Sc.

Telephone:
(599) 543-1166

Fax:
(599) 542-4292

E-mail:
commiss@stintmaarten.nl

St. Maarten, August 28, 2008

Congresswoman Caroline Cheeks Kilpatrick
U.S. House of Representatives
1610 Longworth HOB
Washington, DC 20515
Phone: 202-225-2261
Fax: 202-225-5730

RECEIVED

SEP 18 2008

Cheeks, Kilpatrick
Office

Honorable Congresswoman Kilpatrick,

The well-known Carib News Foundation has once more chosen our island, St. Maarten, as venue for its 13th Annual Caribbean Multi-National Business Conference scheduled to be held from November 6 – 9, 2008 at the Sonesta Maho Beach Resort & Casino. The conference is being held under the theme: "A Region in Transition Strategy for Change, Alliance for Progress".

We are thrilled to host this very important and prestigious conference and it is my distinct pleasure, on behalf of the government and people of St. Maarten, to invite you personally to be part of this gathering which we hope would, as its theme suggests, map out a strategy for change and a reinvigorated alliance for progress during this period of obvious transition in U.S. Caribbean relations.

St. Maarten, widely known as The Friendly Island, is not a typical sun-sea-and-sand destination in the Caribbean, but perhaps the most unique and cosmopolitan island in the region, given its size and its rich cultural diversity.

Considered the "culinary capital of the Caribbean," St. Maarten was ranked third in the world and first in the Caribbean in this year's inaugural TripAdvisor Travelers' Choice Destinations Awards. It is an honor that we cherish very much since the choice was made among millions of "real travelers" who know the vacation destinations the best.

The Caribbean Multi-National Business Conference offers you a fine opportunity to combine business with pleasure on our island with a wide variety of activities, a pulsating nightlife, absolutely duty-free shopping, and 37 beautiful beaches to choose from.

Similarly, our vibrant investment climate offers numerous opportunities for investors in an atmosphere of peace and stability.

I am personally looking forward to welcoming you to our island, and assure you that we will do everything within our power to make your stay a very memorable and pleasant experience.

May I avail myself of this opportunity to renew to you the assurances of my highest consideration and esteem.

Sincerely,


Commissioner Sarah Wescot-Williams,
Leader of Government.

U.S. House of Representatives
Committee on Standards of Official Conduct

PRIVATELY SPONSORED TRAVEL: TRAVELER FORM
For Members, Officers, and Employees

1000-1001
10/23/01

This form should be completed by House Members, officers, or employees seeking Committee approval of privately-sponsored travel or reimbursement for travel under House Rule 25, clause 5. The completed form should be submitted directly to the Committee by each invited House Member, officer, or employee, together with the completed and signed Private Sponsor Travel Certification Form and any attachments. A copy of this form, minus this initial page, will be made available for public inspection. Please type form. Form (and any attachments) may be faxed to the Committee at (202) 225-7392.

YOUR COMPLETED REQUEST MUST BE SUBMITTED TO THE COMMITTEE NO LESS THAN 14 DAYS BEFORE YOUR PROPOSED DEPARTURE DATE. Absent exceptional circumstances, permission will not be granted for requests received less than 14 days before the trip commences.

Name of Traveler: *Congresswoman Carolyn C. Kilpatrick*

I certify that the information contained on both pages of this form is true, complete, and correct to the best of my knowledge.

Signature: *Carolyn C. Kilpatrick*

Name of Signatory (if other than traveler):

For staff, name of employing Member/Committee:

Office address: *2264 Rayburn House Office Building*

Phone number: *(202) 225-2261*

Email address of contact person: *cckilpatrick@mail.house.gov*

Check this box if the sponsoring entity is a media outlet and the traveler is a Member traveling to make a media appearance sponsored by that entity and these forms are being submitted to the Committee less than 14 days before the trip departure date.

NOTE: You must complete the contact information fields above, as Committee staff may need to contact you if additional information is required.

If there are any questions regarding this form please contact the Committee:

Committee on Standards of Official Conduct
U.S. House of Representatives
111-2, The Capitol
Washington, DC 20515
(202) 225-7103 (phone)
(202) 225-7392 (fax)

U.S. House of Representatives
Committee on Standards of Official Conduct

PRIVATELY SPONSORED TRAVEL: TRAVELER FORM

1. Name of Traveler: *Congresswoman Carolyn C. Kilpatrick*
2. Sponsor(s) (who will be paying for the trip): *Carib News Foundation*
3. Travel destination(s): *St. Maarten, NA*
4. a. Date of Departure and Date of Return: *Depart- November 6, 2008, Return November 9, 2008*
 b. Will you be extending the trip at your personal expense? Yes No
 If yes, dates at personal expense:
5. a. Will you be accompanied by a family member at the sponsor's expense? Yes No
 b. If yes, name of accompanying family member:
 c. Relationship to traveler: Spouse Child Other (specify):
6. a. Did the trip sponsor answer "yes" to Question 9(c) on the Trip Sponsor form (i.e., the travel is being sponsored by an entity that employs a lobbyist)? Yes No
 b. If yes, check one of the following: N/A Sponsor checked 9(a) or 9(b)
 (1) Approval for one-night's lodging and meals is being requested: or
 (2) Approval for two-nights' lodging and meals is being requested:
 If "(2)" is checked, explain why the second night is warranted:
7. Private Sponsor Travel Certification Form is attached, including agenda, invitee list, and any other attachments (indicate that form is attached by checking box):
8. Explain why participation in the trip is connected to your individual official or representational duties:
I will participate in a Business Conference to give appropriate Congressional and current legislative perspective on the topic of discussion "U.S. - Caribbean relations"
9. FOR STAFF:
 TO BE COMPLETED BY YOUR EMPLOYING MEMBER:

I hereby authorize the individual named above, an employee of the U.S. House of Representatives who works under my direct supervision, to accept expenses for the trip described in this request. I have determined that the above-described travel is in connection with my employee's official duties and that acceptance of these expenses will not create the appearance that the employee is using public office for private gain.

Date:

Signature of Employing Member

NOTE: This page must be submitted with your post-travel disclosure form within 15 days of your return, so you should maintain a photocopy of the completed form for your records.

U.S. House of Representatives
Committee on Standards of Official Conduct

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM
(provide directly to each House invitee)

This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers or employees under House Rule XXV, clause 5. A completed copy of the form (and any attachments) should be provided to each invited House Member, officer or employee, who will then forward it to the Committee. The trip sponsor should NOT submit the form directly to the Committee.

Private sponsors are urged to submit this form to each House invitee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the invitee not receiving approval for the trip. The submission of an incomplete form will delay the review process. Before completing this form, sponsors are urged to carefully review the Committee's private travel guidelines and advisory memoranda detailing the rules and restrictions for private travel, as well as the instructions for completing this form. Sponsors should call the Committee with any questions prior to submitting the form. Please type form.

1. Sponsor(s) (who will be paying for the trip): CARIB NEWS FOUNDATION
2. I represent that the trip will not be financed (in whole or in part) by a federally-registered lobbyist or a registered foreign agent (signify "yes" by checking box):
3. I represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip (signify "yes" by checking box):
4. Is travel being offered to an accompanying family member of the House invitee(s)? Yes No
5. Provide names and titles of ALL House invitees; for each invitee, provide explanation of why the individual was invited (include additional pages if necessary): BASED ON COMMITTEE OR SUB-COMMITTEE WHICH IMPACTS US/CARIBBEAN RELATIONS ON WHICH THE MEMBER SERVES.
6. Dates of travel: NOVEMBER 6-8, 2008
7. Cities of departure - destination - return: VARIES - DEPENDING ON MEMBER
8. Attached is a detailed agenda of the activities taking place during the travel (i.e., an hourly description of planned activities) (signify "yes" by checking box):
9. I represent that (check one of the following):
- The sponsor of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965: or
 - The sponsor of the trip does not retain or employ a federally registered lobbyist or registered foreign agent: or
 - The trip is for attendance at a one-day event and lobbyist involvement in planning, organizing, requesting, or arranging the trip was *de minimis* under the Committee's travel regulations.
10. If travel is for participation in a one-day event (i.e., if you checked Question 9(c)), check one of the following.
- One-night's lodging and meals are being offered: or
 - Two-nights' lodging and meals are being offered:
- If "b" is checked, explain why the second night is warranted: _____

11. If the trip is not sponsored by an institution of higher education, I represent that a federally-registered lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip (signify "yes" by checking box):

12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip:
 CARIB NEWS FOUNDATION (SEE ATTACHED)

13. Describe each sponsor's organizational interest in the purpose of the trip:
 THE INTEREST OF CARIB NEWS FOUNDATION IS TO PROMOTE, INFORM, TRADE AND ESTABLISHMENT OF MEANINGFUL CONNECTIONS BETWEEN THE U.S AND THE CARIBBEAN

14. Describe the type and class of the transportation being provided. Indicate whether coach, business-class or first-class transportation will be provided. In addition, for travel via aircraft, please indicate if travel is being offered on a commercial flight, chartered flight or on an aircraft operated or paid for by a carrier not licensed by the Federal Aviation Administration to operate for compensation or hire (i.e., a private aircraft). If first-class fare is being provided, or if travel is via chartered or private aircraft, please provide an explanation describing why such travel is warranted:
 REGULAR SCHEDULED AIR SERVICE, ECONDMY CLASS

15. I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s). (signify "yes" by checking box):

16. I represent that either (check one of the following):
 a. The trip involves an event that is arranged or organized without regard to congressional participation and that meals provided to congressional participants are similar to those provided to or purchased by other event attendees: **or**
 b. The trip involves events that are arranged or organized specifically with regard to congressional participation.

 If "b" is checked, detail the cost per day of meals (approximate cost may be provided):

17. Reason for selecting the location of the event or trip: SEE ATTACHED

18. Name of hotel or other lodging facility: BONESTA MAHO BEACH RESORT

19. Cost per night of hotel or other lodging facility (approximate cost may be provided): \$110.00

20. Reason(s) for selecting hotel or other lodging facility: HAS APPROPRIATE MEETING ROOMS

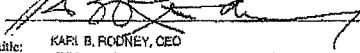
21. TOTAL EXPENSES FOR EACH PARTICIPANT:

<input type="checkbox"/> actual amounts <input type="checkbox"/> good faith estimates	Total Transportation Expenses per Participant	Total Lodging Expenses per Participant	Total Meal Expenses per Participant
For each Member, Officer, or employee	- 410	280	145
For each accompanying family member	410	0	145

	Other Expenses (dollar amount)	Identify Specific Nature of "Other" Expenses (e.g., taxi, parking, registration fee, etc.)
For each Member, Officer, or employee	\$150	Conference Registration
For each accompanying family member	\$ 25	Local transportation

22. I represent that reimbursement for miscellaneous travel expenses for the trip, such as travel to and from airports, security costs, interpreter fees, visa application fees, and similar expenses, will be for actual costs incurred and are necessary for the purpose of the trip (signify "yes" by checking box):

23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: 
 Name and title: KARL B. RODNEY, CEO
 Organization: CARIB NEWS FOUNDATION
 Address: 7 WEST 88th STREET, 8th FLOOR, NEW YORK, NY 10018
 Telephone number: (212) 844-1981
 Fax number: (212) 944-2089
 Email Address: CARIB-DESK@ATT.NET

The Committee staff may contact the above individual above if additional information is required.

If there are any questions regarding this form please contact the Committee at the following address:

Committee on Standards of Official Conduct
 U.S. House of Representatives
 HT-2, The Capitol
 Washington, DC 20515
 (202) 225-7183 (phone)
 (202) 225-7392 (general fax)
 (202) 226-7172 (fax for travel approvals)

Version date 4/2007 by Committee on Standards of Official Conduct

MEMBERS OF CONGRESS INVITED TO THE
THIRTEENTH ANNUAL MULTI-NATIONAL BUSINESS
CONFERENCE, NOVEMBER 6-9, 2008, ST. MAARTEN, N.A.

Congresswoman Diane B. Watson
Congressman David Scott
Congressman James Clyburn
Congresswoman Nydia Velazquez
Congressman Charles Rangel
Congressman Donald Payne
Congresswoman Donna M. Christensen
Congressman Edolphus Towns
Congressman G. K. Butterfield
Congressman Gregory Meeks
Congressman Jesse Jackson Jr.
Congressman Keith Ellison
Congressman Kendrick Meek
Congresswoman Maxine Waters
Congressman Melvin Watt
Congressman Robert Scott
Congressman William Lacy Clay
Congresswoman Barbara Lee
Congresswoman Caroline Cheeks Kilpatrick
Congresswoman Corrine Brown
Congresswoman Eddie Bernice Johnson
Congresswoman Sheila Jackson Lee
Congresswoman Yvette Clarke
Congressman Danny Davis
Congressman Bennie Thompson

July 2008



Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10017
Tel: (212) 944-1991, Fax: (212) 944-2089
E-mail: info@caribnewsconference.com

Item #12

CARIB NEWS FOUNDATION is organized to provide education and information about the Caribbean in the area of Business, Education, Health and Culture, Promote Good neighborly within the United States and the hemisphere.

The participants are selected to participate in the various workshops during the Conference based on their demonstrated interest, expertise and assignment in the United States Congress.

Item #17

A Caribbean country whose proximity to other Caribbean Countries makes it conveniently located for delegates from the other Caribbean countries to attend.

Organized by Carib News Foundation. A non-profit project 501-C3 corporation

Working Copy

13th Annual Caribbean Multi-National
Business Conference Program
St. Maarten, N.A.

THEME: *A REGION IN TRANSITION - STRATEGY FOR
CHANGE - BUILDING ALLIANCES*

Thursday, November 6, 2008

12:00noon - 6:00pm	CONFERENCE REGISTRATION -
--------------------	---------------------------

- 5:00 - 6:30 - **TOWN HALL FORUM - HEALTH**
 Innovative Solutions for Life styles
 Diseases- a Collaborative Approach - Diabetes,
 Hypertension, Obesity, Oral Health
- Speakers - Dr. Denzil Douglas - Prime Minister, St. Kitts and Nevis
 Mrs. Karen Boykin-Towns
 Hon Diane Watson, Member of US Congress
 Health Commissioner, St. Maarten
 Hon. Jesse Jackson Jr., Member of US Congress
- 6:30- 7:30pm - **OPENING RECEPTION**
- Venue: - POOLSIDE
- Theme: - **A REGION IN TRANSITION -**
- Speakers: - Faye A. Rodney
 Hon. Roy Marlin - Commissioner for Tourism & Finance - St
 Maarten.
 Hon. Yvette Clarke, Member of Congress

MC: - Sabrina Hosang - Royal Caribbean Bakery

7:30 - 9:30 pm - OPENING DINNER

Venue: - Main Ballroom

Theme: - STRATEGY FOR CHANGE

Greetings:

Speakers: - Dame Billie Miller

Hon. Donald Payne, Member US Congress

Hon. Nick Perry, New York State Assembly

Hon. G.K. Butterfield, Member of Congress

10:00pm - 1:00am: - HOSPITALITY AREA

Friday, November 7, 2008

8:00am - 8:45am - (BREAKFAST)

9:00am - 6:00pm CONFERENCE REGISTRATION

9:00am - 10:15am - OPENING CEREMONIES

Venue: - Main Ballroom

Theme: - BUILDING ALLIANCES FOR PROGRESS

- Invocation:** - Rev. Susan Johnson=Cook
- Anthem:** - St. Maarten
Lift Every Voice
- Remarks:** - Eric Eve
Karen Boykin-Towns
Marie Long
Ed Goldberg
Patrick Gaston
Hazel Dukes
- Speakers:** - Hon. Carolyn Cheeks Kilpatrick - Member
US Congress
Hon. Melvin Watt, Member of US Congress
Commissioner Sarah Wescot-Williams, Leader
of Government, St. Maarten
- Keynote Speaker** - Hon. Charles Rangel -Member US Congress

RIBBON CUTTING CEREMONIES

- 10:15am - 10:30am - COFFEE BREAK -
- 10:30am -11:45am PRESENTATION

Theme: " Health – an Economic development Strategy
For the Region"
Speakers: Hon. Donna Christensen, Member US Congress
Hon. Barbara Lee, Member US Congress
Dr. Carl Kanel-Pierre, Preferred Health Partners
Dr. Denzil Douglas, Prime Minister St.Kitts/Nevis
Hon. Yvonne Graham

10:30 – 11:45 - **PRESENTATION**
Theme - "Access to Capital – Creative and unique
Financial packages "
Speakers - Michele Chow Tai, HSBC Bank
Hon. Adolfo Carrion, Bronx Borough President
William Lacy Clay, Member of US Congress
Hon. Compton Bourne, President, CDB
Commissioner of Finance, St. Maarten
Hon. Keith Ellison, Member US Congress

12:00noon – 1:15pm - **PRESENTATION**
Theme: - **TRAVEL & TOURISM –**
Need for a Competitive Transportation Network
Emerging Tourism Market
Health Tourism

- Greeting:** - Dale Morris
- Speakers:** - Hon. Gregory Meeks, Member of US Congress
 Hon. Allan Chastanet, Minister of Tourism, St. Lucia
 Hon. Roy Martin, Commissioner of Tourism,
 St. Maarten
 Hon. Bennie Thompson, Member of US Congress

12:00noon - 1:15pm PRESENTATION

Theme - Technological Innovation – A Path to Economic
 Development

Moderator - Colin Ward

- Speakers** Hon. Edolphus Towns, Member of US Congress
 Hon. Eddie Bernice Johnson, Member US Congress
 Commissioner of Technology, St. Maarten

1:30pm – 2:30pm - LUNCHEON

Venue: - Main Ballroom

Theme: - *BUILDING A WINNING STRATEGY - PARTNERSHIPS
 THAT WORK*

- Speakers:** - Hon. Nick Perry, NYS Assembly
 Eric Eve
 Hon. Jesse Jackson, Member US Congress

Keynote Speaker Hon. David Paterson, Governor New York State

3:00pm - 4:00pm

- Round Table #1 - **NEXT GENERATION -
Business Retention and Expansion**
- Speakers - **Sabrina HoSang
Lita Balram
Karlisa Rodney
Hon. Yvette Clarke, Member of US Congress
Hon. Kendrick Meek, Member of US Congress**

- Round Table #2 - **LOCAL BUSINESS INITIATIVES -
Opportunities with US Companies**

- Speakers : - **Ed Goldberg
Eric Eve
Cheryl Monroe
Albert Brown
Member of Congress.**

- Round Table #3 - **HEALTH -
QUALITY HEALTH CARE
HIV/AIDS Programs in the Region**

4:30pm - 6:00pm **TOWN HALL FORUM - EDUCATION**

Speakers: - Dr. Edison O. Jackson
 Dr. Marcia Keize
 Patrick Gaston
 Hon. Sarah Wescot-Williams, Commissioner of
 Education, St. Maarten
 Hon. Danny Davis, Member of US Congress
 Professor Rex Nettleford, UWI

Venue:

6:30:00pm - 7:30pm - *HOST COUNTRY EVENING*

Venue:

Theme

MC:

Speakers:

7:30 - 8:00 pm:

8:00pm - 10:30 pm.

Venue :

Theme

CULTURAL PRESENTATION

Speakers: Hon. David Scott, Member of US Congress

10:00pm - 1:00am

HOSPITALITY AREA

Venue:

Saturday, November 8, 2008

8:00am - 10:00am - **WOMEN'S BREAKFAST**
WOMEN OF INFLUENCE AND POWER

Venue: - Main Ballroom

Moderator - Marilyn Johnson

Speakers: - Hon. Maxine Waters, Member US Congress
Hon. Sheila Jackson-Lee, Member US Congress
Hon. Barbara Lee, Member US Congress
Brenda Scott
Hon. Sarah Wescot-Williams
Rev. Dr. Susan Johnson-Cook

10:15am - 11:45am - **PRESENTATION - EDUCATION**
A Collaboration with US Institution Thinkfinity
UWI/Medgar Evers College Initiatives

Speakers: Dr. Edison Jackson
Patrick Gaston
Hon. Yvette Clarke, Member US Congress
Hon. Danny Davis, Member of Congress

10:15am - 11:45am - PRESENTATION - AGRICULTURE
*A New Emphasis in the Region - Can it Survive
Globalization.*

Chair & Greetings:

Speakers: Hon. David Scott, Member US Congress
Hon. Gregory Meeks, Member US Congress

11:00am - 1:00pm All Members of Congress are requested to attend
Closed Door Meeting with Prime Ministers,
Ministers of Government of the Caribbean,
Commissioners, to review US/Caribbean Relations

12:00noon - 1:15pm - PRESENTATION - CREATIVE FINANCIAL SOLUTIONS
TRADE & INVESTMENT
Retooling for Growth
Community Capitalism

Speakers: - Hon. Maxine Waters, Member US Congress

Panelists:

12:00 noon - 1:15pm - PRESENTATION
Theme *Hemispheric Security - Ports/Airports -
Crime - Drugs - Disaster*

- Speakers**
- Hon. Bennie Thompson, Member of US Congress
 - Theo Heyliger – Commissioner of Ports, St. Maarten
 - Hon. Yvette Clarke – Member US Congress
 - Hon. Lance Oglete, Brooklyn District Attorney
 - Dr. Basil Wilson
 - Hon. Keith Ellison, Member of US Congress

1:30pm – 2:30 pm LUNCHEON

Theme: CARIBBEAN – A SOLID INVESTMENT

- Speakers**
- Hon. Charles Rangel, Member of US Congress
 - Hon. William Thompson, NYC Comptroller
 - Dr. Compton Bourne, President CDB
 - Dr Enrique Riggs
 - Javier Evans

Round Table #1 - EDUCATION

- Speakers**
- Hon. Danny Davis, Member of US Congress
 - Hon. Eddie Bernice Johnson, Member US Congress

Round Table#2: - **IMMIGRATION**
Hon. Sheila Jackson-Lee, Member of US Congress
Dr. Marco Mason

Round Table#3: - **HAITI - HOPE II - Diaspora Initiatives**
Hon. Charles Rangel, Member of US Congress
Hon. Kendrick Meek, Member of US Congress

Round Table# 4 - **MICRO FINANCING - CONFERENCE GENERATED**
Laura Blackburne
Hon. Keith Ellison, Member of US Congress
Lucille McEwen
Michael Flarigan

4:30 pm - 6:00pm - **TOWN HALL FORUM - TECHNOLOGY**

Venue:

Speakers - Marie Long
Marilyn Johnson
Colin Ward
Al Brown

Hon. Corrine Brown, Member of Congress

Hon. James Clyburn, Member of Congress

Commissioner on Technology

6:30 - 7:30pm - GALA RECEPTION

Speakers - Hon. James Clyburn, Member of US. Congress

7:30pm - 10:00pm - GALA DINNER & AWARDS PRESENTATION

Speaker - Hon. Charles Rangel, Member of US Congress

Hon. Sarah Wescot-Williams, Leader of Government
Business

AWARDS PRESENTATION

ENTERTAINMENT

10:30pm - 1:00am - HOSPITALITY AREA

Venue:

Sunday, November 9, 2008

8:30 am - 10:00am POWER BREAKFAST

Theme: - *SPIRITUALITY - THE BASICS IN BUSINESS*

Speakers - Rev. Susan Johnson Cook
Ed Goldberg
Lowell Hawthorne

Selection: - Local Choir

September 30, 2008

Exhibit 2

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended.

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re: Representative Carolyn Kilpatrick
Review #: 09-2567; 09-4403; 09-3698; 09-6333; 09-2222
Date: May 14, 2009
Location: Rayburn HOB 264
Time: 12:15pm to 1:00 p.m. (approximately)
Participants: Leo Wise
Omar Ashmawy

Summary: Representative Carolyn Kilpatrick is a Member of the United States House of Representatives and represents the Thirteenth District of Michigan. She was interviewed pursuant to Review 09-2567; 09-4403; 09-3698; 09-6333; and 09-2222. We requested an interview with Representative Kilpatrick and she consented to an interview. Representative Kilpatrick made the following statements in response to our questioning:

1. Representative Kilpatrick was given an 18 U.S.C. § 1001 warning and consented to an interview. Representative Kilpatrick signed a written acknowledgement of the warning. [attached]
2. Representative Kilpatrick confirmed that she attended the November 2008 13th Annual Caribbean Multinational Business Conference in St. Maarten. She did not specifically recall the dates she attended, but stated that whatever dates were on the disclosure forms were the dates she travelled. While attending the conference she stayed at whatever housing was provided by the conference.
3. Representative Kilpatrick's daughter and granddaughter also travelled with the Member. Her grandchild was approximately 7-8 months old at the time and did not need a ticket to travel as she sat on her mother's lap during the flight. All three individuals stayed in the same room. Representative Kilpatrick described the room as a small suite with a bedroom and front room. She was shown a copy of the online registration form used to

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make her reservation. [attached] She stated that she may have seen the form before, but if she had not seen it then she would have told the staff what she wanted and they would have made her travel and lodging plans accordingly.

4. Representative Kilpatrick was invited to the conference by the Carib News Foundation. She has known Karl and Faye Rodney for about 6-8 years and receives a subscription to the Carib News newspaper. As a member of the Foreign Operations Committee she is interested in going to the conference. Attending the conference is also one of the best ways to get to know other Members of Congress. Representative Kilpatrick has attended the conference at least 3 or 4 times previously. Each year, Representative Kilpatrick looks for the invitation to the conference.
5. Other than at the annual Caribbean Multinational Business Conferences, the Member does not generally have contact with the Rodneys. However, a few months ago she saw Mrs. Faye Rodney at a meeting of the National Newspaper Association.
6. While at the November 2008 conference, Representative Kilpatrick attended a number of workshops and most of the sessions. She specifically recalled the session on health and the fact that Delegate Christensen participated in that session. There was one evening when she did not attend the conference and instead spent it with her grandchild, but otherwise she attended most of the conference.
7. Representative Kilpatrick attended the opening ceremonies and was invited to make remarks. The Member assumed that she was invited to speak because she was the chair of the Congressional Black Caucus at the time. Typically if the chairperson of the caucus does not speak, then the senior Member of Congress attending the conference offers remarks at the opening ceremony.
8. Representative Kilpatrick specifically recalled the greeting from Michael Flannigan because she was impressed by him.
9. Regarding the closed door session with Members of Congress, Representative Kilpatrick did not remember what was discussed. She stated that it was between 1-2 hours long and was just between the Members and officials in the local St. Maarten government. She presumed that the topics of the meeting were trade, partnerships, exports and imports and similar type issues as those were the kinds of topics typically discussed at such meetings.
10. When asked to explain the references to sponsors in her remarks at the opening of the conference, Representative Kilpatrick stated that she did thank the corporate entities and

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used the word "sponsor," but those corporations were not actually "sponsors," but "partners." The Member stated that she used those words interchangeably.

11. When asked about the roles of the corporate entities at the conference, Representative Kilpatrick stated that there were there to interact and that their presence was more a sharing of information. To the Member, the word "sponsor" means "partner," in the same way that the Member was a partner at the conference. She stated that the conference was an exchange of information and an opportunity to build relationships. The Member did not know what the corporate entities did for the conference. She did not know if they provided money or anything else. Representative Kilpatrick remembered seeing signs at the conference with corporate logos on them.
12. When asked about specific comments made by Mr. Flannigan, Representative Kilpatrick stated that she did not remember him speaking and that she would not know him if he walked into the room. She also stated that she did not remember what Mr. Flannigan said in his remarks at the conference.
13. Representative Kilpatrick said that she may have attended the ribbon cutting ceremony at the conference, but did not remember. She was then shown a picture taken at the ribbon cutting ceremony [attached] and she identified herself in the picture. She also identified the person next to her (to the right of her in the photograph) as the Leader of Government of St. Maarten.
14. When asked about the role of the Carib News Foundation in the conference, Representative Kilpatrick stated that the foundation was the leader, presenter, and organizer of the conference. Mr. Rodney always opens the conference, but she did not remember his specific remarks at the 2008 conference or if he spoke before the Member spoke.
15. When asked about the role of the government of St. Maarten in the conference, Representative Kilpatrick stated she did not know. She stated that she probably saw the invitation letter from the Head of Government of St. Maarten, but did not remember it. She did not know if St. Maarten was identified as the host of the conference. Representative Kilpatrick was shown the invitation [attached] addressed to her from the government of St. Maarten. She stated that although her name was on it, she did not remember it. She must have seen it as it would have been in her file, but she had no recollection.

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16. The Carib News Foundation paid for her travel and her hotel. Representative Kilpatrick did not know if she had seen all the documents submitted to the Standards Committee regarding this trip, but she stated that she signs all her forms so she probably saw the documents, but she did not have any recollection of seeing them. She did see the post-travel disclosure form for the trip and she signed it. The post-travel disclosure form was shown to Representative Kilpatrick. [attached] She identified her signature. She stated that she would not have signed it if it was not accurate. When asked how she knew it was accurate, the Member stated that she knew it was accurate because "we checked the numbers" and she "would not sign it if it weren't."
17. Representative Kilpatrick stated that she ate breakfast, lunch, and dinner at the conference. She did not know how the meals were paid for.
18. Representative Kilpatrick said that she had spoken with other Members about the conference since attending it. Specifically she has spoken off and on with the other Members who attended the conference about the Office of Congressional Ethics' Review. She stated it was "our position" that the Standards Committee said it was ok and therefore it was ok. The Standards Committee was the "Bible around here" and "we treat it like the Bible." The trip was approved by the Committee and so she was not concerned by the corporate logos at the conference.
19. Representative Kilpatrick was again shown the post-travel disclosure form relating to this Review and asked if the dollar amounts for transportation were checked against the actual ticket. The Member did not know. She stated that she thought that the Standards Committee and the Carib News Foundation would do it.
20. The Member was shown a copy of the paper ticket she used to travel to the conference and confirmed that it was a copy of her ticket. She stated that she may have seen an itinerary but did not remember. It was common practice for her staff to give her an itinerary, but she had no recollection of seeing one.

I prepared this Memorandum of Interview on May 18, 2009 after interviewing Representative Kilpatrick on May 14, 2009. I certify that this memorandum contains all pertinent matter discussed with Representative Kilpatrick on May 14, 2009.

Omar Ashmawy
Investigative Counsel

Exhibit 3

TRANSCRIPT OF AUDIO FILE:

11-7 AM SESSION - FIRST 30 MIN

Thank you for working with Accentance for your transcription needs. The text below represents a professional transcriptionist's understanding of the words spoken. No guarantee of complete accuracy is expressed or implied, particularly regarding spellings of names and other unfamiliar or hard-to-hear words and phrases. "(ph)" or "(sp?)" indicate phonetics or best guesses. To verify important quotes, we recommend listening to the corresponding audio. Timestamps throughout the transcript facilitate locating the desired quote, using software such as Windows Media or QuickTime players.

BEGIN TRANSCRIPT:

KARL RODNEY: ...Mike Flanigan how through the year his division has been supportive of the Mission and the Conference. And so we want to say thanks to Citi. You'll be hearing from Mike later but it's a great team to have working and great partners. We have Pfizer and a big supporter of (inaudible) aspect. Karen Boykin-Towns is not here, she has been able to in the past eight years and there's a death in her family and so she's not here to begin. Through the years work had done in the Caribbean circle in the United States and then a special touch to our work that can be done not only on the delivery of health care but overall awareness. [0:01:00.4]

And over from Macy's and its very fine team has been innovative in outreach to various locations we've gone to, finding new vendors, developing new contacts and really helping to make the conference a success by engagement of our local participants. So Ed and Brenda are tremendous supporters and we're so delighted that they're here with us.

IBM and Marilyn Johnson, Marilyn is Vice-President of Market Development, responsible for strategic marketing for Black, Asian and Hispanic, Native American and Women. Marilyn's a dynamic partner and you'll be hearing from Marilyn also. You should be alerted that between Brenda and Marilyn tomorrow is Women's sessions is going to be something to talk about. [0:02:09.5]

Marie Long is here from ATT but ATT has supported the Conference all 13 years. We started with them. They made sure that the Vision, the Mission of the Conference is supported through the many years.

We have with us Mr. Pat Gaston. Mr. Gaston is the President of Verizon Foundation, one of the largest private foundations in the United States. And Mr. Gaston has made his mark in moving that foundation to be a force in education in the United States. We are delighted he is here to be with us and to introduce a wonderful program that has been very effective in the United States (inaudible) to see if there is potential here in the Caribbean. So, Patrick, we are delighted you are here and we look forward to your presentation. [0:03:14.9]

Preferred Health and a wonderful group of doctors, Dr. Valdez, Dr. Carl Kenel-Pierre, Dr. Kernisant, a group of doctors who have a network of centers through the United States but they also see and want to have that expanded to the Caribbean and also to bring a new kind of emphasis with respect to health tourism to the Caribbean and so they're here today also.

Dale Morris from American. American has been a partner with us for several years. Dale is expected to come in later on today but we want to acknowledge American and want to say "thanks".

Lloyd Williams from the Harlem Chamber of Commerce enough of his members are around and Lloyd has been supportive of this Conference from its inception and the Chamber has always been here with us and so we want to say "thanks" to Lloyd. [0:04:20.9]

Medgar Evers College under the dynamic leadership of President Edison O. Jackson has not only brought to the Caribbean a new vision of education, a new initiative with respect to men and empowerment but also the team that you see moving around they're from Medgar through the instrumentality of President Jackson working with us to document the Conference. It will be available too for a widespread distribution afterwards. So Medgar has been a true partner in making this Conference and this Mission work. [0:05:07.0]

Turner Construction. we have had a working relationship with Rev. Hilton Smith, he has attended several conferences and now he's with his colleague John Pierce to be a partner in the Mission of the Conference.

And, of course, the government of St. Maarten's under the dynamic leadership of leader Sarah Westcott-Williams and her dynamic team. We have always been working with - we always work with the leader and her dynamic group and we are just delighted at her own creative vision, her own determination and dynamic way of dealing with the Mission and dealing with the situation at hand. And we met with Commissioner Westcott-Williams and her team and she had a vision to suggest the theme of the Conference, time of transition, stretching for change and building the land session. So it was with that kind of background that we're here and to St. Maarten's we say, "Thank you very, very much." [0:06:31.4]

We have so many great partners that we shall hear from throughout the morning. We have through the Conventional Black Caucus and their members a set of agendas that have been accomplished, policies that have been achieved and programs that have been enhanced. And through the years they have been very effective when they have attended the Conferences our own (inaudible).

It was here at St. Maarten's six years ago that a group of hoteliers and vendors approached the members of our caucus to suggest that the Caribbean had been treated unfairly with respect to the duty-free allowance going into the United States. And it was within six months that it was changed through the effort of the members of the Black Caucus and so the Caribbean is better. And the Caribbean has benefited through millions of dollars of duty-free items that you know come through to the Caribbean.

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It was also here in St. Maarten's that the issue of tax exemption for conferences held in the Caribbean was again brought to the attention of the members of the Congressional Black Caucus and again that was achieved within a year. [0:08:08.2]

And so we've seen that kind of work constantly throw it's really the conference. So we can try to serve real achievement in fact in this room there is a couple that came from Denver to Barbados for their first Conference and they have built a region wide distribution for ice cream and fast food. And this has grown considerably.

It was also through the Conference that a small technology company with the value of \$2 million came, got a contract and that company in two years became a \$12 million company. And we've seen that kind of connection throughout the Conference. We could point to Barbados where technology was enhanced with respect to ATT work with the local Barbadian telecommunication company. St. Croix the fiber optics center, Grenada an oil refinery, all coming up with the expertise of the Conference to the (inaudible). [0:09:30.7]

And so the Mission is there to continue, the Mission is there to enhance, the Mission is there for us to make it work particularly now when we see the change has come and we can now come together to pad the agenda and to look forward to this kind of strategy for change. And so we want to welcome you. We promise that our sessions are going to be interesting. We have some of the best speakers that you can find on the various topics. We're going to see more when we get together the support we can bring to each other. The support we can provide with respect to the met work and certainly when we go back in the Caribbean we can really see results. We can come together as a people. You've been a great Conference. Thanks so much for being here. God bless. [0:10:28.4]

REV. DR. SUZAN JOHNSON-COOK: Thank you Mr. Rodney and we also thank you Mrs. Rodney as well. With interest we're here on the wave of the man who campaigned about change and on this transition to change and also strategic alliances. And we hope that will happen for you while you're here. Mr. Vide mentioned all of the sponsors who were with us and the partners who helped to make this happen and we're going to hear from three of them at this time at this quarter, Michael Flanigan from Citibank (Citi) and Ed Goldberg, Senior Vice-President at Macy's and Community for the Relations, and Patrick Gaston the President of the Verizon Foundation. In that order we will receive them this morning as they come, please. (clapping) [0:11:15.6]

MICHAEL FLANIGAN: Good morning.

ALL: Good morning.

MICHAEL FLANIGAN: It's really a pleasure to be here. As you heard before, Eric is on his way so I have the great privilege and honor of putting in for Eric. But first just wanted to say "thank you" and again welcome to the 13th Annual Caribbean Business Conference. This year was significant for Citi. For the first time we are the lead sponsor of this premier event. But I would be remiss in not thanking the organizers and our hosts here at St. Maarten so to the

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government, to the Commissioner Sarah Westcott-Williams, Governor Franklin Richards and Commissioner Roy Marlin and all the other elected officials here in St. Maarten and elected Congress members, appointed officials from the United States it's a pleasure to be here with you. [0:12:15.6]

We also of course have to thank the Rodney's as being 13 years in ensuring that this vision is carried out and delivered all across the Caribbean and I don't call to talk about some successes but I think one of the most important success that I think that I've experienced in coming to the Conference for the last six or seven years is just reunited with his great family. It's all about developing our communities. About we're all about the same thing, I think. We're all on the same page. We're all about the same agenda. And we're all about making sure that we absolutely care about each other, yourself but we care about the broader community. So it's always a pleasure to be here. I get re-energized every time I come. And so it's - I look forward to it - so it's one conference that I will never miss.

This Conference is an important gallery that makes a tangible contribution to dialog on the issues of important to communities. From recognizing the untapped wealth for underserved communities to building property alliances so that together we can build healthy, robust, organic economies. Today and tomorrow and even into Sunday are very important to that conversation at least to building a winning strategy to succeed in these turbulent economic times. I trust that we will all take full advantage of the great minds and the leaders that we are privileged to spend time with. I know my Citi bank black (inaudible) are ready. Thank you so much for having us here at Conference. (clapping) [0:13:58.2]

ED GOLDBERG: Good morning everyone.

ALL: Good morning.

ED GOLDBERG: As Mike said it's really a pleasure to be back with family today. We look forward to this Conference very year. Obviously, we hope that there will be many, many more over the years to come. I learned something from David Dinkins several years ago when you have a whole list of dignitaries in the house, the best thing to say is, "Present, protocol observed." So, Mr. Mayor, thank you for those kind words. (laughter)

Now a week and a half ago, Macy's celebrated its 150th anniversary. (clapping) When you think about anniversaries of companies today to believe that somebody could be around in the retail industry in particular for 150 years is quite an amazing feat. I'm sure that when R. H. Macy opened his store in lower Manhattan on 14th Street on October 28, 1858, he did not have the vision that the company some day; number one would last for 150 years; or that it would employ 225,000 people; or that they would do \$27 billion a year in business; or for being in 46 of our 50 states; and also the opportunity of having a business in 64 or 65 major markets in the United States. [0:15:30.9]

But today I'm hear to talk more about the Caribbean contract. The fact that we have been supportive of Carolyn Fay and this particular venture for the number of years but more importantly the fact that we come here to look for that spark that will ignite an opportunity to

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find that next Martha Stewart; that next design; or that new product that's going to sell in our stores such as we've done with the Rwandan peace baskets and products like that. And I think it is really why our Mission is so important, it's not just a question of change, not just a question of transition but it's building those ties and looking for those opportunities. That I think will bring us closer together. [0:16:15,9]

There's no question that we all face difficult times but I believe that the Caribbean is our backdoor and the bottom line in opening for us for expansion. No, I don't think we can build 250,000 sq. ft. mall stores but Macy's has to learn in transition how do we conduct business in the Caribbean communities. And I think we're going to find that way and obviously this particular convention is one of those opportunities to do so.

You all know Brenda Scott, my wife, (laughter), Judy's back in the room sleeping so I can say that. But Brenda and I have been together for more than 20 years. We have obviously been very much involved in our communities where we do business and we still believe we have a long way to go. But our mission is being supported by a great Chairman, Terry Lundgren, and the people of Macy's, so obviously we look forward to developing these bridges and developing the relationships. And I hope that in the not too distant future, we will be talking about a Macy's store here in the Caribbean. So enjoy your convention. I hope I'll get a chance to talk to each and every one of you as the time goes by over the next couple of days. And again, thank you so much, Carolyn Fay for the great work that you do. (clapping) [0:17:32,9]

PATRICK GASTON: Good morning everyone.

ALL.: Good morning.

PATRICK GASTON: Thank you, Karl, for the wonderful introduction. Thank you, Michael and Ed for these great remarks. I extend welcome from our CEO, Ivan Seidenberg, and our 225,000 employees, many of whom are from the Caribbean region including me. I want to acknowledge my colleagues and members of the public sector, members of the community, and I also, I guess, want to respect present protocol. Okay, but I have to single out a couple people, right? So thank you to the leader of government Sarah Westcott-Williams for hosting us today and the great people of St. Maarten. It's a delight to be back here. This is my eighth time in St. Maarten and I may stay. (laughter) It's wonderful. I want to acknowledge Karl Rodney for his exceptional ability to bring people together to recognize the collaborations that are important for business development. He does so with the grace that I admire and it's the first time I've had the chance to be here with you, Karl, and it's an honor to be here and a privilege so thank you for inviting me. [0:19:06,0]

I want you all to recognize Rex Nettlesford. I don't know if he's in the audience still. But Rex and I have known each other for about nine years when I first joined the Foundation of the University of West Indies Board of Directors. And one of the things that attracted me to the University in addition to Karl, of course, was that Rex was the kind of leader that reflected a lot of commitment and enthusiasm about education; something that I care deeply about. And over the years has provided me with his counsel and friendship and I thank you for that, Rex. (clapping)

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You know, Verizon does not have a retail presence in the Caribbean and I hope some day we will. But we do provide global Internet networks that help to provide a lot of communications that you might experience here. So I think we're in the game and we realize the value of technology to ensure that folks have access to incubation and education. In my case at the Verizon Foundation, Karl mentioned that I head up the Verizon Foundation and our emphasis is on education. And what we're trying to do is deliver resources to teachers in the classroom that need it really badly. So we're developing contact and we're taking with our partners, we're taking that contact and making it available through our technology platforms so during the course of today in the discussions that we'll have, we'll talk about that resource. Which, by the way, is offered free of charge to teachers around this country and now around the globe, so we want to make sure that we present this resource as another thing that this community can use and use it in a way that's free. So I'm looking forward to this dialogue and am excited about this Conference and I thank you very much, Karl, for inviting us to hear quality. [0:21:06.2] (clapping)

REV. DR. SUZAN JOHNSON-COOK: Thank you very much. I loved language in school. I remember otomottopea and phizz and those words and oxymoron, best of times, worst of times, homonyms, the words that sounded alike with different meanings but synonyms when you said the word you could understand what it meant. It was synonymous with something. So when we say the words, "front line", "civic leader", "activist", "Miss NAACP", "world leader", "you don't want to mess with her", you know it is synonymous with Hazel Dukes and we want to hear from her, our God, mother, our community, don't you think I'm right? (clapping) Miss NAACP, Miss Leader, our dignitary, let us receive this morning, the Honorable Hazel Dukes of New York City. Are there any New Yorkers in the house? (clapping) Let's get a little noise over here. All right.

HAZEL DUKES: Good morning.

ALL: Good morning.

HAZEL DUKES: This is my 12th Conference. Missed only one because I had a broken ankle and it was just like four weeks before the Conference, not even, be on the cast. But let me say to Fay and Karl that they have been the glue without the (inaudible). They are for us 24-7. Not only just in New York City but the Islands we have attempted. The NAACP will be celebrating its 100th anniversary in New York City where it was founded July 14 through July 17. Medgar Evers, the college, the university, the (inaudible) of the city of New York, when George Blackburn and I sit and watch TV and we hear all people go over their history, people forgot that it would not have been possible if it was not for those names, Medgar names known or so many others in Alabama for Rosie, decided to sit. So Maude could stand. Maude could not have stood if Rosie hadn't of sat. Rosie was the Secretary of the NAACP, the National Association for the Advancement of Colored People. The Colored People come in all colors, when you make your beautiful salad you just don't want all greenery in it. Even with your omelet this morning you could have a mixture, of beautiful flowers I have to have all colors. And so for a hundred years this old ship resigned, been around. Lord, I was reminiscing last night about the people who we went to the court, there was only six. We used to be at the Hilton Hotel. And we held court. When we started in Albany there was no black and Puerto Rican caucus, there was the

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now, the next mayor for the city of New York, Bill Thompson's father, who was the regional director for the NAACP who went on to be now retired. [0:24:54.4]

It would not have been 106 mayor of New York City of Percy's son, a former President of the New York City branch of the NAACP, Balford Calison (sp), Secretary of State and now the government of the state of New York has his first job at the NAACP. So I want us to learn history so we can have our brothers and sisters in (inaudible) and those who are coming to the shore of these United States to understand the kitchen of our connectiveness to (inaudible). How soon you could forget the history that those from the Caribbean have played to make America what she is today. [0:25:44.8]

And so I join with Karl and Fay every year I trek here because they joined with me in New York City trying to break the (inaudible) of the two communities because Rolly Johnson said this morning, Cook said this morning, Johnson Cook said this morning. "When we join hands together, when we come and talk about the multi national conference, we're global now, we can't think we just in Brooklyn, we just can't think we in the Bronx, we just can't think we in Manhattan and in Queens and Staten Island. We are all over this country. And when we saw the crowd of people, black and white, Jew and Gentile, Muslim, Asians, all across this country who came out for Obama, it is a change in America. And then we African-Americans and the Caribbean's have to absolutely solidify our tie. Because if America is to be what she was born to be, it would be that so on behalf of our new President Ben Judds who I'll promise will be here next year, 35-year-old Rhodes scholar, ingratiating young brother who is so excited where we are going. And my sisters in the (inaudible) and my brothers, we going to get it together. As our Congresswoman told us yesterday. "We're tired of talking about it. It's (audible) we are sick and tired of being the sick and tired." And so when we leave here, we will be better off because we came together to make new friendships, to re-energize and I would say to Karl and to Fay, our sincere gratitude to you for bringing us together as a family each year. Some of us even don't have enough time to sit. That's why Laura convinced me to come a day early. Even if I don't know what's happening with my 401K (laughter) I'm nervous, Mr. Comptroller man. I don't know about vacation but we thought it not right not to come here and be with our family. Thank you so much. [0:28:13.4] (clapping)

REV. DR. SUZAN JOHNSON-COOK: We thank you so, so much. He began his second term in January 2006 as the 42nd Comptroller of the City of New York. He's come from a distinguished parenthood, a famous judge and a mother as a public school teacher, but he has distinguished his own path. And he has become a wonderful Comptroller of New York City and he has responsibility for all the city's pension funds. He's just a good brother. He's here with us today, hope to be the next mayor of the city of New York. Let's put our hands together for William C. Thompson, Jr., the Comptroller of a great city of New York, New York. All right?

WILLIAM THOMPSON: Thank you Reverend for that very wonderful introduction and it's good to see you here as our Master, or Mistress of Ceremonies, this morning. And I go ahead and make a mistake. I should have had the Mayor open up for me because he always does it correctly. But to our leader of government, Commissioner Westcott-Williams, to the members of government here in St. Maarten, my colleagues in government all over the United States, friends, good morning.

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ALL: Good morning.

WILLIAM THOMPSON: It is definitely a pleasure to be back again even though following Hazel to the microphone is always an indubitable thing to do. [0:30:01.1]

END PART 1

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TRANSCRIPT OF AUDIO FILE:

11-7AM SESSION - 30 THRU 75 MIN

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BEGIN TRANSCRIPT:

(Part 2 - beginning at 30:00 through 1:15)

WILLIAM C. THOMPSON, JR.: - It's good to be back again and let me first start out by thanking, and I always term them as I did last year and I have continued to do it over a period of time, termed them the "dynamic duo," Faye and Karl Rodney. [applause at 0:30:16.7] They happen to be, when it comes to vision - and that's exactly 13 years ago when putting this conference together, they had a vision. It is something that they have never taken a step back from. They continue to move forward they continue to bring us together. And while we have the opportunity to meet, to have conferences in some wonderful places, just fabulous environments and that is the truth, but they work as, okay - Karl and Faye let us understand that we may meet in a wonderful environment, you walk outside and it's gorgeous, but we are here to accomplish things. [0:30:58.7]

Karl mentioned when we were here before, and I remember the discussions with the members of the government who had told me that the (inaudible) \$200 dollar duty-free or the amount that you could bring in the country hadn't changed in decades, in years and years and years. And I remember that members of the Congress would tell me that they would go to Washington and they would go back to Washington and in a period of months the amount had doubled from \$200 to \$400 dollars. It was the right thing to do but you saw the power of this Congress. As I said, we might come together in wonderful places, but it is about business. It is about increasing the ties. It is about the business between the Caribbean and the United States and increasing those business opportunities, helping to raise the standard of living for many; helping to build businesses and institutions, that's what it is about. [0:32:09.3]

Last year, Karl had me down here and - no I'm sorry, last year after our conference I worked. I must admit, Karl had me as a luncheon speaker, we were outside, it was about 85 degrees and I was in a tie okay, I was in a suit and tie and it took me a couple of hours afterwards to dry out. But the one point that was made then was Karl looked at me, and those of you who know me in the

introduction as New York City's Controller, I'm a member, a trustee of four of our five pension boards, chief investment advisor to all five. Our total assets in knowing, it might have shrunk a little, but our total assets are about \$95 billion dollars right now. We are the fifth largest public pension fund in America. [applause at 0:33:02.4] At that point Karl looked at me and said, by the way how much of that is invested in the Caribbean basin? How much of that money is going to create, to build infrastructure, to help with tourism, healthcare and other things? And it was an impressive question and I went back and the answer was not much. Not much, so we started to go at that point down the path of looking at investment possibilities in the Caribbean basin; obviously a very promising area. [0:33:42.0]

To go back to quote just a couple of numbers as we would look at - now it has been a tumultuous year on Wall Street, at the same point, many of the investments, as we were termed that we have made in the emerging markets around the world, have outperformed developed markets. For instance, one year, three year, five year performance of emerging market equities has been on par or better than the United States private equity, the United States venture capital, Western European private equity and U.S. public markets. Clearly it makes sense for institutional investors to begin to move further into those waters of emerging markets. [applause at 0:34:25.8]

So we went back and started to engage, particularly we looked at private equity, and the way we invest usually isn't directly it is in private equity funds, so we began and our private equity consultant, we asked them to take an initial look at the Caribbean basin for how much initially should we be investing. And the number that they came back with was \$80 million dollars. That would be our first step into investment in the Caribbean basin through a variety of investment vehicles. We started to move down that path and unless I am wrong, and if I am I will be short a few people or I will lose a few people in my investment side, but I believe that yesterday back in the office, back in front of one of our pension boards, we approved the first application of \$30 million dollars to be invested in the Caribbean basin. [applause at 0:35:25.8] And, we are going to continue to move forward through other investment vehicles to invest and commit, or really to commit and invest, the additional \$50 million dollars and then we will take a step back and look for other possibilities. [0:35:46.8]

So I just wanted those to know that conversation, that investment of money, and as I pointed out it will range in everything from real estate to infrastructure, industries ranging from healthcare, financial services, energy, telecom, tourism and other areas, but that started last year at this conference. [applause at 0:36:09.8] So to those who say, "Jeeze you are going to St. Maarten? I have a wonderful time, I know you are going to spend a lot of time on the beach." Karl and Faye make sure that we are working hard and that we are getting things done. [0:36:28.6]

And at this conference, while it is great to see friends and colleagues and some people I don't get to see for a year, we are here working and we are here making sure that we increase and bring closer those ties that we have had in the past and that we are helping to grow business, that we are helping to improve quality of life both here in the Caribbean and back in the United States.

So again, it is a pleasure and let me say again to Karl and Faye, thank you so much for the leadership that you have shown. We look forward to your continued leadership for years to come. Thank you so much. [applause at 0:37:04.2]

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REV. DR. SUZAN JOHNSON-COOK: Thank you for working hard while you are here and even back at home. Thank you. It is so good to be together. We do get to sit down and talk to each other here. We try to get on each other's calendars in the City and we never do, but here we are able to make and transact business and it's wonderful.

As a point of personal privilege, it is not everyday that you have a city world leader that you know very well is a man of faith first of all, who reads the Holy Scripture at your wedding. It's not everyday that you go into (inaudible) flavor at a press conference that he has called and then he comes to the hospital to see the birth of your first child. It's not everyday that you have someone who is there at the blessing of that child who's named after him. It's not everyday that you have someone who hosts Whitehouse Fellows when they run, coming to New York City and gives them the key to New York. And, it's not everyday that we have the first African American Mayor of the City of New York in our midst. We are in the midst of history here. He was the 106th Mayor for the City, but he is our number one Mayor, the Honorable Mayor David Dinkins. Professor in the Practice of Public Affairs at Columbia University [applause at 0:58:16.8], and our wonderful, wonderful leader who's shoulders we stand on and for who we cheer for in honor this day. Let's hear it for the Honorable David Dinkins. [0:38:28.4]

DAVID DINKINS: Well one thing is clear, if I had had the good fortune of having the Reverend introduce me more often I might have gotten re-elected. [laughter at 0:38:48.4] I am delighted to be here, but I want to clear one thing up from the start. I think it should be acknowledged that Faye Rodney has been such a wonderful person and to think that she permits her husband to come along with her the way he does [laughter at 0:39:10.1]. It's really nice. She even lets him think he's in charge every now and then. [laughter at 0:39:16.6] But they are a dynamic duo.

I am delighted to be here with you, I truly am and each year. I guess I've been here ten out of - at least ten times I think - and each year I try to get myself on the committee that will go and do the, make the decisions on where we are going to go next year so I can visit the islands but they have not yet let me come. But each year though, I insist that the tennis facilities be adequate, but I am not playing this time. But I want you to know my friends (inaudible) that they were out on the court this morning and I will get a report and it better be good. [laughter at 0:40:14.3]

I am delighted to be here with you, I truly am and we are taking a role and those folks who are not here now, but are still having breakfast or are out on the beach, we've got their names; [laughter at 0:40:33.0] and we are going to chastise them severely. But it really is a wonderful, wonderful opportunity to come together with friends. For me personally it gives me an opportunity to say thank you to so many of you who helped me become the 106th Mayor of New York. [0:40:51.2]

We say often that everybody stands on somebody's shoulders, and by that we mean Malcolm X and Martin Luther King and (inaudible) and Harriet Tubman and Rosa Parks and for me, for me personally, it also means Percy Ellis Sutton. [applause at 0:41:13.0] who ran in 1977 with such class and distinction that nobody laughed at me when I dared try in 1989. And we were successful and it is a broad leap. [0:41:33.6]

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Certainly, I was simply privileged to be the stand bearer, but it was many of you here gathered, many of you who worked with me, worked with me in our administration like Laura and Hazel and so many of you, and I know that we wouldn't have gotten nothing done had it not been for the man called the Rumble Genius by the New York Times, Bill Lynch. [0:42:02.3]

Bill used to say, good government is good politics. And you will note on his literature, he's got a consulting firm now and a whole heap of clients and is doing very, very well, you will note that he uses that slogan and it is certainly true. If you do that which is right in the first instance, it will inure to your benefit politically as well. [0:42:34.5]

So we didn't make judgments politically and then say well let's see how that will play out, we did it the other way around. We did what we thought was right and then it inured to our political benefit and I am so proud of so many of the people who helped us succeed as they go forth now. And I can't believe how young they were, some of them are still young even now and maybe it's because I am so old that it looks that way. But it really is an example of what can happen when good people come together and work hard. [0:43:11.7]

And I know that President-elect Obama is going to do well because he is going to surround himself with bright, intelligent, trustworthy people on whom he can rely on. Because no executive, no executive, not even Ed Goldberg, can get it done alone. You've got to have help and you've got to have people to whom you can delegate and you have to have people who will make a triage. You can't look at the thousands upon thousands of things that will come before you. They have to do a triage and bring to you those that they deem to be of significance for you to make a judgment, and then you will make a decision among them. [0:44:00.6]

I am confident that President-elect Obama will make the correct decision once he knows all the options, but he can't know all of the options if they aren't brought to him in the first instance. And the reason that I have such faith that he will be surrounded by good, bright people is the kind of campaign he ran. [applause at 0:44:26.1] He ran one hell of a campaign so it sort of suggests that he will do as well as our President. That is not easily done, particularly in these difficult times, but when Alan Greenspan said, "By God I didn't know it was this bad," or, never (inaudible) how the hell he doesn't know, how am I supposed to know." So it is difficult for sure, but we are going to survive this. They say that that doesn't kill you makes you stronger, so we are going to survive this. [0:45:01.0]

Ed Goldberg made reference to my custom, my habit that I got from African diplomats of instead of acknowledging everyone in the audience, which I would want to do and my staff would go absolutely crazy because I would acknowledge all of my friends and they - I did that once and my wife was standing right next to me and I acknowledged everybody in the house except her. Hell of a ride home [laughter at 0:45:29.6]. But, the African diplomats have this custom, they say, "Usual protocols observed." So, President Jackson that means that you have been acknowledged. [laughter at 0:45:45.2] See, that's the way they do it because if you do otherwise, if I go on to describe how Hazel is my assistant and how - let me tell you, you don't want Hazel against you ever, but by God if she is on your side, nothing can stop you; you will win. [applause at 0:46:12.5] And we are all going to turn out as she leaves us in celebration of NAACP's on it's anniversary it is going to be a

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monster, it's going to be a gas to be right in New York and I hope everyone here comes. It is really going to be something. [0:46:34.5]

I say to audiences, the media in particular has been asking me, "Well what's it like for President-elect Obama the first African American President of the United States?" And their theory is they are asking me because I was the first black Mayor and I try to explain that there is a world of difference. While I got to be the head of a city of 8 million plus people and that's terrific, and we have more separate ethnic identities than the United Nations has member nations, so we are truly a magnificent city, but Obama is not only the President of the United States, he is the leader of the free world. So you really can't make a comparison, you can't. Although, I am sure that he's got to feel wonderful because as he said as his grandmother wasn't there at the very end, but fortunately he got to see her, imagine how the family feels, his wife, his children, so I do understand that part and it is a hell of an accomplishment that he has done, but even he could not have done it without you. And he knows that and that is the beauty of it. [0:48:02.8]

I recognize that those of us who have been privileged to serve, it is a privilege and you have to see it that way and recognize it that way and do the best that you can under the circumstances, but never, ever believe that you got there alone, because that's just not true. I am almost amused, I say almost because I feel a little sorry for the distinguished Governor of Alaska, and it's coming out now how they are swallowing in house. I don't know whether you have seen the current press and how they talk about the poor lady and she is trying to defend herself and I almost, underline almost, feel sorry for her, but, she made it up there. [0:48:54.1]

So to my friend, Suzan, the Reverend Doctor Suzan Johnson-Cook, you all - many in this audience knows that she took a congregation of about 11 or 12 people, meeting at lunchtime down near City Hall, and built it into a congregation in excess of 1,000. She did that. [applause at 0:49:25.9] She is a very, very special, gifted woman. And I say that she is here with us at this 13th annual meeting, notwithstanding the loss of her dear brother, my friend, our friend, Charles, very recently. A young man who has gone to his reward and she is with us nonetheless and we appreciate it. [0:49:59.4]

Charles was quite a guy. He didn't like to be called Charlie incidentally; he was Charles. It's sort of like if somebody says they know Joe Hines who's name is Charles J. Hines and they'll say, "Oh, I know Charlie" and you know that they don't know him worth a damn because he is Joe Hines. [0:50:24.2]

So, to be here in the company of Carolyn Kilpatrick, the Representative in the Congress who takes care of our brother Charlie Rangel; that is special. That is special. You know one year we had something like 35 members of the Congressional Black Caucus here, I think it was 35, it was over 30 certainly, and that got the attention of a whole lot of people. It got the attention I'm confident of some sponsors who said well next year maybe we ought to up ours a bit and they did and that's the genius of Paye that she let's Karl come along with her here. [laughter at 0:51:15.3]

It's true that international black heads of states have prevailed in nations with majority black populations, but never before, never, ever in the history of the United States has the Chief of State, the Commander in Chief been other than a white male. And many of us grew up in the days of Jim Crow and dozens of African Americans were still being lynched; 24 in 1933 when I was six years

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old. They were still lynching folks and as a matter of fact I can recall some years later as we started to make (we meaning blacks) started to make some progress, we were told things like. "You Negroes (that's what they called us then) you Negroes shouldn't be so pushy, they only lynched five last year." We were supposed to be grateful that so few of us had died. [0:52:15.2]

Then there came World War II; segregation, as we went off to fight and die for our country. And when I got out of the Marine Corps in 1945-1946 and some of my classmates had shrapnel in their bodies, and we could not go to the movies downtown in Washington, D.C., the Nation's Capital, couldn't shop on F Street if you had to try something on, and this is after the war; the war that ended all wars. So we have come a long way since those days, but things are not perfect even now because I maintain that we live in a racist society that is the legacy of slavery, but that does not mean that we have not made great progress. Imagine a black man, President of the United States of America. [applause at 0:53:20.2]

I can remember when there were certain jobs you couldn't even apply for, couldn't even think about it. We got the right to vote by the 15th Amendment in 1870, but we weren't able to exercise that right to vote until 1965 when the Voting Rights Act was passed. As a matter of fact, if you think back on some of the games made during the Civil Rights Days by Dr. King and so many really heroic women and men. And I have to tell you I ain't to sure that I could have followed John Lewis getting beaten down into the ground and he kept coming back. I'm not sure that I could have done that. [0:54:18.7]

I'm not sure that I could have done what the Tuskegee Airmen did. You know about the Tuskegee Airmen, everybody does, they said blacks weren't intelligent enough to learn to fly. And then B.G. Davis who in four years at West Point nobody ever spoke to him, they didn't talk to him, and he came through all of that and won the fight for black men to learn to fly and then they said, well you can't go into combat because you will be cowards and turn in the face of the enemy. And then they won that battle and they did it so well that people like Roscoe Brown and Lee Archer and Percy Sutton and so many others, they fly in cover for bombers and never lost a single bomber, not one. [applause 0:55:19.1] So much so that the white bomber pilots would ask for them and I can remember, while I wasn't personally there, the black Marines who were trained in Camp Lejeune in North Carolina, white troops went to Parris Island in South Carolina and they thought that the black Marines were somehow not quite as good as the white Marines, but when the black Marines hit the beach carrying ammo for the guys that were pinned down and running out of bullets, they loved them to death. It's funny what need will do; it's funny. [0:56:16.1]

This election has at last put to rest, I think, any doubt that Americans as a whole oppose the failed economic and social policies of the Bush administration, with its record deficits and recession, Billy Thompson knows about that, Phil used to properly regulate financial industries that led to the loss of retirement pensions and the sub-prime mortgage crisis, outsourcing of American jobs, increased unemployment and refusal to work toward a living wage for job offers, failure to support programs that curtail practices that harm the environment and damage or destroy natural resources, failure to end the war in Iraq and approve any meaningful plan to withdraw troops. [0:57:12.3]

Speaking of Iraq, don't it just get you right here when the Bush people lied to Colin Powell and sent him to the United Nations to tell those lies, and didn't it make you feel good when he came out

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for Obama recently; I mean you know [applause at 0:57:38.5] by God, and he is a guy, you know, he is one of our heroes. He truly is, he truly is. [0:57:52.2]

The American people have spoken across the party lines, social classes and racial divide in support of programs to provide affordable and accessible healthcare, to stimulate economic growth and provide a living wage for American workers, to transform energy consumption and reduce American dependence on foreign oil to improve schools by ending No Child Left Behind, and end the war in Iraq and bring the troops home. Some of you will recall that when the troops came home after Vietnam, our country treated them terribly. They spit at them. They didn't ask to go, but they were treated awful. Korea was a little different. And as Charlie Rangle says, he hasn't seen a bad day since. Charlie was pinned down in a foxhole and came out of there with a Purple Heart and Bronze Star and he hasn't seen a bad day since. [0:58:57.2]

But, even though Americans, whether Democrats, Republicans or Independents, have responded overwhelmingly in support of measure that the new President may be compromised I say, at the outset by the actions of the outgoing administration. Keep in mind that he doesn't take office until January 20th and I'm counting on our friends in the Congress to do whatever they can to see to it that he doesn't start off in a hole, because that is what can happen. It is possible: I hope it doesn't happen. [0:59:41.9]

Earlier this year in February of 2008 I participated in a panel at a meeting of the Independent Newspapers International Advisory Board in Cape Town, South Africa on the topic "End of the Bush Era in the United States." And our discussion, neither prophetic or profound, merely reflected the ground swell for change that has this week resulted in one of the most historic moments in American history: the landslide election of the first African American to the Presidency of the United States of America. [1:00:20.7]

The majority of the American public, irrespective of political party affiliation welcomes the end of the Bush administration, by whatever measure we choose to evaluate its impact, domestic and global, this has been a failed presidency that has brought the United States to the brink of disaster and some say beyond the brink. We could recite the long list of offenses perpetrated or orchestrated by that administration that have passed in the name of foreign policy and global economy. [1:00:57.0]

While the United States has now emerged from unprecedented two-year campaigns, some like the New York Times editorial staff have cautioned that we should pay close attention to the efforts underway to perpetrate the policies of the past seven years with Bush. And at the risk of putting a damper on the celebration of Tuesday's victory, I do feel compelled to call attention to a few of the concerns that lay immediately ahead. [1:01:31.7]

True the Congress has a Democratic majority and the political capital of the sitting administration has been all but spent by the wars in Iraq and Afghanistan, and the worst economy since the Great Depression, but even with the lowest approval rating of any president in the history of our country, he has pressed on to do everything possible within his remaining days to compromise the new president, who will take office with the greatest mandate from the people in a century. [1:02:05.6]

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He has abused the political process more than any of his predecessors, undermining the power of Congress through the use of Signing Statements. Over the last seven years he has issued hundreds of these documents, devices showing us that he had no intention of obeying laws, that he has claimed impinged on the constitutional powers of the Chief Executive. Examples of such Signing Statements are those that authorize domestic surveillance without warrants, torture of prisoners in violation of the Geneva Convention, and firing U.S. Attorneys for political reasons. [1:02:50.5]

Others include a host of executive actions designed to impede congressional programs to expand health insurance and prevent further pollution of the environment. The disastrous Bush Lame Duck Budget proposal announced at his last State of the Union Address contained provisions for permanent tax cuts for the wealthy and the highest level of military spending since World War II and reductions in spending for medical research, environmental protection and education. [1:03:26.9]

President Obama will have to contend with this and a series of other eleventh hour measures. We are confident that Congress will reach across the aisle to combat the resultant stranglehold from President Obama's ability and move forward our country. We have a long way to go in repairing the damage done over the past seven years. And although we deserve to relish the moment of victory, we do understand that we have more battles to fight and miles to go before we sleep. [1:04:00.1]

We should congratulate those other political leaders, some of whom are with us here today in St. Maarten, for their election and reelection victories as well. [applause at 1:04:11.2] And as one of these, the Dean of the New York City Delegation of Democrats, my brother Charlie Rangle. And this is a quote from my brother, Charlie says, "The world we look at is a world of many colors, many cultures, many faiths and what we as Americans have to offer is our experience in creating a diverse society as we show the world all of the diversity that is the strength of America. We reflect our values and present an example to the world. With our nation growing international involvement there could be no better time to attract the best and most diverse (inaudible) to represent the American people in every corner of the globe," so says Charlie Rangle. [1:05:05.3]

When we break for lunch we will hear the distinguished Governor of my home state of New York, the Honorable David A. Paterson. He will talk about the importance of building upon the partnerships necessary to translate the watershed victory of democracy in the United States into lasting change. I can't resist remind us that the governor's father, Basil Paterson, once won 61 out of 62 counties in New York State in a Democratic Primary for Lieutenant Governor. And then he joined the of (inaudible) of Goldberg. He was a former United States Secretary of Labor, former United States Supreme Court Justice, former United States United Nations Ambassador, the lousiest damn candidate you ever saw. So Basil did not win, but he would have become the first black Lieutenant Governor of New York State and eyes on the first black governor. So imagine, as I sat in the front row at the state committee meeting and Basil placed David's name in nomination for Lieutenant Governor. I had tears in my eyes. It had come full circle and now that same David is Governor of the State of New York and you will hear from him later. [applause at 1:06:41.3]

Later this afternoon we will meet to share our thoughts and plans for sharing working solutions to education. There are challenges as business and political leaders will be to craft strategies for keeping the doors of the international education open to our future leaders. The world will be a

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dimmer place if we let the lamp of knowledge go out for a generation of our young people. It is within our power to turn up the flame and keep it burning bright, and in the words of President-elect Barack Obama, "Yes we can." [applause at 1:07:24.8]

REP. DR. SUZAN JOHNSON-COOK: Thank you Mr. Mayor, and thank you for looking so wonderful. He's dapper. Amen! Doesn't he look good? [laughter and applause at 1:07:42.4] And Barack Obama stands on your shoulders because you took the blows that shows what a man of faith could do and we thank you for representing us well. [1:07:52.3]

We also are joined by many a (inaudible) joints throughout this conference by many elected officials and some are here this morning: elected officials from the State of New York. You will hear later from the Honorable David Paterson, you heard from our City Controller Honorable William C. Thompson, Jr., Honorable Adolfo Carrion, Jr., President of the Borough of the Bronx; Honorable Nick Perry the Assemblyman for New York State, The Honorable Ruth Hassle-Thompson, State Senator New York State, the Honorable Keith Wright is with us this morning, Assemblyman for the New York State the Honorable Inez Dickens, Council Whip, Member of the New York City Council, and Honorable Dr. Kendall Stewart, Member of the New York City Council. Can we applaud for all of the elected officials from the State of New York? [applause at 1:08:34.3]

And then members of Congress who will be joining us throughout, some of whom you heard last night and today, the Honorable Donald Payne, the Chair of the Subcommittee on Western Hemisphere, the Honorable Bernie Thompson, Chair of Homeland Security, Honorable Donna Christensen, the Honorable Chair of the Subcommittee on National Resources, Honorable Sheila Jackson Lee and now we are also going to hear from one of our Presidents of the Congressional Black Caucus, the Honorable Carolyn Cheeks-Khapark. We are going to the federal level y'all [applause at 1:09:09.6] who is our President, Madam President and will be working with Mr. President would you please come and let us receive her this morning for what a wonderful job you have done and you have served with distinction as well and we celebrate and salute you this morning. Can we applaud the other members of the Congress who are with us? [applause at 1:09:29.1]

REP. CAROLYN CHEEKS-KHAPARK: Giving honor to God who is the head of my life, present protocol being established [laughter at 1:09:46.3], but I've got to say a couple even given that. To Faye and Karl, it's really thoroughly been said but thank you from the bottom of all of our hearts. We could not do this without you, Thank you very, very much. [applause 1:10:00.4] We could (inaudible) every week in our Washington offices, but that's how we keep up with the Caribbean if not for the newspaper, there would be no association that we could actually see and know what is going on and how we (inaudible) so thank you very much from the bottom of our heart. Thank you very much. [applause at 1:10:18.6] Commissioner Wescot-Williams as well as all the commissioners over here, St. Maarten, one more time, thank you for hosting us one more time, we love you, thank you very much! [1:10:29.4]

Our key ingredients for the Congressional Black Caucus where I Chair 43 members, we come from 21 states, we present over 40 million Americans; [applause at 1:10:40.8] five full Committee Chairs, 17 Subcommittee Chairs and others like the Majority Whip and Jim Clyburne from South

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Carolina and others who help to control the Congress. We have the first African doctor in the house, a member of our Caucus who chairs our health branches and very instrumental in us being here, why don't you welcome my sister, Dr. Congresswoman Donna Christensen. [applause 1:11:11.7] Thank you, we love you.

It was mentioned earlier that, and I'm going to say who else is here, you heard from Dr. Payne and I know if he is here in this room you will hear from him again, you did last night, who chairs our Western Hemisphere Committee. Bennie Thompson who is here and I think he came through last night, he chairs our Homeland Security Committee also will be here. Sheila Jackson Lee from Houston, Texas and I know many of you know her, she is en route and will be here just shortly. Our number one Congressman, second only to John Conyers in seniority, from the great state of New York, Chairman of the House Ways and Means Committee, our big brother Charlie Rangel will be here this afternoon. [applause at 1:11:55.3]

And what you probably don't know is the federal budget is \$3 trillion dollars. Charlie's committee handles \$2 trillion of that for Medicare, Medicaid, for veterans programs; his committee is the committee that produces the revenue, \$2 trillion of it, giving it out in what we call entitlements to those programs. I served on Appropriations where the committee spends the money, and I like that too. We spend a million and Charlie generates it and gives it all by formula to the entire committee and our committee handles the appropriations in sending it out. [1:12:33.0]

Together we make up the Congressional Black Caucus and it was said earlier, many more members will be coming and will have come over the years, but I just wanted to say a point of personal privilege, this last six months, the last two months and the last two weeks, members of the Congressional Black Caucus have been crisscrossing America for our now President, Senator Barack Obama. [applause at 1:13:00.1] Even as we had our own elections [applause 1:13:02.4] Tuesday we were all on the ballot as well but (inaudible) just thinking as it relates to it's is major, but most of us went to many states all over this country. [1:13:12.4]

You see 18 of our members represent less than 50% of the African Americans; three of our members represent less than 15% African Americans, the most that any of us represent is a 62% African American so we represent all of America, Asians, Africans, Latinos, Europeans, Native Americans, you name it and we are called the conscious of the Congress and we really are that you know. [1:13:38.5]

God built us from a certain kind of way and we got some of this stuff in us that you do, you cross ethnic lines and it makes us stand up for righteousness, speak up on injustices and when we see something wrong you have to hear it because, of course, we are the conscious of the Congress. So in the spirit of (inaudible) is that Congresswoman Christensen talks about healthcare it's real. They have more because we have less. [1:14:03.2]

We hope and we know that with President Obama yes we had some difficult times in the Mayor laid them out well. And to the sponsors by the way, all of you, we couldn't do this, be with you, help Karl if you weren't here with us so we say thank you very much, you are so important. To all of the sponsors, thank you very much. [applause at 1:14:23.9]

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So as we move to these next four years, two months, 32 days - talk about the short period between November 5th and August 20th, [sic] President Bush is still the President. Our Constitution says that if there is unrest or malice or whatever, the sitting President can hold off and not let happen the January 20th date. There isn't many people that know about that, so we don't want any - we were kind of scared about November 4th when we won. We wanted everybody to be prayerful, be (inaudible) and have fun and all that, don't burn [1:15:00.5]

END PART 2

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TRANSCRIPT OF AUDIO FILE:

11-7AM SESSION - LAST 20 MIN

Thank you for working with Accentance for your transcription needs. The text below represents a professional transcriptionist's understanding of the words spoken. No guarantee of complete accuracy is expressed or implied, particularly regarding spellings of names and other unfamiliar or hard-to-hear words and phrases. "(ph)" or "(sp?)" indicate phonetics or best guesses. To verify important quotes, we recommend listening to the corresponding audio. Timestamps throughout the transcript facilitate locating the desired quote, using software such as Windows Media or QuickTime players.

BEGIN PART 3:

REP. DR. SUZAN JOHNSON COOK: Thank you, Mr. Mayor. Thank you for looking so wonderful. He's dapper. Amen. Doesn't he look good? (clapping). Barack stands on your shoulders because you took the blows and showed what a man of faith could do and we thank you for representing us well.

We also are joined by many and will be joined throughout this conference by many elected officials. Some are here this morning: elected officials from the State of New York. You will hear later from the Honorable David Patterson. You've heard from our city controller, William C. Thompson, Jr., Honorable Adolpho Carrion, Jr., President of the Boroughs of the Bronx, Honorable Nick Hardy, the assemblyman from New York State, the Honorable Ruth Hassell Thompson, State Senator of New York State, the Honorable Keith Wright is with us this morning, assemblyman from New York State, the Honorable Inez Diegens, council whip member of the New York City Council, and Honorable Dr. Kendall Stuart, member of the New York City Council. Can we applaud for all of the elected officials of the State of New York? (clapping)

Members of Congress who will be joining us throughout. Some of whom you have heard from them last night and today, the Honorable Donald Payne, Chair of Subcommittee on Western Hemisphere, the Honorable Bernice Thompson, Chair of Homeland Security, Honorable Donna Christensen, the Honorable Chair of Subcommittee on National Resources, Honorable Sheila Jackson-Lee, and now we hope to also hear from one of our presidents of the Congressional Black Caucus, the Honorable Carolyn Cheeks-Kilpatrick. We're going to the federal level you all: who is our (inaudible) president. We're only working with Mr. President. Will you please come and let us receive her this morning for what a wonderful job you have done and you have served with distinction as well, and we celebrate and salute you this morning. Can we applaud the other members of Congress (inaudible) (clapping).

REP. CAROLYN CHEEKS-KILPATRICK: Giving honor to God who's the head of my life, present protocol being established, but I've got to say in comfort even given that. To Fay and Karl, really (inaudible) really from the bottom of all of our hearts. I cannot be this without you. Thank

you very much. We could (inaudible) ever week in our Washington offices and that's how we keep up with the Caribbean. If not for the newspaper, there would be no association that we could actually see and know what's going on and how we plug in. So thank you very much from the bottom of my heart. Thank you very much.

Commissioner Wescott-Williams, as well as all commissioner's who are here, St. Maarten, one more time. Thanks for hosting us. We love you. Thank you very much.

I bring you greetings from the Congressional Black Caucus, where I chair 43 members. We come from 21 states. We represent over 40 million Americans, 5 full mini chairs, 17 subcommittee chairs, and others like the majority whip and Jim Clyburn from South Carolina, and others who helped to control the Congress. We have the first African doctor in the house, a member of our caucus, who chairs our health brain trust and very instrumental in being here. As being here, won't you welcome my sister back, your Congresswoman Donna Christensen? Thank you, Donna. We love you.

It was mentioned earlier that, I'm going to say who else is here, you heard from Donald Payne, and I know if he's hear in this room, you will hear from him again. You did last night. He chairs our Western Hemisphere Committee. Bennie Thompson, who's here, and I think he came through last night, he chairs our Homeland Security Committee. Also will be here, Sheila Jackson-Lee from Houston, Texas. I know many of you know her. En route, she will be here just shortly. Our number uno congressman, second only to John Conyers in seniority, from the great State of New York, Chairman of the House Ways and Means Committee, our big brother, Charlie Rangel, will be here this afternoon.

What you probably don't know is that the federal budget is \$3 trillion dollars. Charlie's committee handles \$2 trillion of that for Medicare, Medicaid, for veteran's programs. His committee is the committee that produces the revenue, \$2 trillion of that given out in what we call "entitlements" to those programs. I serve on appropriations, where the committee spends the money. I like that too. We spend a million, Charlie generates it and gives it out by formula to the entitlements. Our committee handles the appropriations and sends them out. Together we make up the Congressional Black Caucus.

As it was said earlier, many more members will be coming and have come over the years, but I just wanted to say, a point of personal privilege. This last 6 months, the last 2 months, and the last 2 weeks, Members of the Congressional Black Caucus have been criss-crossing America for our now president, Senator Barack Obama. Even as we had our own election, Tuesday, August 4th, we were all on the ballot as well, but ours wasn't as significant as relates to us as major, but most of us went to many states all over this country. You see, 18 of our members represent less than 50% African-American. Three of our members represent less than 15% African-American. The most that any of us represent is 62% African-American. So we represent all of America: Asians, Africans, Latinos, Europeans, Native Americans. You name it.

We're called the Conscience of the Congress and we really are that. You know, God built us in a certain kind of way. We got some of this stuff in us, as you do with you. Across ethnic lines, it makes us stand up for righteousness, speak up on injustices, and when we see something wrong,

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you have to hear it because, of course, we're the Conscience of the Congress. So the disparities that Donna, Congresswoman Christensen, talks about in health care, it's real. They have more because we have less. We hope and we know that with President Obama, yes we have some difficult times and the Mayor laid them out well. And to the sponsors by the way, all of you all. We couldn't do this, be with you, help Karl if you weren't here with us. We say, "thank you-very much. You are so important". All the sponsors. Thank you very much.

So as we move through these next 4 years, 2 months, 32 days, talk about the short period between November 5th and August 20th. President Bush is still the president. Our constitution says that if there is unrest or malice or whatever, the sitting president can hold off and not let happen the 20th day. There are few people that know about that. So we don't want any, we were kind of scared about November 4th, when we won. We wanted everybody to do prayer. There will be a tone-in and have fun, and all that. Don't burn nothing down. Don't burn up a car and all that because they're waiting. Some people are waiting. Some people are very angry. We are euphoric. God is euphoric and people across ethnic lines, you saw them. The multi-cultural facets of America happy because it was a perfect storm. Financial markets crashing. People losing jobs. Health care unaffordable. Our schools in shambles. Big bad America and we still are: it's just this 8 years we have a man in the White House who knew not Joseph. In his leadership of our country, he not only decimated America, but caused havoc around the world. I know you know that.

So we've got a lot of building to do. What Karl and Fay has done is to energize each of us so we take our rightful places. All of you and all of us together. I'm going to bring into this room 2 of my sisters who we lost over the last year, Congresswoman Stephanie Stubb-Jones, Cleveland, Ohio, will be right here. Right over here, smiling and said "Let's do this". I want you to give a shout-out for Stephanie. She's up in here right now. Congresswoman Juanita Milligram-McDonald from Los Angeles, also with the ancestors are up in here right now. Both chair people I might add. Congresswoman Stephanie Stubb-Jones (sp) of our Ethics Committee and Congresswoman Juanita (inaudible) McDonald of our House Administration Committee. Finally, all during this tenure, 2 years is what Congress is, this is the 110th congress. So many historical things have happened that I mentioned to you already, including electing our first African American president. Then finally Julia Carson from Indianapolis, Indiana, also (inaudible) has been to this conference many many times.

So my brothers and sisters across racial, ethnic gender, geographic, biological, (inaudible) we have much work to do, but it can be done. Because I believe there is a higher power who's directing all of this. We just have to know it and believe it, and do it, and be centered in a higher power.

So as members of the Congressional Black Caucus, as we go back next week to address the financial crisis. You all have been hearing about this \$700 billion, every time I say it, we handle a trillion, our committee, \$700 billion is what we just gave out or given out as we speak. The good thing about that, they were trying to give it all out, \$300 billion of it is gone, but the good news, the new president, anything they put in force, he can pull it back. So we have an opportunity to do some real comprehensive stuff.

The housing market? No more foreclosures. These same people who got the \$700 billion, they were the ones who caused 80%, 85% of the foreclosing. Do you all know that? Predatory lending.

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Loss of jobs. Shifting our jobs over seas. You see, when the financial people do their thing, (inaudible) a billion here and here. It's paper. It's two clicks of the mouse. They were selling bad paper then and they were making big money. My sister, Susan. Let's give Susan a hand. Essence Magazine. Love you girl. (inaudible). We have to be smarter and better as we go forward. Senator Barack Obama, and you may have heard about his prudent campaign. Most of us in this room a 1-1/2 or 2 years, we thought it couldn't done, because we lived with the same people who had to do it. But the perfect storm. Don't forget that. The perfect storm caused by humans. Greedy humans in many cases.

I do a lot of work in the Middle East; Egypt, as well as Lebanon. I do (inaudible) and they're great people, but this president castigated Arabs. In Michigan, where I come from, and John Conyers, we have the largest population of Arabs outside of the Middle East. They've been in our community for decades. They go to our schools. Our children know them. They help and help to build the community. Yes, there are a few bad ones who blew up some (inaudible). God took care of them. They're going to be taking care of. But just like we don't want everybody to measure African-American by a few who do bad things, there are good things in all people. I believe that as President Obama comes into fruition, a member of the Congressional Black Caucus, his job, and he really does believe this, is to bring the races of God's people together. Whether you know God as God, or Allah, or Jehovah, or what have you, that if you really believed in a higher power, let's get busy and rebuild the world.

So, my brothers and sisters, we got a lot of work to do and you do as we go back to New York. Keep the (inaudible) operating. Keep your will strong and knowing that, as president takes his oath and pray that nothing happens between November 5th and January 20th. He can call marshal law. He can go around the country and lock up heathens and Christians, which isn't going to happen. Lock up anybody who might be subversive or such. Create an environment so that January 20th may not ever happen. That's the nightmare. Now snap back. Wake up. He won, it's going to be all right. Let's build a new America again. Let's make sure that our children can have adequate education because it's no longer Michigan against Indiana or Ohio, Michigan against China. It's US against the world and we can build those partnerships the way we do with Faye and Karl, and all of us who have been working for all of these years.

Thirteen is a significant number in the Bible. Thirteen is a number that renews us, gets us ready for the next state of our development. So as we meet here in beautiful St. Maarten, let us rededicate ourselves to a higher power to each other, to knowing that we can do anything but fail. God bless you. (clapping).

REP. DR. SUZAN JOHNSON COOK: Now that's a sister who's got it going on. Thank you so, so much, Congresswoman, Madam President of the Congressional Black Caucus. We can see why, Amen. We are looking forward to great things ahead and you have us as the wind beneath your wings. All of you Congressional Black Caucus members, we are with you so much. Let the church say, "Amen".

We just want to share with you before we present our next speaker. This evening, our host country is going to present us with a fantastic affair. It's going to be offsite and we hope you won't miss it. Transportation is going to be coordinated and we are going to ask that you meet in the lobby at 6:15

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tonight. The transportation will be coordinated by our local government. It's a casual event. It's a beach site affair tonight and we're asking all conference attendees to gather at 6:15 sharp in the lobby for departure. So that's our night affair tonight and we will repeat that announcement throughout the day. If you will just please make note of that as we go forward.

We've heard from the city level. We have heard from the federal government. You know, we are so excited about our first African-American president and many of us also wanted a woman in and it was not a woman's time. It was time for Barack Obama, but in this country, it is a woman's time. As the commissioner who is the leader of government for St. Maarten. Come on somebody. It is Commissioner Sarah Westcot-Williams, our host. She has been gracious. She is elegant. She is eloquent and we are excited about being received by her today. Commissioner Sarah Westcot-Williams. (clapping)

COMMISSONER SARAH WESTCOT-WILLIAMS: Thank you reverends and a very good morning. There's another way to deal with the selfish (sp) protocol and that is by saying, "Welcome friends to St. Maartens". I can say this notwithstanding the many luminaries in our midst because it is truly a welcome to old friends and new acquaintances.

This conference, at this time, on this island, would not have been possible if it was not for the resoluteness and conviction of Mr. and Mrs. Rodney. It was 6 years ago that many of you were here on St. Maarten for the conference as well. It is with a lot of confidence that last year, I threw out the idea of why not again St. Maarten, has been at that time five years ago. This year, it is six years ago. It was only after throwing it up as we sat down to plan, I realized that this conference would have been held two days following the most important election in modern times of the United States of America. As we, Commissioner Malven (sp) and myself visited Karl and Fay in New York, I said to him, "Karl, as much as I want this conference on St. Maarten, I don't know if the timing is right." He said without being presumptuous about the outcome of the election, he said, "Oh no, I believe the timing is right". And with a-gee in his eyes, I suspected that he was counting on a victory and a big one, and felt that St. Maarten would be a place where we could celebrate that victory.

This small island of ours, and I'm aware of the clock, just in case I was to get my sign from the back, but this small island of ours, only 37 square miles and that is both sides of the island, tonight you probably would understand. You will get to know how we share the island, but I can tell you that St. Maarten is the smallest side of the two. Nevertheless, we accommodate close to two million tourists annually on this island. Approximately 1.5 million visit our island by cruise and the others come here to stay over with us, relax and enjoy our island. And yes it is so opportune and truly a region in transition.

Throughout this region, every island, every island nation, every country, is going through some sort of transition. For St. Maarten itself, we are going through a major constitutional transition. Moving from what others term as called an island territory, a remnant of a colonial system, to that of a country within the kingdom of the Netherlands. The French side, just last year, moved from a French municipality to what is called in their terms, "a collectivity". So yes, this region is truly in transition and change is all around us. This side is so important for the relationships between the

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United States of America and the Caribbean region. I am again so thrilled to hear so many of you speak of kinship, relationships, and ancestry as you recognize this region for what it is.

Term water (sp)? Yes. Maybe, but definitely a part of the United States of America. However you take it or twist it. The Diaspora of the West Indies and the United States of America. It's big. It is great and we need to continue to recognize that forging those relationships strengthen it year after year through this conference call is extremely important. As if it wasn't enough to realize that we were going to start a conference two days after such an important election, just barely three weeks ago, St. Maarten was brushed by Hurricane Omar, a category 3 hurricane. So if you were around and you noticed that the scenery is not exactly what you expected of it, if you feel a little in the roads as you go from place to place, recognize that that is what had happened. But Karl decided the conference was going to go on and the conference will go on, Karl, right here in St. Maarten.

So tonight it is my pleasure to host you at another side of the island because you are here two days after the election, two days after a historic election, and yes, notwithstanding the turmoil and the challenges, President Barak Obama is going to face, the party too will continue and the party on St. Maarten will continue this evening on the other side of the island hosted by the Government of St. Maarten. I encourage you and those who are part of the latest workshop this afternoon, to do it well, right, and try to get out as soon as possible so that we can move from here in a timely fashion and the police escort will only be something to show you how proud we are of having all of you here. But we will get to the other side of the island nicely, on time. A region in transition. Thank you for being here at this time in your history and in our history.

I welcome all of you and it is wonderful to be able to open this conference in a time like this because it is for such a time that you are here and we are here, and it is such a time that President Barak Obama was chosen to lead the United States of America and, with that leadership, to be the leader of the free world. If, just if, approximately 40,000 more persons voted could have given him even more votes, he would have had those from right here on St. Maarten, the friendly island of the early (inaudible). So today, we too rejoice with you and we too are hopeful that the change that is coming will be a good one for all of us. We just hope that some of that invigoration and renewed energy that we all will get from this conference will serve you well, when you go back and will serve us well as we continue to build our island nations from strength to strength and with God, all things are possible. Have we not seen that on November 4, 2008. What a wonderful way to celebrate and, Karl, what a wonderful thing to happen (inaudible) St. Maarten and deciding the conference welcomes the 13th Annual Multi-National Caribbean Business Conference. Thank you. Welcome. Enjoy it and may God continue to bless you richly. Thank you.

The question was how casual can you be tonight? You be as casual as you feel comfortable on an island that is your host. So men, absolutely no jacket and ties. I would not recommend that, but be as casual as you've been comfortable. Thank you.

REV. DR. SUZAN JOHNSON COOK: All right. This is where we break. Hold on. We have (inaudible) ceremony. If you will just wait for us please. We're going to invite all of the sponsors and the elective officials to please join the Rodneys as our host today. here up front for our ribbon cutting ceremony. All of our sponsors, all of our elected officials that are present, please come and

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join us up front. Those who are our speakers this morning, please right here in the front of the stage, and we will be lead. All rise. (singing)

END TRANSCRIPT

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Exhibit 4

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended.

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re: Representative of Citi
Review #: 09-2567; 09-4403; 09-3698; 09-6333; 09-2222
Date: March 17, 2009
Location: AkinGump NYC - 399 Park Ave, New York, NY
Time: approximately 2:00 to 4:00 p.m.
Participants: Leo Wise
Omar Ashmawy

Summary: The Representative of Citi was the Citi employee who managed their donation to the Thirteenth Annual Multinational Business Conference. The OCE requested an interview with the Representative of Citi and he consented. The Representative of Citi made the following statements in response to questioning:

1. The Representative of Citi was given an 18 U.S.C. § 1001 warning and consented to an interview. The Representative of Citi signed a written acknowledgement of the warning [attached].
2. The Representative of Citi was laid off from Citibank on December 15, 2008. At the time he was laid off he was Community Relations Officer for Brooklyn and Staten Island
3. The Representative of Citi joined Citi in December 2003. He had previously worked for Chase in a similar capacity. Chase sponsored previous Caribbean Multinational Business Conferences. The Representative of Citi attended the conference when he was at Chase. Chase was the first financial institution to act as a sponsor at the conference.
4. When he came to Citi, he was told to "lead the charge" in terms of Citi's participation in the conference. His superiors made the decision that Citi should participate.

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5. The Representative of Citi's direct supervisor was Eileen Aulden, New York State Director; she reported to Kathy Ebanks, Regional Director. Eric Eve, Senior Vice President for Community Relations headed the Representative of Citi's department. Mr. Eve made the decision to support the conference and decided on the dollar amount. The Representative of Citi was in charge of managing Citi's participation.
6. Citi donated \$75,000 to support the conference. Citi was the only "senior" sponsor. The money was specifically for the conference. Citi did not put any specific restrictions on how the money could be used to support the conference. The check came from Citi's sponsorship budget and was either made out to the Carib News or the Carib News Foundation.
7. In previous years the amount Citi donated was less. In 2007 it was \$50,000.
8. Karl Rodney chose the location of the conference. Governments in the region made bids to host the conference.
9. The only person from the conference that the Representative of Citi dealt with was Rodney. The Representative of Citi met with Rodney on 5 occasions between May and November 2008. These meetings concerned the program at the conference and Citi's participation in it. These meetings were not about the amount of Citi's sponsorship or to negotiate that in any way. The Representative of Citi described this interaction as a "dialogue" with Rodney. Rodney was receptive to suggestions about the program.
10. At these meeting the Representative of Citi would tell Rodney how he would like to "position" Citi at the conference. Citi participated in the luncheon, with Eve as a keynote speaker, and in workshops that fit their business. The lunch topic was set by Rodney. The Representative of Citi then tried to "position" Eve in a complimentary way. The Representative of Citi recalls suggesting to Rodney that Citi could do a workshop on financial education.
11. Rodney did not present a written agenda for the conference before any of their 5 meetings. The first time the Representative of Citi saw a written agenda was a week or a week and a half before the conference began in early November. The Representative of Citi recalls seeing a draft agenda. He was shown the draft agenda submitted to the Committee on Standards of Official Conduct [attached as Exhibit B] and said he saw some version of the draft agenda but not this specific one. He did recall seeing the panel entitled, "Creative Financial Solutions" on page 9 of Exhibit B. He said when he saw

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- that panel he thought he could participate in the panel and talk about foreclosures. He "vetted" that topic internally at Citi and then proposed it to Rodney and Rodney agreed.
12. The Representative of Citi attended the dinner on Thursday night. He does not recall Congressman Payne speaking.
 13. The Representative of Citi participated in the ribbon cutting with members of Congress, host government officials and major sponsors on the Friday morning of the conference. The Representative of Citi got sick on Friday and missed the evening event.
 14. Eve did not have a sit-down meeting with the members of Congress in attendance to the Representative of Citi's knowledge.
 15. The Representative of Citi did not have more than "cursory" conversations with the Members of Congress who attended. He saw all members that attended more than once. He saw most of them on Friday and had seen everyone by Saturday.
 - a. The Representative of Citi recalled Congressman Rangel was there. The Representative of Citi thought he first saw him on Friday and saw him on Saturday. The Representative of Citi thought he saw him at different events.
 - b. The Representative of Citi saw Congressman Payne on more than one occasion.
 - c. The Representative of Citi saw Representative Kilpatrick early on Friday. He does not recall her speaking.
 - d. The Representative of Citi saw Representative Thomson on Thursday; he saw him on more than one occasion.
 16. 300 to 350 people typically attended the event. It was open to anyone.
 17. The conference was billed as the Carib News conference. Rodney is the publisher and CEO of the Carib News. In May or June one would start seeing advertisements for the conference on the back page of the Carib News. The Representative of Citi thought Citi's check went to the Carib News Foundation but did not know what the Foundation did other than the conference. The Representative of Citi thought the conference was "totally" financed by the sponsors. He did not know if Carib News put up any money for the conference.

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended.

18. The Representative of Citi said Rodney saw the conference as an opportunity to position the Carib News as the "voice of the Caribbean" which is how the paper markets itself in New York.
19. Citi saw the conference as offering Citi three benefits: (1) it sent a message to their partners; (2) it was a business opportunity; and (3) it was good for Citi's image.
20. The members of Congress lent the meeting "clout."
21. Sponsors also bought ad space in the Carib News. This was not part of their sponsorship of the conference. Citi bought ad space in the Carib News.
22. The Representative of Citi also knows Rodney from the Board of the University of the West Indies. Both he and Rodney are members and participate in telephone meetings and, occasionally, in in-person meetings.

We certify that this memorandum contains all pertinent matter discussed with the Representative of Citi on March 17, 2009.

Leo J. Wise
Staff Director & Chief Counsel

Oinar Ashmawy
Investigative Counsel

OFFICE OF CONGRESSIONAL ETHICS
U.S. HOUSE OF REPRESENTATIVES

18 U.S.C. § 1001 ACKNOWLEDGEMENT

I have been provided with a copy of the text of section 1001 of title 18, United States Code (popularly known as the false Statements Act) and hereby acknowledge that it applies to any testimony or documents I provide to the Office of Congressional Ethics.

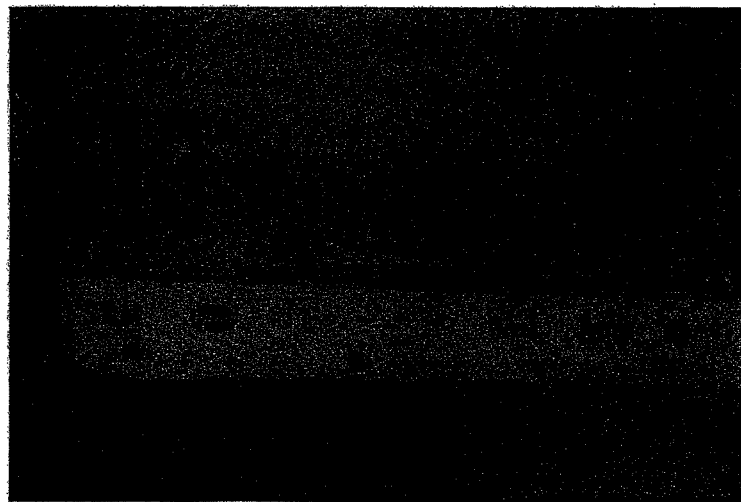
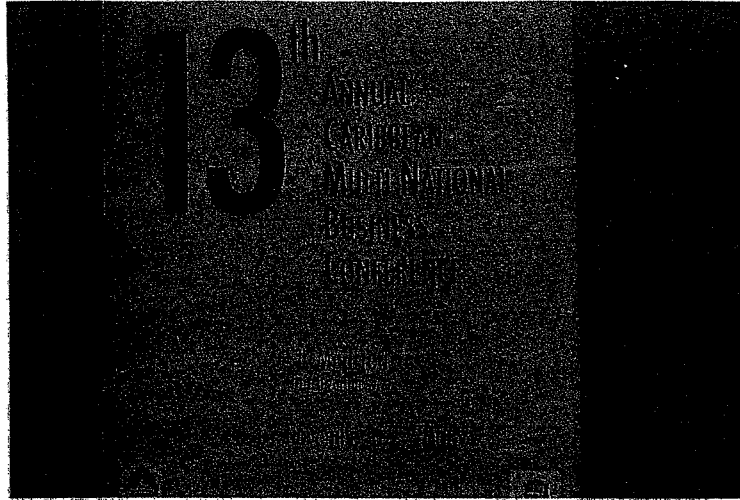
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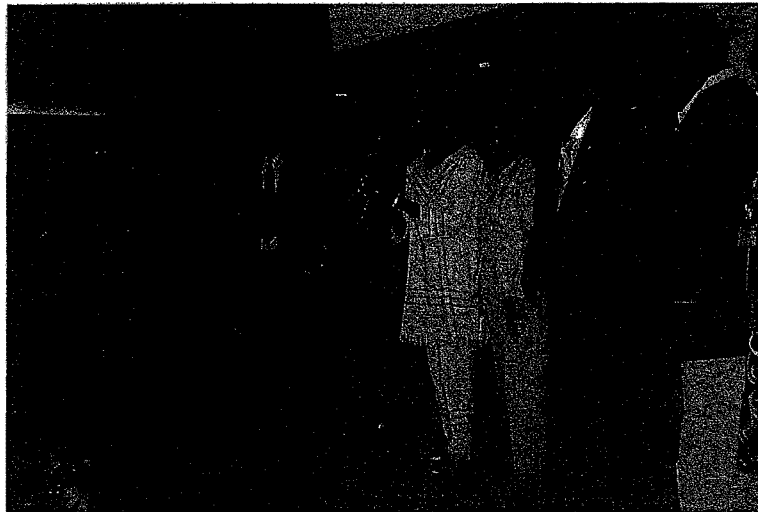
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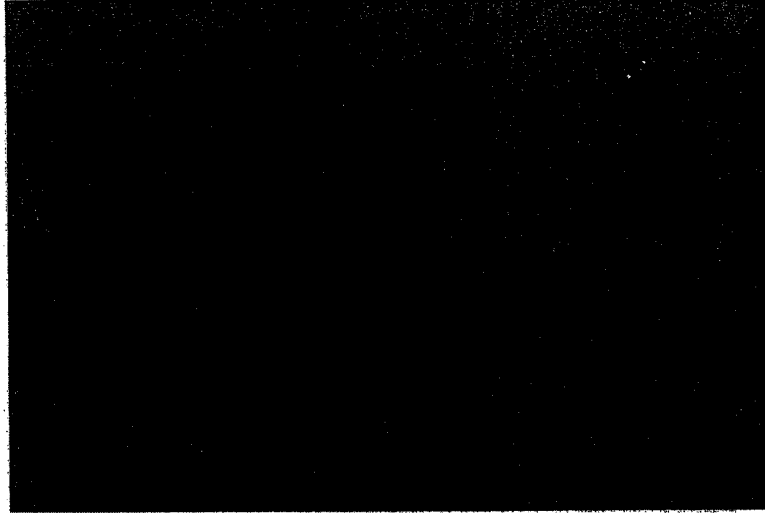
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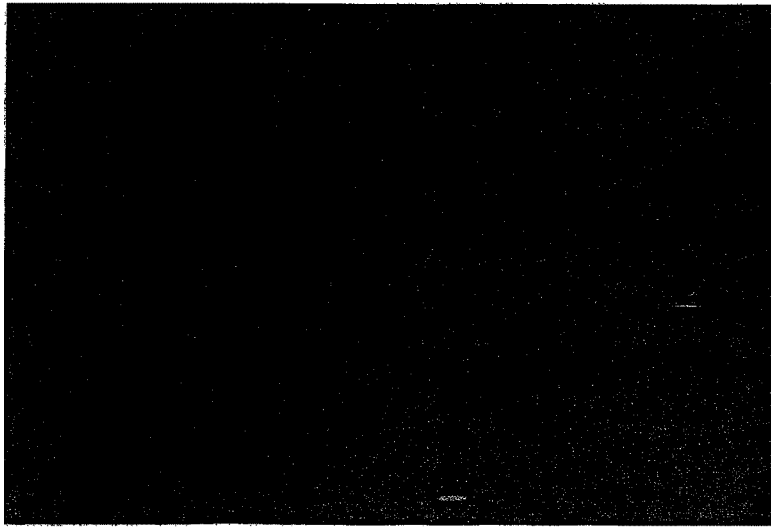
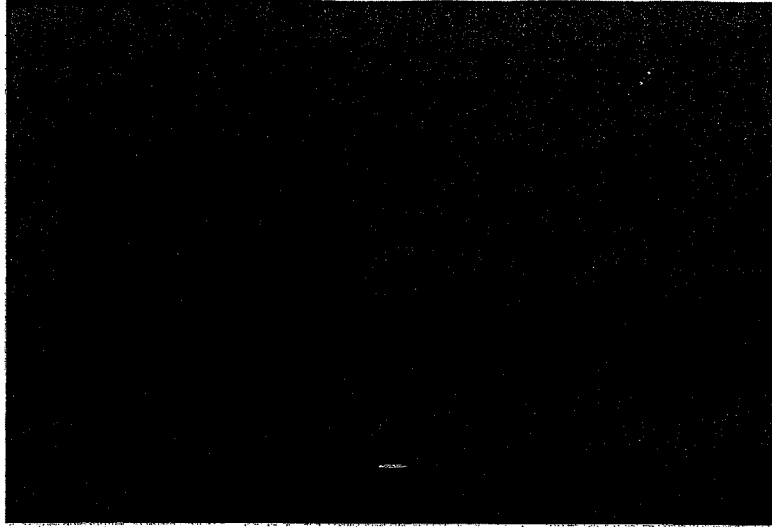
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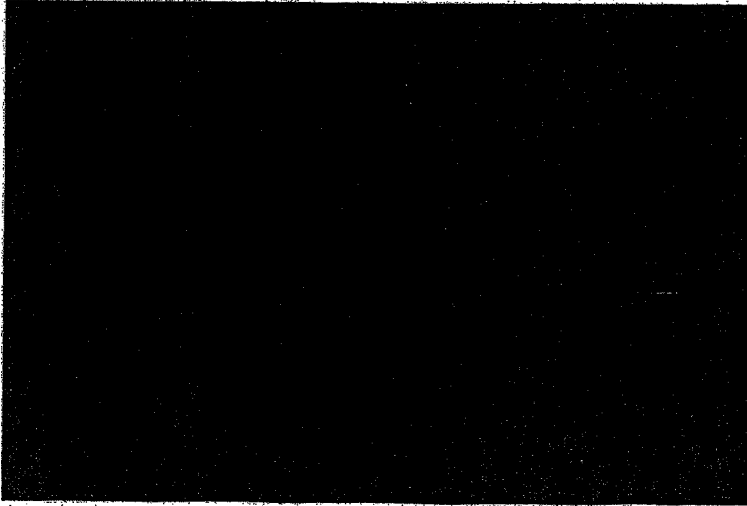
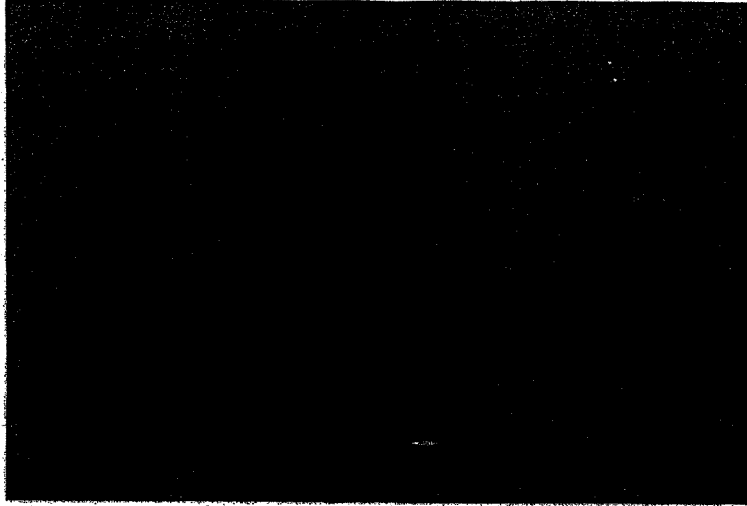
Exhibit 5

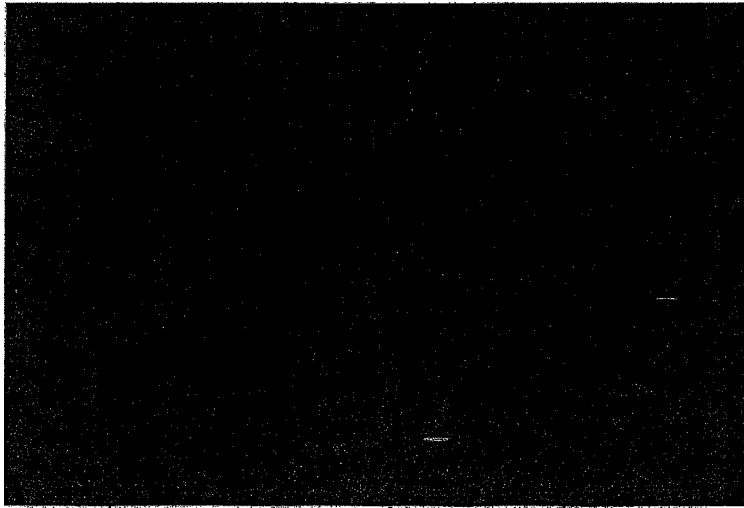


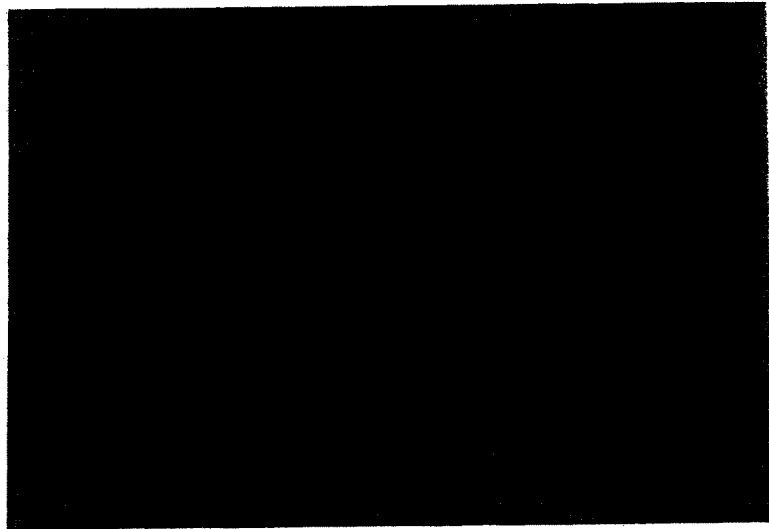
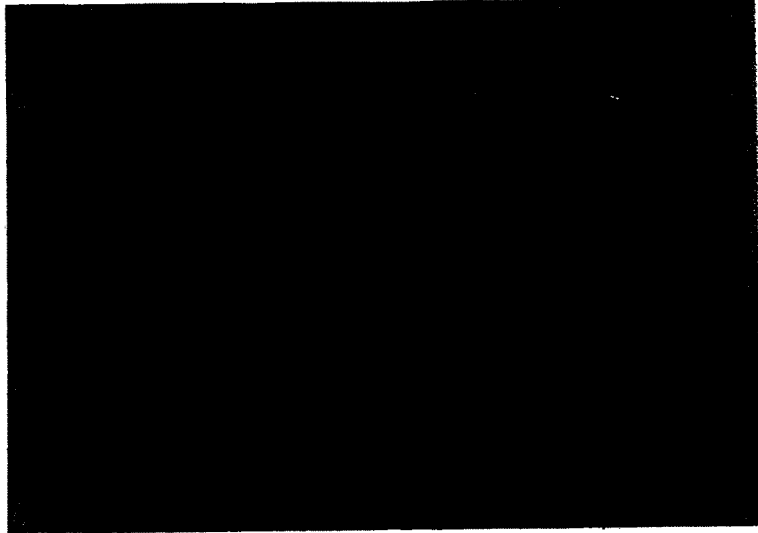


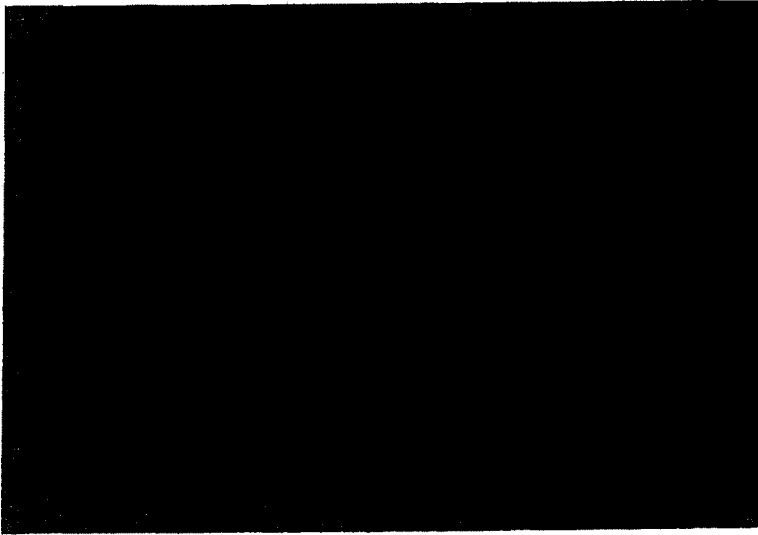
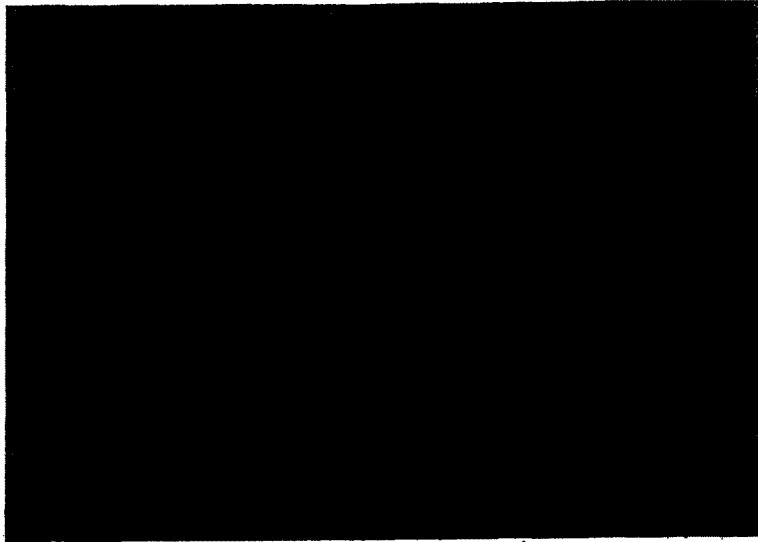












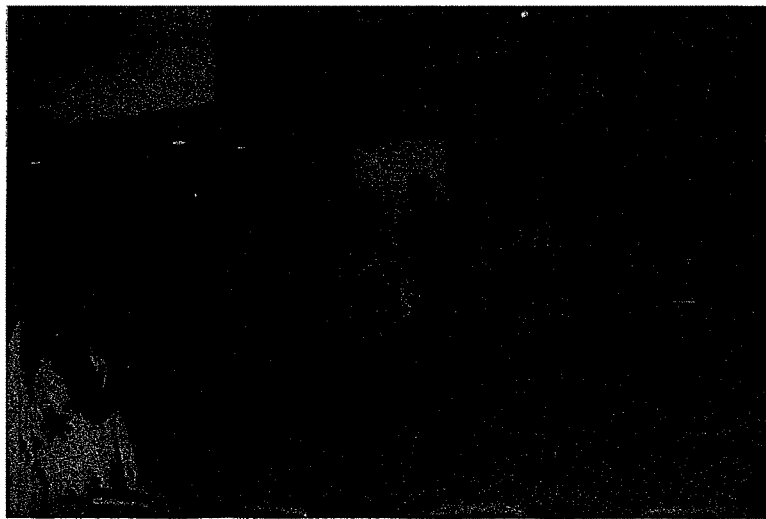
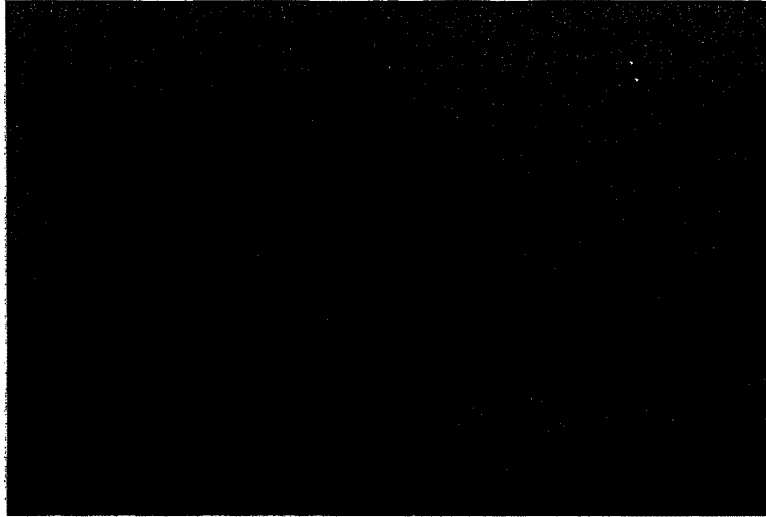


Exhibit 6

STROOCK

JOEL COHEN
DIRECT DIAL: 212-806-5644
DIRECT FAX: 212-806-2644
JCOHEN@STROOCK.COM

DANIELLE ALFONZO WALSMAN
DIRECT DIAL: 212-806-5607
DIRECT FAX: 212-806-2607
DWALSMAN@STROOCK.COM

May 18, 2009

BY EMAIL AND REGULAR MAIL

Mr. Leo Wise
Staff Director & Chief Counsel
Office of Congressional Ethics
United States House of Representatives
1017 Longworth House Office Building
Washington, DC 20515

Re: Request for Information, Review No. 09-2567

Dear Mr. Wise:

In response to your request for our clients' voluntary cooperation regarding your office's questions pertaining to the Thirteenth Annual Caribbean Multi-National Business Conference (the "Conference"), we submit the following responses. Based upon our review of the questions and our multiple conversations with your office, we believe that these responses contain the information that you are seeking. As with our previous production, to the extent that the Freedom of Information Act is applicable to any submissions made to the Office of Congressional Ethics, our clients hereby request that the information provided be treated confidentially.

The Host country participated in the Conference as follows: (1) developed local Host Committees to facilitate local planning, (2) helped to negotiate the rate with the hotel, (3) assisted in developing the theme of the Conference, (4) assisted in identifying local speakers, including the Leader of Government, (5) assisted in local publicity, (6) provided local entertainment, including a school choir and cultural items, (7) arranged Host Country Evening on Friday, November 8 (the group was transported to another property for refreshments and entertainment), (8) helped with local transportation for some Carib News employees and helped arrange accommodations for some guests (not paying for such accommodations), (9) participated

09-2567 0079

Leo Wise, Esq.
May 18, 2009
Page 2

as event Speakers, and (10) issued invitations to attend to specially invited guests. The Host Country provided no funds towards the cost of the Conference.

The cost for members of the public to attend the conference for the four days and three nights was \$840.00 for double occupancy or \$1085.00 for single occupancy. The cost of attendance covered room accommodations, meals, and admission to the Conference presentations.

The attending Members of Congress participated in sessions relevant to their Committee assignments in Congress and demonstrated interest in a particular subject matter. For example, Congressman Bennie Thompson spoke at presentations on Hemispheric Security and Immigration/ Deportees, Congresswoman Donna Christensen spoke at a Town Hall Forum on Health, and Congressman Charles Rangel spoke at presentations on Haiti and the Caribbean, and the current crises facing them. In addition, all of the Members of Congress participated in a session with the local Ministers of Government to discuss issues of interest to the Caribbean region. Though correspondence with the Members of Congress indicated that a memo of the Closed Door Session would be distributed after the Conference, no such memo was ever drafted or distributed.

The total cost of the Conference approached \$300,000. These costs included direct expenses such as travel, event planner fees, local staffing, and hotel payments, as well as Carib News operating expenses for the purpose of the preparation and implementation of the Conference. The Conference costs were paid using (1) registration fees by the attending guests, (2) contributions from corporate participants, some to Carib News and others to Carib News Foundation, and (3) general funds of Carib News. Each of three sources of funding was pooled together to pay the various expenses.

If you have any questions regarding this information, please do not hesitate to call.

Very truly yours,



Joel Cohen

and



Danielle Alfonzo Waisman

09-2567 0080

Exhibit 7

AKIN GUMP
STRASSER KUDRINSKY
LLP

STEVEN R. ROSS
202.887.4343/fax: 202.887.4288
sross@akingump.com

March 31, 2009

Mr. Leo J. Wise
Staff Director and Chief Counsel
Office of Congressional Ethics
1017 Longworth Building
Washington D.C. 20515

Re: Citigroup, Inc. Production

Dear Leo:

On behalf of our client, Citigroup Inc., we are providing you with two documents in response to your oral request of March 17, 2009. Please find a copy of a solicitation letter to support the 2008 Caribbean Multi-National Business Conference, dated April 4, 2008, from Carib News Foundation to our client. In addition, please find a copy of both the front and back of check number 5006611264, dated June 13, 2008, payable to Carib News Inc, in the amount of \$75,000.00. A search of our client's records has not uncovered any evidence of a receipt being provided for the above-mentioned check. We will produce this document should it be identified.

The documents we are producing today are confidential and proprietary in nature, and have been marked accordingly. We ask that these documents be kept confidential by your Office and your staff. Notwithstanding our request that these documents be kept confidential, due to their sensitivity, we ask that your office or staff provide us with notice and an opportunity to be heard before disclosure of any information from these documents to any third parties.

In addition, we are providing you with an original signed document of Michael Flanigan dated March 23, 2009, acknowledging the False Statements Act.

Please let me know if you have any questions.

Sincerely,

Steven R. Ross

09-2567 0082



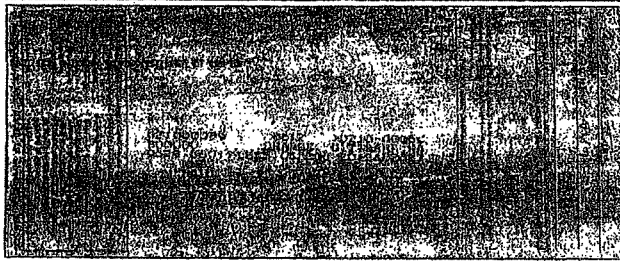
* Please Call Citigroup.com

Citi Check Image Delivery

- Print
- Close Window
- Check Image Inquiry Results

Account #	Check #	Amount	Paid Date
0000038653877	5006611264	\$75,000.00	06/24/2008

	<small> CITIGROUP BANKING SERVICES CITICORP CENTER PL. 0-0-4 CITICORP CENTER PL. 0-0-4 </small>	<small> 06-30 311 </small>	<small> No. 8082651284 Date: 13-JUN-2008 Vendor No. 295613 </small>
	<small> ORDER OF CARM NEWS INC 18017 L&S ST 052308 CHARGE 7 WEST 33RD STREET 8TH FLOOR NEW YORK NY 10018 </small>	<small> \$75,000.00 NOT VALID AFTER 180 DAYS </small>	
<small> SEVENTY-FIVE THOUSAND AND 00/100 DOLLARS </small>			
<small> ANDRES HAROLD </small>			
<small> CITICORP BANK, A SUBSIDIARY OF CITIGROUP CITICORP INC. NEW YORK, NY 10038 </small>			
<small> *5006611264* *0311002098* 28852877* *0007500000* </small>			





Carib News Foundation
 7 West 36th Street, 8th floor, New York, NY 10018
 Tel: (212) 944-1991; Fax: (212) 944-2089
 E-mail: info@caribnewsconference.com

April 04, 2008

Mr. Eric Eve
 Senior Vice President
 Community Relations
 Global Consumer Group
 Citigroup Inc.
 850 Third Avenue, 12th floor
 New York, NY 10022

Dear Mr. Eve: 

For the past twelve years, the annual Caribbean Multi-National Business Conference has been instrumental in encouraging investment, cross-border trade and business partnerships, the role played by executives of major corporations, medium and small-size businesses and entrepreneurs, and deepens the connections with key elected officials.

Your support and that of *CITI* went a long way to make the Conference a success, and has fostered on-going growth in business achievements and impactful policy decisions. We appreciate your encouragement, your personal participation, and the very stature your presence brings to the Conference. We do get concrete results and expressed appreciation of new opportunities.

We can assure you that all the key stakeholders, Members of Congress, Heads and Ministers of Government, Elected Officials, Community and Business Leaders are all aware and appreciative of yours and *CITI'S* participation in this very important mission.

This year, the Thirteenth Annual Conference is scheduled to be held in St. Maarten, November 6 - 9, 2008, and promises to further strengthen and expand on the work done by many of the Caribbean countries developing economies, in collaboration with the emerging markets initiatives in the U.S. The quality of the sessions and the high level of participation is now legendary, and is anxiously awaited each year.

Enclosed is a Power Point presentation of the sponsorship opportunities the Conference provides, and also a program and recap of the 2006-2007 Conference. We know of your interest to deepen the *CITI* local, regional and global connections, and I know the Conference can achieve that. It is our sincere wish that this presentation motivates your sponsorship.

Organized by Carib News Foundation. A non-profit project 501-C3 corporation

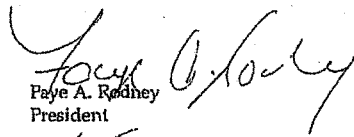
09-2567 0084

We would be happy to answer any questions you might have or to fill in any detail.
I can be reached by e-mail: KBRodney@nycaribnews.com or (212) 944-1991.

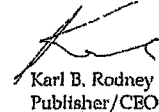
Because we know of your busy schedule, I will also follow up with your office to ascertain interest level.

Thanks for your kind consideration.

Best regards,



Paye A. Rodney
President



Karl B. Rodney
Publisher/CBO



OPENING THE REGION
INVESTMENT & BUSINESS OPPORTUNITIES

BUILDING THE GLOBAL NETWORK
GOVERNMENT LEADERS - ELECTED OFFICIALS
IMPACTING ECONOMIC POLICIES

PARTNERSHIPS
CORPORATE EXECUTIVES - SEEKING
EXPANSION & GROWTH



**DOING BUSINESS
TOGETHER**



“IMPACTFUL”

EXPERIENCE THE POWER OF THE



**THIRTEENTH
ANNUAL
CARIBBEAN
MULTI-NATIONAL
BUSINESS
CONFERENCE**

**ST. MAARTEN
NOVEMBER 6 – 9, 2008
BUILDING KEY CONNECTIONS FOR GROWTH**



THE MISSION

- ◆ To bring together businesses, community, and government leaders interested in understanding the economic opportunities in the Caribbean marketplace locally and in the Caribbean.
- ◆ To make a global community among Diverse Business entities and The Caribbean.
- ◆ To Link the emerging markets of the U.S and the Developing Economics of the Caribbean and Latin America.

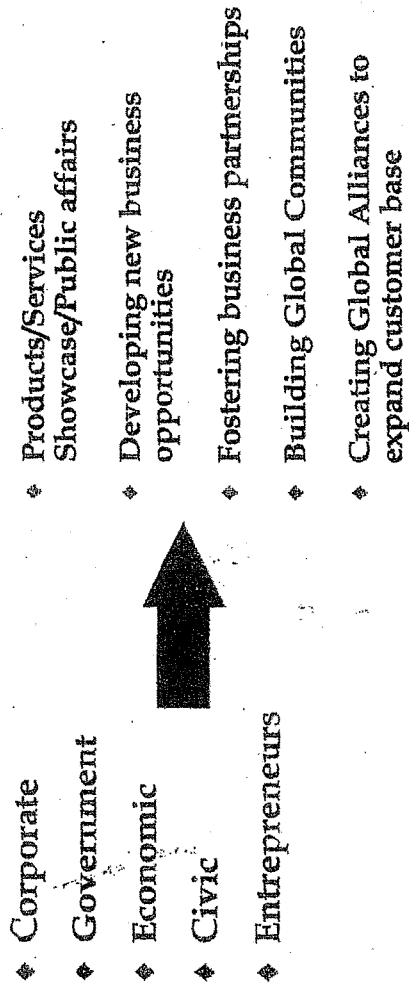


THE OPPORTUNITY

- † **Marketing:** Understanding the market in the US and the Caribbean.
- † **Business development:** Meeting potential customers and potential partners.
- † **Strategic analysis:** Understanding the possibilities of emerging markets in the US and the Caribbean.
- † **Corporate image:** Demonstrating your commitment to the Caribbean Community, and the program of diversity.
- † **Community relations:** Establishing lasting relationships with key community leaders.
- † **Government relations:** Meeting with and discussing topics of interest with significant elected officials from the US & the Caribbean.



STRATEGIC PARTNERSHIPS



THE FACTS

- ◆ 31.9 billion US dollars in foreign investment Came into the Caribbean, up 36 percent from 1996.
- ◆ Tourism is the key economic foundation in the Caribbean. Approximately 11 million cruise passengers a year visit the Caribbean, providing Import/Export Opportunities.
- ◆ The Caribbean, in aggregate, is the 10th largest export market for the U.S, surpassing France and other countries, and providing opportunities for marketplace products.
- ◆ The \$15 billion market of the Caribbean American community and overseas



THE LEGACY

- * Jamaica - 1996
- * Barbados - 1997
- * St. Lucia - 1998
- * St. Croix/USVI - 1999
- * Jamaica - 2000
- * Grenada - 2001
- * St. Maarten - 2002
- * The Bahamas-2003
- * St. Kitts-Nevis-2004
- * St. Thomas, USVI - 2005
- * Panama city, panama - 2006
- * Antigua & Barbuda - 2007

- * Building Consumers Awareness
- * Developing Working Alliances
- * Reaching Defined Target Markets
- * Making the Right Connections
- * Expanding Diverse Market Places
- * Successful Joint/Ventures
- * Successful Regional Investments



THE OVERVIEW

"Some companies have discovered that the Caribbean offers a great deal more than beautiful beaches and sunshine. They have recognized its tactical importance in this era of globalization. We are proud to provide a useful platform for companies that are seeking to sharpen their international competitiveness.

For the past twelve years, the Annual Multinational Business Conference has been creating links between the Caribbean, Central America and the U.S. Usually, during four days of workshops, luncheons and dinners, Caribbean Political Heads of State and Ministers of Government, Members of the Congressional Black Caucus, Local and Regional Politicians, business persons and influential individuals from the U.S. and the Caribbean discuss, interact and network around issues of mutual concern. Relationships are built and business deals are made.

We hope that in 2008 you will join us"



PARTICIPATION

Platinum LEVEL - \$75,000

- ❖ Keynote Speaker at Main Event
- ❖ Sponsor Private VIP Reception and specially arranged forum
- ❖ Special Awards Presentation
- ❖ Display, Exhibition and signage
- ❖ Area of Conference -Reserved for exclusive sponsorship
- ❖ Full page Ad in program
- ❖ Air Transportation for 2 people
- ❖ Accommodations: One Suite and One Standard Room
- ❖ Included in all printed materials
- ❖ Included in Internet promotion
- ❖ Display company logo and link to our website
- ❖ Sponsor of a Gala Event
- ❖ Sponsor and Participate in a workshop
- ❖ Representative listed in program with bio and photo



PARTICIPATION

GOLD LEVEL - \$50,000

- † Sponsor a Workshop
- † Sponsor a Gala Event
- † Display, Exhibition and signage
- † Included in all Printed Material
- † Included in all Internet Promotion
- † Display of Company Logo and Link to Our Website
- † Full Page Ad in Program
- † Representation in the Brochure
- † Air Transportation & room accommodations for 1



PARTICIPATION

SILVER LEVEL - \$25,000

- ◆ Sponsor & Participate in a Workshop
- ◆ Display and Exhibition
- ◆ Banner in Public areas & at workshop
- ◆ Included in all printed materials
- ◆ Included in Radio and TV Promotions
- ◆ Included in the internet promotion
- ◆ Sponsor an event i.e. breakfast, lunch or dinner
- ◆ Full Page ad in program and recap
- ◆ Representatives listed in program with bio & photos
- ◆ Representatives listed in brochure



PARTICIPATION

SUPPORTER

\$15,000

\$10,000

- ◆ Display and Exhibition
- ◆ Banner in Public areas & at workshop
- ◆ Included in all printed materials
- ◆ Included in Radio and TV Promotions
- ◆ Included in the internet promotion
- ◆ Full Page ad in program and recap
- ◆ Representatives listed in brochure
- ◆ Representatives listed in program with bio & photo
- ◆ Display and Exhibition
- ◆ Banner in Public areas & at workshop
- ◆ Included in some printed materials
- ◆ Included in some Radio and TV Promotions
- ◆ Included in the internet promotion
- ◆ Full Page ad in program and 1/2 page in recap
- ◆ Representatives listed in program



Government Participation

"This Conference is keeping us informed. There would never have been a banana problem had we (CBC) known about the issue before it went to the WTO."
Congressman Charles Rangel



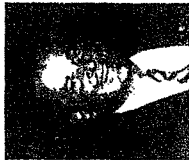
"The Conference in Antigua with Members of the U.S. Congress was very important and extremely vital to both the U.S. and Caribbean interests. It highlighted the need for the Caribbean to pay greater attention to the role of Congress in the formulation of U.S. policy."
*Hon. Baldwin Spencer
Prime Minister of Antigua*



"The conference is central to the promotion of our mutual interests in the U.S. in general, New York City in particular, and the Caribbean. It is essential for all of us to work together to spur economic growth and social expansion at home and in our neighborhoods."
*William Thompson, Comptroller,
New York City*



"The results of the Conference went far beyond our expectations. The process of bringing families together, of sharing a vision for our countries, couldn't have been scripted. The sessions brought out ideas, options and other benefits which should be long lasting."
*Juan Carlos Navarro, Mayor, Panama
City, Republic of Panama*



CORPORATE PARTICIPANTS

Eric Ewe - SVP Community Relations, CITICORP. - "The time is ripe for Caribbean nations to come together and get on "the road," to articulate the strength of their economies and stability of their business climates. The Conference is a great place to start to open clear lines of communication between the private and public sectors of the Caribbean and the U.S."



Edward J. Goldberg, SVP Government & Consumer Affairs, MACYS. - "We have whole files of opportunities to build business partnerships in the current corporate environment. The conference is conducive to exploring new areas of business, and we have taken advantage of this to both the region and MACY's benefit."



Martyn Johnson, VP Market Development, IBM Corporation. - "IBM and its partner ENI Enterprise Network, through its presentation at the Conference, is taking the audience up through levels of technology, understanding the application of E-commerce. This conference makes a difference in the lives of the attendees."



Karen Boykin-Towns, Senior Director of Public Affairs. - "The conference provides an ideal opportunity for Pfizer - It demonstrates its commitment to health forums internationally, but also to network with key decision makers. Collaboration is necessary between the Caribbean to make improvements and adjustments to healthcare and its delivery."



Marie Long, VP Constituency Relations, AT&T Foundation. - "As many of you know, AT&T has changed in the last 5 years. Its growth, dynamism and change have created what some of us call the new AT&T. The real and driving force behind our success as a corporate entity is the culture of inclusion and collaboration. We recognize the great work being done at the conference to improve business and personal lives, exchange ideas, and assist alternative strategies that could lead to technology transfer and to growth."



Javier Evans, FVP Human Resources, HSBC Bank. - "We provide financial services to a vast array of businesses and individuals, and this gives us a unique perspective on different cultures and ways of doing business. We want to engage our partners in mutually beneficial relationships within our communities and that is why we seize the opportunity to link with CARIB NEWS and the Conference. It is a tremendous value to us."



CARIB NEWS and the Conference.



UNIQUE OPPORTUNITIES



Ambassador Andrew Young

"If only the sons and daughters of Africa will remember from whence they came, then our roots should be a constant reminder of who we are and where our countries can go with our input. This is why the Carib News Conference is so important and that is why I support it."



Hon. Percy Sifton

"We badly needed a forum to address the need of us working together. This conference is an excellent idea and we should have been doing this long ago."



Hazel N. Dukes, President, New York State NAACP

"The conference, presenters and participants have been extraordinary. I have gained tremendous knowledge on the Caribbean Diaspora. I continue to promote and foster relationships with communities here and at home"



Harry Bakfouts, Entertainer

"The Conference is like a table set with a feast of great ideas provided by some of the best minds. The table is set - it is for us to partake."



David Dinkins, Former Mayor of New York City

"Education is the very key for the development of our people. I have always held that position; that is why I am so pleased to participate in the Education Forum at the Conference. There is an eagerness on the part of the audience to know more about our system. The collaborative effort of CARIB NEWS and the Conference wins my support."



Roy Hastick, President/CEO Caribbean American Chamber of Commerce

"The work of the Conference is legendary in the Caribbean and the U.S. Where else do you find this level of leadership from all sectors coming together to advance doing business. It is the most effective way of building a Global Network."



Susan Taylor, Editor Emerita, Essence Magazine

"It is always so wonderful to experience the drive, enthusiasm and determination of the Conference participants. It says something wonderful is happening and we all need to tap into it. It provides such outstanding opportunities to connect with real people who can make things happen."



Lloyd Williams, President/CEO Greater Harlem Chamber of Commerce

"I have always advocated cross-border business opportunities for the Chamber members, and that is why for the entire twelve years of the conference, the Chamber has made it a priority event. Our members have reaped the benefits and have also made great contributions."

INVEST IN SUCCESS



**A WEEK-END THAT CHANGES
LIVES**

'EXPERIENCE THE POWER'



15

09-2567 0101

Exhibit 8

Board
David Skaggs, Chair Porter Goss, Co-Chair
Yvonne Burke Jay Engen
Karan English William Frenzel
Allison Hayward Abner Mikva



Leo J. Wise, Staff Director & Chief Counsel
1017 Longworth House Office Building
(202) 225-9739
(202) 226-0997 fax
email address: gce@mail.house.gov
website address: oec.house.gov

OFFICE OF CONGRESSIONAL ETHICS
 UNITED STATES HOUSE OF REPRESENTATIVES
 WASHINGTON, DC 20515

Mr. Frank Weber
 Internal Revenue Service
 Freedom of Information Reading Room
 1111 Constitution Avenue, NW
 Washington, DC 20224

March 31, 2009

Dear Mr. Weber,

Thank you for talking with me this afternoon and for offering to help me with this request. I need to know if Carib News Charities filed a 990-PF for tax years 2006, 2007, and 2008 (I have included tax year 2008 in the event that the foundation filed before the filing deadline). I understand that the organization is not required to file if it did not receive donations in excess of \$25,000. If the foundation has filed a 990-PF for 2006, 2007, or 2008, we would like to have a copy of the tax form(s). In the event that it takes several days, weeks, or months to receive the requested copies, it would be helpful to have an answer to the question whether the organization has filed and for what year(s) tax form(s) exist.

It is our understanding that the organization also does business as Carib News Foundation; however, Carib News Foundation is not found in Publication 78.

My telephone number is 202-225-9739 and my email is Elizabeth.horton@mail.house.gov. Thank you again for your help with this matter.

Sincerely,

Elizabeth Horton

Form 4506-A (Rev. January 2009) Department of the Treasury Internal Revenue Service	Request for Public Inspection or Copy of Exempt or Political Organization IRS Form	OMB No. 1545-0466
Type or print clearly. Request may be rejected if the form is incomplete or illegible.		

TIP You may not have to complete Form 4506-A to get the copies you need.

- Internet. Form 8871, Political Organization Notice of Section 527 Status, and Form 8872, Political Organization Report of Contributions and Expenditures, are available for inspection and printing from the Internet. The website address for both forms is www.irs.gov/polorgs.
- Public disclosure by the organization. Exempt or political organizations must make their returns, reports, notices, and exempt applications available for public inspection. You can visit the organization to inspect the material instead of requesting it from the IRS. The organization may be able to mail the copies to you.

1 Exempt or political organization. If a multiple request, please attach list of names, forms, and tax years.

Name CARIB NEWS CHARITIES	Employer identification number (if known) 13 3632050
Address 7 WEST 36th STREET, FLOOR 8	
City or town, state, and ZIP code NEW YORK, NY 10018	

2 Requester

Name OFFICE OF CONGRESSIONAL ETHICS	Contact person ELIZABETH HORTON
Address 1017 LONGWORTH BUILDING	
City or town, state, and ZIP code WASHINGTON, DC 20515	
Phone (202) 225-9739	
Date 3/31/09	

3 Category of requester: Commercial user Non-commercial scientific institution
 You must check a box. Educational institution Media All others

4 Reason for request. All requesters except for commercial users must provide an explanation of how the records will be used to avoid being charged the commercial rate. Attach additional sheets if necessary.

TO CONFIRM WHETHER FOUNDATION RECEIVED FUNDING IN TAX YEARS 2006, 2007, 2008

Lines 5-9. For each applicable form, check the box(es) for the item(s) you are requesting. You may request more than one form. For each form requested, check either the copy, inspection, or CD/DVD box and enter the specific tax year(s), as indicated. If ordering a partial set on CD/DVD, indicate the format, state(s), and month(s) requested.

5 Form 990, Form 990-EZ <input checked="" type="checkbox"/> Copy <input type="checkbox"/> Inspection Tax year(s) requested: _____	<input type="checkbox"/> CD/DVD Format: <input type="checkbox"/> Alchemy <input type="checkbox"/> Raw State(s): _____ Months: _____
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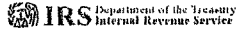
6 Form 990-PF <input checked="" type="checkbox"/> Copy <input type="checkbox"/> Inspection Tax year(s) requested: 2006, 2007, 2008 (if filed)	<input type="checkbox"/> CD/DVD Format: <input type="checkbox"/> Alchemy <input type="checkbox"/> Raw State(s): _____ Months: _____
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7 Form 990-T (501(c)(3) organizations filed after 8/17/2006) <input type="checkbox"/> Copy <input type="checkbox"/> Inspection Tax year(s) requested: _____	<input type="checkbox"/> CD/DVD Format: <input type="checkbox"/> Alchemy <input type="checkbox"/> Raw State(s): _____ Months: _____
---	---

8 Form 5227 <input type="checkbox"/> Copy <input type="checkbox"/> Inspection Tax year(s) requested: _____	9 Form 1023, 1024 or Determination Letter <input type="checkbox"/> Copy <input type="checkbox"/> Inspection Tax year(s) requested: _____
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IRS Use Only	
The form requested above was inspected by (name of requester)	IRS office where inspection was made
Signature of employee present at inspection	Date

09-2567 0104



OGDEN UT 84201-0058

OFFICE OF CONGRESSIONAL ETHICS
ATTN: ELIZABETH HORTON
1017 LONGWORTH BUILDING
WASHINGTON DC 20515

CUT OUT AND RETURN THE VOUCHER AT THE BOTTOM OF THIS PAGE IF YOU ARE MAKING A PAYMENT,
EVEN IF YOU ALSO HAVE AN INQUIRY.



The IRS address must appear in the window.

Use for payments

80DCD-TE

0412606945

Letter Number: LTR3983C

Letter Date : 2009-04-17

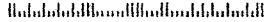
Tax Period : 000000



133632050

INTERNAL REVENUE SERVICE

OGDEN UT 84201-0058



OFFICE OF CONGRESSIONAL ETHICS


ATTN: ELIZABETH HORTON

1017 LONGWORTH BUILDING

WASHINGTON DC 20515

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09-2567 0105

 **IRS** DEPARTMENT OF THE TREASURY
Internal Revenue Service

OGDEN UT 84201-0058

In reply refer to: 0412606945
Apr. 17, 2009 LTR 3983C E1
13-3632050 000000 00 000
00027842
BDDC: TE

OFFICE OF CONGRESSIONAL ETHICS
ATTN: ELIZABETH HORTON
1017 LONGWORTH BUILDING
WASHINGTON DC 20515

Taxpayer Identification Number: 13-3632050
Organization: Carib News Charities, Inc.

Form(s): 990PF

Tax Period(s): May 31, 2006 May 31, 2007
May 31, 2008

Dear Requester:

We received your Mar. 31, 2009, request for a copy of the Form(s) 990PF relating to the organization(s) identified above. Enclosed is a copy of the form(s) you requested. We are unable to provide a copy of the form(s) requested for the following tax period(s):

May 31, 2006

We regret that we can not provide a photocopy of return(s) for the organization(s) and year(s) you requested. There are a variety of reasons why these returns are not available, for example:

- the organization may not be required to file the requested return because its gross receipts are \$25,000 or less.
- the organization may be included in a group ruling and the parent may have filed a group return.
- the organization may have received an extension of time to file.
- processing of the organization's return may not be complete.
- return(s) are destroyed after a certain number of tax years.
- the organization may not be required to file.

If you have any questions, please write us at the address shown at the top of the first page of this letter. Or, you may call us toll free at 1-877-829-5500.

Whenever you write, please include this letter and, in the spaces below, give us your telephone number with the hours we can reach you. Please keep a copy of this letter for your records.

Telephone Number () _____ Hours _____

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10055 AS ORG

Form **990-PF** **Return of Private Foundation or Section 4947(a)(1) Nonexempt Charitable Trust Treated as a Private Foundation** OMB No 1545-0052
 Department of the Treasury Internal Revenue Service **2005**
 Note: The organization may be able to use a copy of this return to satisfy state reporting requirements.
 For calendar year 2005, or tax year beginning June 1, 2005, and ending May 31, 2006
 G Check all that apply: Initial return Final return Amended return Address change Name change
 Use the IRS label: **Catb News Charities Inc** A Employer identification number: **13-3632050**
 Otherwise, print: **15 West 39th Street** B Telephone number (see page 10 of the instructions): **{ }**
 or type: **New York, NY 10018** C If exemption application is pending, check here
 See Specific Instructions: **New York, NY 10018** D 1. Foreign organizations, check here
 H Check type of organization: Section 501(c)(3) exempt private foundation 2. Foreign organizations meeting the 85% test, check here and attach computation
 Section 4947(a)(1) nonexempt charitable trust Other taxable private foundation
 I Fair market value of all assets at end of year (from Part II, col. (c), line 16) **9** J Accounting method: Cash Accrual Other (specify) _____ E If private foundation status was terminated under section 507(b)(1)(A), check here
 Other (specify) _____ F If the foundation is in a 60-month termination under section 507(b)(1)(B), check here

Part I Analysis of Revenue and Expenses (The total of amounts in columns (b), (d), and (f) may not necessarily equal the amounts in column (a) (see page 11 of the instructions))		(a) Revenue and expenses per books	(b) Net investment income	(c) Adjusted net income	(d) Disbursements for charitable purposes (cash basis only)
1	Contributions, gifts, grants, etc., received (attach schedule)	0			
2	Check <input type="checkbox"/> if the foundation is not required to attach Sch B				
3	Interest on savings and temporary cash investments				
4	Dividends and interest from securities				
5a	Gross rents				
b	Net rental income or (loss)				
6a	Net gain or (loss) from sale of assets not on line 10				
b	Gross sales price for all assets on line 6a				
7	Capital gain net income (from Part IV, line 2)				
8	Net short-term capital gain				
9	Income modifications				
10a	Gross sales less returns and allowances				
b	Less: Cost of goods sold				
c	Gross profit or (loss) (attach schedule)				
11	Other income (attach schedule)				
12	Total. Add lines 1 through 11				
13	Compensation of officers, directors, trustees, etc.				
14	Other employee salaries and wages				
15	Pension plans, employee benefits				
16a	Legal fees (attach schedule)				
b	Accounting fees (attach schedule)				
c	Other professional fees (attach schedule)				
17	Interest				
18	Taxes (attach schedule) (see page 14 of the instructions)				
19	Depreciation (attach schedule) and depletion				
20	Occupancy				
21	Travel, conferences, and meetings				
22	Printing and publications				
23	Other expenses (attach schedule)				
24	Total operating and administrative expenses. Add lines 13 through 23				
25	Contributions, gifts, grants paid				
26	Total expenses and disbursements. Add lines 24 and 25				
27	Subtract line 26 from line 12:				
a	Excess of revenue over expenses and disbursements				
b	Net investment income (if negative, enter -0-)				
c	Adjusted net income (if negative, enter -0-)				

RECEIVED IN CORR IRS - OSC 645 AUG 27 2007 OGDEN, UTAH 09-2567 0107

042320072200052007

SCANNED JAN 16 2008

6113 12

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Part II Balance Sheets		Attached schedules and amounts in the description column should be for end-of-year amounts only. (See instructions.)		
		Beginning of year (a) Book Value	End of year: (b) Book Value (c) Fair Market Value	
Assets	1	Cash—non-interest-bearing	0	0
	2	Savings and temporary cash investments		
	3	Accounts receivable		
		Less: allowance for doubtful accounts		
	4	Pledges receivable		
		Less: allowance for doubtful accounts		
	5	Grants receivable		
	6	Receivables due from officers, directors, trustees, and other disqualified persons (attach schedule) (see page 15 of the instructions)		
	7	Other notes and loans receivable (attach schedule)		
		Less: allowance for doubtful accounts		
	8	Inventories for sale or use		
	9	Prepaid expenses and deferred charges		
	10a	Investments—U S and state government obligations (attach schedule)		
	b	Investments—corporate stock (attach schedule)		
	c	Investments—corporate bonds (attach schedule)		
	11	Investments—land, buildings, and equipment basis		
	Less: accumulated depreciation (attach schedule)			
12	Investments—mortgage loans			
13	Investments—other (attach schedule)			
14	Land, buildings, and equipment: basis			
	Less: accumulated depreciation (attach schedule)			
15	Other assets (describe)			
16	Total assets (to be completed by all filers—see page 16 of the instructions. Also, see page 1, item i)	0	0	
Liabilities	17	Accounts payable and accrued expenses	0	0
	18	Grants payable		
	19	Deferred revenue		
	20	Loans from officers, directors, trustees, and other disqualified persons		
	21	Mortgages and other notes payable (attach schedule)		
	22	Other liabilities (describe)		
23	Total liabilities (add lines 17 through 22)	0	0	
Net Assets or Fund Balances	Organizations that follow SFAS 117, check here <input type="checkbox"/> and complete lines 24 through 26 and lines 30 and 31.			
	24	Unrestricted		
	25	Temporarily restricted		
	26	Permanently restricted		
	Organizations that do not follow SFAS 117, check here <input type="checkbox"/> and complete lines 27 through 31.			
	27	Capital stock, trust principal, or current funds		
	28	Paid-in or capital surplus, or land, bldg., and equipment fund		
	29	Retained earnings, accumulated income, endowment, or other funds		
30	Total net assets or fund balances (see page 17 of the instructions)	0	0	
31	Total liabilities and net assets/fund balances (see page 17 of the instructions)	0	0	

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Part III Analysis of Changes in Net Assets or Fund Balances			
1	Total net assets or fund balances at beginning of year—Part II, column (a), line 30 (must agree with end-of-year figure reported on prior year's return)	1	0
2	Enter amount from Part I, line 27a	2	
3	Other increases not included in line 2 (itemize)	3	
4	Add lines 1, 2, and 3	4	
5	Decreases not included in line 2 (itemize)	5	
6	Total net assets or fund balances at end of year (line 4 minus line 5)—Part II, column (b), line 30	6	0

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Part IV Capital Gains and Losses for Tax on Investment Income

(a) List and describe the kinds of property sold (e.g., real estate, 2-story brick warehouse, or common stock, 200 shares MLC Co.)	(b) How acquired P—Purchase D—Donation	(c) Date acquired (mo., day, yr.)	(d) Date sold (mo., day, yr.)
1a			
b			
c			
d			
e			

(e) Gross sales price	(f) Depreciation allowed (or allowable)	(g) Cost or other basis plus expense of sale	(h) Gain or (loss) (e) plus (f) minus (g)
a			
b			
c			
d			
e			

Complete only for assets showing gain in column (h) and owned by the foundation on 12/31/69

(i) FMV as of 12/31/69	(j) Adjusted basis as of 12/31/69	(k) Excess of col (i) over col (j), if any	(l) Gain (Col (h) gain minus col (k), but not less than -0-) or Losses (from col (h))
a			
b			
c			
d			
e			

2 Capital gain net income or (net capital loss) If gain, also enter in Part I, line 7
If (loss), enter -0- in Part I, line 8 **2**

3 Net short-term capital gain or (loss) as defined in sections 1222(S) and (6).
If gain, also enter in Part I, line 8, column (c) (see pages 13 and 17 of the instructions).
If (loss), enter -0- in Part I, line 8. **3**

Part V Qualification Under Section 4940(e) for Reduced Tax on Net Investment Income

(For optional use by domestic private foundations subject to the section 4940(a) tax on net investment income.)
If section 4940(d)(2) applies, leave this part blank.
Was the organization liable for the section 4942 tax on the distributable amount of any year in the base period? Yes No
If "Yes," the organization does not qualify under section 4940(e). Do not complete this part.

1 Enter the appropriate amount in each column for each year; see page 18 of the instructions before making any entries.

(a) Base period years Calendar year (or tax year beginning at)	(b) Adjusted qualifying distributions	(c) Net value of noncharitable-use assets	(d) Distribution ratio (col (b) divided by col (c))
2004			
2003			
2002			
2001			
2000			

2 Total of line 1, column (d) **2**

3 Average distribution ratio for the 5-year base period—divide the total on line 2 by 5, or by the number of years the foundation has been in existence if less than 5 years **3**

4 Enter the net value of noncharitable-use assets for 2005 from Part X, line 5. **4**

5 Multiply line 4 by line 3 **5**

6 Enter 1% of net investment income (1% of Part I, line 27b) **6**

7 Add lines 5 and 6 **7** **09-2567 0109**

8 Enter qualifying distributions from Part XII, line 4
If line 8 is equal to or greater than line 7, check the box in Part VI, line 1b, and complete that part using a 1% tax rate. See the Part VI instructions on page 18. **8**

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Part VI Excise Tax Based on Investment Income (Section 4940(a), 4940(b), 4940(e), or 4945—see page 18 of the instructions)

1a Exempt operating foundations described in section 4940(a)(2), check here [] and enter "N/A" on line 1.
Date of ruling letter: (attach copy of ruling letter if necessary—see instructions)
b Domestic organizations that meet the section 4940(e) requirements in Part V, check here [] and enter 1% of Part I, line 27b.
c All other domestic organizations enter 2% of line 27b. Exempt foreign organizations enter 4% of Part I, line 12, col (b).
2 Tax under section 511 (domestic section 4947(a)(1) trusts and taxable foundations only. Others enter -0-)
3 Add lines 1 and 2.
4 Subtitle A (income) tax (domestic section 4947(a)(1) trusts and taxable foundations only. Others enter -0-)
5 Tax based on investment income. Subtract line 4 from line 3. If zero or less, enter -0-
6 Credits/Payments.
a 2005 estimated tax payments and 2004 overpayment credited to 2005
b Exempt foreign organizations—tax withheld at source
c Tax paid with application for extension of time to file (Form 8868)
d Backup withholding erroneously withheld.
7 Total credits and payments. Add lines 6a through 6d.
8 Enter any penalty for underpayment of estimated tax. Check here [] if Form 2220 is attached.
9 Tax due. If the total of lines 5 and 8 is more than line 7, enter amount owed.
10 Overpayment. If line 7 is more than the total of lines 5 and 8, enter the amount overpaid.
11 Enter the amount of line 10 to be credited to 2005 estimated tax. Refunded

Part VII-A Statements Regarding Activities

1a During the tax year, did the organization attempt to influence any national, state, or local legislation or did it participate or intervene in any political campaign?
b Did it spend more than \$100 during the year (either directly or indirectly) for political purposes (see page 19 of the instructions for definition)?
If the answer is "Yes" to 1a or 1b, attach a detailed description of the activities and copies of any materials published or distributed by the organization in connection with the activities.
c Did the organization file Form 1120-POL for this year?
d Enter the amount (if any) of tax on political expenditures (section 4955) imposed during the year:
(1) On the organization \$
(2) On organization managers \$
e Enter the reimbursement (if any) paid by the organization during the year for political expenditure tax imposed on organization managers \$
2 Has the organization engaged in any activities that have not previously been reported to the IRS?
If "Yes," attach a detailed description of the activities.
3 Has the organization made any changes, not previously reported to the IRS, in its governing instrument, articles of incorporation, or bylaws, or other similar instruments? If "Yes," attach a conformed copy of the changes
4a Did the organization have unrelated business gross income of \$1,000 or more during the year?
b If "Yes," has it filed a tax return on Form 990-T for this year?
5 Was there a liquidation, termination, dissolution, or substantial contraction during the year?
If "Yes," attach the statement required by General Instruction T.
6 Are the requirements of section 508(e) (relating to sections 4941 through 4945) satisfied either:
• By language in the governing instrument, or
• By state legislation that effectively amends the governing instrument so that no mandatory directions that conflict with the state law remain in the governing instrument?
7 Did the organization have at least \$5,000 in assets at any time during the year? If "Yes," complete Part II, col (c), and Part XV.
8a Enter the states to which the foundation reports or with which it is registered (see page 18 of the instructions)
b If the answer is "Yes" to line 7, has the organization furnished a copy of Form 990-PF to the Attorney General (or designate) of each state as required by General Instruction G? If "No," attach explanation
9 Is the organization claiming status as a private operating foundation within the meaning of section 4942(j)(3) or 4942(j)(5) for calendar year 2005 or the taxable year beginning in 2005 (see instructions for Part XIV on page 26)? If "Yes," complete Part XIV
10 Did any persons become substantial contributors during the tax year? If "Yes," attach a schedule listing their names and addresses.
11 Did the organization comply with the public inspection requirements for its annual returns and exemption application?
Web site address
12 The books are in care of Telephone no.
Located at ZIP+4
13 Section 4947(a)(1) nonexempt charitable trusts filing Form 990-PF in lieu of Form 1041—Check here and enter the amount of tax-exempt interest received or accrued during the year

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Part VII-B Statements Regarding Activities for Which Form 4720 May Be Required

File Form 4720 if any item is checked in the "Yes" column, unless an exception applies.

	Yes	No
1a During the year did the organization (either directly or indirectly):		
(1) Engage in the sale or exchange, or leasing of property with a disqualified person? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(2) Borrow money from, lend money to, or otherwise extend credit to (or accept it from) a disqualified person? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(3) Furnish goods, services, or facilities to (or accept them from) a disqualified person? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(4) Pay compensation to, or pay or reimburse the expenses of, a disqualified person? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(5) Transfer any income or assets to a disqualified person (or make any of either available for the benefit or use of a disqualified person)? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(6) Agree to pay money or property to a government official? (Exception. Check "No" if the organization agreed to make a grant to or to employ the official for a period after termination of government service, if terminating within 90 days.) <input type="checkbox"/> Yes <input type="checkbox"/> No		
b If any answer is "Yes" to 1a(1)-(6), did any of the acts fail to qualify under the exceptions described in Regulations section 53.4941(d)-3 or in a current notice regarding disaster assistance (see page 20 of the instructions)? Organizations relying on a current notice regarding disaster assistance check here <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	1b	X
c Did the organization engage in a prior year in any of the acts described in 1a, other than excepted acts, that were not corrected before the first day of the tax year beginning in 2005? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	1c	X
2 Taxes on failure to distribute income (section 4942) (does not apply for years the organization was a private operating foundation defined in section 4942(b)(3) or 4942(b)(5)):		
a At the end of tax year 2005, did the organization have any undistributed income (lines 6d and 6e, Part XIII) for tax year(s) beginning before 2005? <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes," list the years ▶ 20....., 20....., 20....., 20.....		
b Are there any years listed in 2a for which the organization is not applying the provisions of section 4942(a)(2) (relating to incorrect valuation of assets) to the year's undistributed income? (If applying section 4942(a)(2) to all years listed, answer "No" and attach statement—see page 20 of the instructions.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2b	X
c If the provisions of section 4942(a)(2) are being applied to any of the years listed in 2a, list the years here. ▶ 20....., 20....., 20....., 20.....		
3a Did the organization hold more than a 2% direct or indirect interest in any business enterprise at any time during the year? <input type="checkbox"/> Yes <input type="checkbox"/> No		
b If "Yes," did it have excess business holdings in 2005 as a result of (1) any purchase by the organization or disqualified persons after May 26, 1969; (2) the lapse of the 5-year period (or longer period approved by the Commissioner under section 4943(c)(1)) to dispose of holdings acquired by gift or bequest; or (3) the lapse of the 10-, 15-, or 20-year first phase holding period? (Use Schedule C, Form 4720, to determine if the organization had excess business holdings in 2005.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	3b	X
4a Did the organization invest during the year any amount in a manner that would jeopardize its charitable purposes? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	4a	X
b Did the organization make any investment in a prior year (but after December 31, 1959) that could jeopardize its charitable purpose that had not been removed from jeopardy before the first day of the tax year beginning in 2005? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	4b	X
5a During the year did the organization pay or incur any amount to:		
(1) Carry on propaganda, or otherwise attempt to influence legislation (section 4945(e))? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(2) Influence the outcome of any specific public election (see section 4955); or to carry on, directly or indirectly, any voter registration drive? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(3) Provide a grant to an individual for travel, study, or other similar purposes? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(4) Provide a grant to an organization other than a charitable, etc., organization described in section 509(a)(1), (2), or (3), or section 4940(d)(2)? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(5) Provide for any purpose other than religious, charitable, scientific, literary, or educational purposes, or for the prevention of cruelty to children or animals? <input type="checkbox"/> Yes <input type="checkbox"/> No		
b If any answer is "Yes" to 5a(1)-(5), did any of the transactions fail to qualify under the exceptions described in Regulations section 53.4945 or in a current notice regarding disaster assistance (see page 20 of the instructions)? Organizations relying on a current notice regarding disaster assistance check here <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	5b	X
c If the answer is "Yes" to question 5a(4), does the organization claim exemption from the tax because it maintained expenditure responsibility for the grant? <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes," attach the statement required by Regulations section 53.4945-5(c).		
6a Did the organization, during the year, receive any funds, directly or indirectly, to pay premiums on a personal benefit contract? <input type="checkbox"/> Yes <input type="checkbox"/> No		
b Did the organization, during the year, pay premiums, directly or indirectly, on a personal benefit contract? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If you answered "Yes" to 6b, also file Form 8870	6b	X

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Part VIII Information About Officers, Directors, Trustees, Foundation Managers, Highly Paid Employees, and Contractors

1 List all officers, directors, trustees, foundation managers and their compensation (see page 21 of the instructions).

Table with 5 columns: (a) Name and address, (b) Title and average hours per week devoted to position, (c) Compensation, (d) Contributions to employee benefit plans and deferred compensation, (e) Expense account, other allowances.

2 Compensation of five highest-paid employees (other than those included on line 1—see page 21 of the instructions). If none, enter "NONE."

Table with 5 columns: (a) Name and address of each employee paid more than \$50,000, (b) Title and average hours per week devoted to position, (c) Compensation, (d) Contributions to employee benefit plans and deferred compensation, (e) Expense account, other allowances. Handwritten 'NONE' in row 1.

Total number of other employees paid over \$50,000

3 Five highest-paid independent contractors for professional services—(see page 21 of the instructions). If none, enter "NONE."

Table with 3 columns: (a) Name and address of each person paid more than \$50,000, (b) Type of service, (c) Compensation. Handwritten 'NONE' in row 1.

Total number of others receiving over \$50,000 for professional services

Part IX-A Summary of Direct Charitable Activities

Table with 2 columns: Description of activities, Expenses. Rows 1-4.

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Part IX-B Summary of Program-Related Investments (see page 22 of the instructions)

Describe the five largest program-related investments made by the foundation during the tax year on lines 1 and 2

	Amount
1	
2	
All other program-related investments. See page 22 of the instructions.	
3	
Total. Add lines 1 through 3.	

Part X Minimum Investment Return (All domestic foundations must complete this part. Foreign foundations, see page 22 of the instructions.)

1	Fair market value of assets not used (or held for use) directly in carrying out charitable, etc., purposes:	
a	Average monthly fair market value of securities	1a
b	Average of monthly cash balances	1b
c	Fair market value of all other assets (see page 23 of the instructions)	1c
d	Total (add lines 1a, b, and c)	1d
e	Reduction claimed for blockage or other factors reported on lines 1a and 1c (attach detailed explanation)	1e
2	Acquisition indebtedness applicable to line 1 assets	2
3	Subtract line 2 from line 1d	3
4	Cash deemed held for charitable activities. Enter 1 1/2% of line 3 (if greater amount, see page 23 of the instructions)	4
5	Net value of noncharitable-use assets. Subtract line 4 from line 3. Enter here and on Part V, line 4	5
6	Minimum investment return. Enter 5% of line 5	6

Part XI Distributable Amount (see page 23 of the instructions) (Section 4942(f)(3) and (f)(5) private operating foundations and certain foreign organizations check here and do not complete this part.)

1	Minimum investment return from Part X, line 6	1
2a	Tax on investment income for 2005 from Part VII, line 5	2a
2b	Income tax for 2005. (This does not include the tax from Part VI.)	2b
c	Add lines 2a and 2b	2c
3	Distributable amount before adjustments. Subtract line 2c from line 1	3
4	Recoveries of amounts treated as qualifying distributions	4
5	Add lines 3 and 4	5
6	Deduction from distributable amount (see page 24 of the instructions)	6
7	Distributable amount as adjusted. Subtract line 6 from line 5. Enter here and on Part XIII, line 1	7

Part XII Qualifying Distributions (see page 24 of the instructions)

1	Amounts paid (including administrative expenses) to accomplish charitable, etc., purposes:	
a	Expenses, contributions, gifts, etc.—total from Part I, column (d), line 26	1a
b	Program-related investments—total from Part IX-B	1b
2	Amounts paid to acquire assets used (or held for use) directly in carrying out charitable, etc., purposes	2
3	Amounts set aside for specific charitable projects that satisfy the:	
a	Suitability test (prior IRS approval required)	3a
b	Cash distribution test (attach the required schedule)	3b
4	Qualifying distributions. Add lines 1a through 3b. Enter here and on Part V, line 8, and Part XIII, line 4	4
5	Organizations that qualify under section 4940(e) for the reduced rate of tax on net investment income. Enter 1% of Part I, line 27b (see page 24 of the instructions)	5
6	Adjusted qualifying distributions. Subtract line 5 from line 4	6

Note: The amount on line 6 will be used in Part V, column (b), in subsequent years when calculating whether the foundation qualifies for the section 4940(e) reduction of tax in those years.

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Part XIII Undistributed Income (see page 24 of the instructions)

	(a) Corpus	(b) Years prior to 2004	(c) 2004	(d) 2005
1 Distributable amount for 2005 from Part XI, line 7				
2 Undistributed income, if any, as of the end of 2004:				
a Enter amount for 2004 only				
b Total for prior years: 20____, 20____, 20____				
3 Excess distributions carryover, if any, to 2005:				
a From 2000				
b From 2001				
c From 2002				
d From 2003				
e From 2004				
f Total of lines 3a through e				
4 Qualifying distributions for 2005 from Part XII, line 4: ▶ \$ _____				
a Applied to 2004, but not more than line 2a				
b Applied to undistributed income of prior years (Election required—see page 25 of the instructions)				
c Treated as distributions out of corpus (Election required—see page 25 of the instructions)				
d Applied to 2005 distributable amount				
e Remaining amount distributed out of corpus				
5 Excess distributions carryover applied to 2005 (If an amount appears in column (d), the same amount must be shown in column (a).)				
6 Enter the net total of each column as indicated below:				
a Corpus. Add lines 3f, 4c, and 4e. Subtract line 5				
b Prior years' undistributed income. Subtract line 4b from line 2b				
c Enter the amount of prior years' undistributed income for which a notice of deficiency has been issued, or on which the section 4942(a) tax has been previously assessed				
d Subtract line 6c from line 6b. Taxable amount—see page 25 of the instructions				
e Undistributed income for 2004. Subtract line 4a from line 2a. Taxable amount—see page 25 of the instructions				
f Undistributed income for 2005. Subtract lines 4d and 5 from line 1. This amount must be distributed in 2006				
7 Amounts treated as distributions out of corpus to satisfy requirements imposed by section 170(b)(1)(E) or 4942(g)(3) (see page 25 of the instructions)				
8 Excess distributions carryover from 2000 not applied on line 5 or line 7 (see page 25 of the instructions)				
9 Excess distributions carryover to 2006. Subtract lines 7 and 8 from line 6a				
10 Analysis of line 9:				
a Excess from 2001				
b Excess from 2002				
c Excess from 2003				
d Excess from 2004				
e Excess from 2005				

09-2567 0114

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Part XIV Private Operating Foundations (see page 26 of the instructions and Part VII-A, question 9)

1a If the foundation has received a ruling or determination letter that it is a private operating foundation, and the ruling is effective for 2005, enter the date of the ruling

b Check box to indicate whether the organization is a private operating foundation described in section 4942(j)(3) or 4942(j)(5)

2a Enter the lesser of the adjusted net income from Part I or the minimum investment return from Part X for each year listed

	Tax year		Prior 3 years		(e) Total
	(a) 2005	(b) 2004	(c) 2003	(d) 2002	
b 85% of line 2a					
c Qualifying distributions from Part XII, line 4 for each year listed					
d Amounts included in line 2c not used directly for active conduct of exempt activities					
e Qualifying distributions made directly for active conduct of exempt activities. Subtract line 2d from line 2c					
3 Complete 3a, b, or c for the alternative test relied upon.					
a "Assets" alternative test—enter:					
(1) Value of all assets					
(2) Value of assets qualifying under section 4942(j)(3)(B)(i)					
b "Endowment" alternative test—enter 1/2 of minimum investment return shown in Part X, line 6 for each year listed					
c "Support" alternative test—enter:					
(1) Total support other than gross investment income (interest, dividends, rents, payments on securities loans (section 512(a)(5)), or royalties)					
(2) Support from general public and 5 or more exempt organizations as provided in section 4942(j)(3)(B)(ii)					
(3) Largest amount of support from an exempt organization					
(4) Gross investment income					

Part XV Supplementary Information (Complete this part only if the organization had \$5,000 or more in assets at any time during the year—see page 26 of the instructions.)

1 Information Regarding Foundation Managers:

a List any managers of the foundation who have contributed more than 2% of the total contributions received by the foundation before the close of any tax year (but only if they have contributed more than \$5,000). (See section 507(d)(2).)

b List any managers of the foundation who own 10% or more of the stock of a corporation (or an equally large portion of the ownership of a partnership or other entity) of which the foundation has a 10% or greater interest.

2 Information Regarding Contribution, Grant, Gift, Loan, Scholarship, etc., Programs:

Check here if the organization only makes contributions to preselected charitable organizations and does not accept unsolicited requests for funds. If the organization makes gifts, grants, etc. (see page 26 of the instructions) to individuals or organizations under other conditions, complete items 2a, b, c, and d.

a The name, address, and telephone number of the person to whom applications should be addressed:

b The form in which applications should be submitted, and information and materials they should include:

c Any submission deadlines: **09-2567 0115**

d Any restrictions or limitations on awards, such as by geographical areas, charitable fields, kinds of institutions, or other factors:

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Part XV Supplementary Information (continued)

3 Grants and Contributions Paid During the Year or Approved for Future Payment

Recipient	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
a Paid during the year				
Total				3a
b Approved for future payment				
Total				3b

100266972

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Part XVIII Information Regarding Transfers To and Transactions and Relationships With Noncharitable Exempt Organizations

1 Did the organization directly or indirectly engage in any of the following with any other organization described in section 501(c) of the Code (other than section 501(c)(3) organizations) or in section 527, relating to political organizations?
a Transfers from the reporting organization to a noncharitable exempt organization of:
(1) Cash
(2) Other assets
b Other transactions:
(1) Sales of assets to a noncharitable exempt organization
(2) Purchases of assets from a noncharitable exempt organization
(3) Rental of facilities, equipment, or other assets
(4) Reimbursement arrangements
(5) Loans or loan guarantees
(6) Performance of services or membership or fundraising solicitations
c Sharing of facilities, equipment, mailing lists, other assets, or paid employees
d If the answer to any of the above is "Yes," complete the following schedule. Column (b) should always show the fair market value of the goods, other assets, or services given by the reporting organization. If the organization received less than fair market value in any transaction or sharing arrangement, show in column (d) the value of the goods, other assets, or services received.

Table with 4 columns: (a) Line no, (b) Amount involved, (c) Name of noncharitable exempt organization, (d) Description of transfers, transactions, and sharing arrangements. Includes handwritten number 100266972.

2a Is the organization directly or indirectly affiliated with, or related to, one or more tax-exempt organizations described in section 501(c) of the Code (other than section 501(c)(3)) or in section 527?
b If "Yes," complete the following schedule.

Table with 3 columns: (a) Name of organization, (b) Type of organization, (c) Description of relationship.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than taxpayer or fiduciary) is based on all information of which preparer has any knowledge.

Sign Here section containing Signature of officer or trustee, Date, Title, Preparer's signature, Date, Check if self-employed, Preparer's SSN or PTIN, Firm's name, address, and ZIP code, EIN, and Phone no.

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Search for Charities, Online Version of Publication 78 Search Results

Organization

Name Includes

Carib Charities

At least one of the words
All of the words

Location

City

State All...

Country USA

Deductibility Code

Deductibility Code All...

Search

Begin New Search

Search Tips

Show 25 [OK] « Prev | 1-1 | Next »

Name ▲

Carib News Charities Inc.

City	State	Country	Code
New York	NY	USA	4

« Prev | 1-1 | Next »

09-2567 0118.1

**Deductibility Code**

Publication 78 uses a coding system to identify each organization listed by type and limitation on deductibility of charitable contributions to the organization. The code(s) displayed depend(s) on the code for which the organization qualifies. In cases where an organization has multiple deductibility codes, only the definition for each applicable deductibility code is displayed.

Code	Meaning
4	A private foundation, generally with a 30% deductibility limitation.

Close

09-2567 0118.2

Exhibit 9

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re: Representative of IBM, Vice President Market Development, IBM
Review #: 09-2567; 09-4403; 09-3698; 09-6333; 09-2222
Date: May 8, 2009
Location: IBM Offices, Washington, D.C.
Participants: Leo Wise
Beth Horton
Lisa Palluconi, Counsel for Government Programs for IBM
Adrienne G. Rhone, Director Governmental Programs

Summary: The Representative of IBM is the Vice President of Market Development for IBM. She was interviewed pursuant to Reviews 09-2567; 09-4403; 09-3698; 09-6333; and 09-2222. The Representative of IBM helped arrange IBM's participation at the 13th Annual Caribbean Multinational Business Conference in 2008; she also participated at the event. We requested an interview with the Representative of IBM and she consented to an interview. The Representative of IBM made the following statements in response to our questioning:

1. The Representative of IBM was given an 18 U.S.C. § 1001 warning and she signed a written acknowledgement of the warning.
2. She attended the 13th Annual Caribbean Multinational Business Conference in 2008.
3. She attended the conference to extend IBM to areas that were not currently being served. She focuses on the Caribbean because of her division at IBM which is women and minorities. The Caribbean is an underdeveloped business unit for IBM.

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4. She first attended the conference in 2004, as a participant, to see if the conference would be a good fit for IBM to participate at as a sponsor.
5. IBM was an entry level sponsor in '05.
6. She dealt with Faye Rodney on conference matters.
7. After her attendance in '05, she received a thank you letter signed by the Rodneys that asked IBM to be a sponsor at the '06 conference.
8. IBM participated at the '05, '06, '07 and '08 conference.
9. The Rodneys continued their prior practice and sent a thank you letter with a request for sponsorship after the '07 conference for IBM to participate at the '08 conference.
10. The letter was sent to the Operations Executive and the decision to participate was decided as a team. Colin Ward, with ENI Systems, is one of IBM's business partners who also went to the conference.
11. The letter is the first communication regarding the conference.
12. After the letter is received, the team manager negotiates participation at the conference. Negotiations included timing of sessions (day/time). She requested Friday, right before or right after lunch, for the IBM session. It was important to have attendance by individuals interested in technology.
13. She also agreed to moderate the women's breakfast sponsored by Macy's.
14. The team manager would have worked with the Rodneys regarding the break-out sessions.
15. IBM controlled its own content for the session(s).
16. The first year IBM sponsored the conference, the sponsorship level was \$10,000. IBM sponsored the conference the following year at \$15,000, and in '08 the sponsorship went up to \$20,000 after IBM received a request from Faye Rodney for an increase. The Representative of IBM initially counter-offered \$18,000 but agreed to the \$20,000 at the urging of Ms. Rodney.
17. IBM has a methodical way of approving conference sponsorships. The letter from the Rodneys was received in July.

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18. She approved the check for the purchase order and released the check. Carib would have received the check in August or September.
19. After the check is released, she and the business partner collaborate on the content of session.
20. She and the business partner attended the conference.
21. She has only seen the Rodneys at the conference. She has been invited to other events but has not accepted the invitations.
22. She received a call from Mr. Rodney about the article on the conference.
23. She had no knowledge of the Foundation until this matter.
24. She understood Carib News to be the sponsor.
25. The \$20,000 level of sponsorship is low for IBM in general. However, it is worth the presence and branding for small the small business unit practice.
26. She thought IBM's sponsorship was of the conference, she did not know the Foundation existed until this issue arose. Her department does not give to non-profit organizations, only to businesses.
27. The only parameters placed on the money for the conference was with respect to time slots and length of the sessions.
28. She tells her team her preferences and the team works out the specifics with Carib.
29. She does not recall seeing a specific document that listed the various levels of sponsorship.
30. Carib News provides the framework for the conference. Then she typically tells Carib what she wants and what they will pay. She was aware from the signage that other companies were larger sponsors.
31. She arrived at the conference on Thursday and attended the opening reception. She attended a reception on Friday that was hosted by Citi and a breakout session.
32. She noticed names of entities on the agenda from the web that she knew were not at the conference.

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33. She noted that the agenda also listed her breakout session on Saturday which was inaccurate. Her session was on Friday, so she knew the agenda could not have been the final agenda.
34. She seemed to recall seeing the agenda that was submitted to Standards. She noted that the 12:00pm session was accurate, but that she did not believe that the breakout listed on Saturday was accurate.
35. She attended the Macy's breakfast on Saturday morning because it is a popular event. She noted who was on the breakfast panel and who was not (names were listed on agenda). Michelle Patterson did not speak, Burnice Johnson was not on the panel and she was not sure if she even attended the conference.
36. She saw several of the Members who attended the conference. She was on the same flight as Representative Payne. She spoke to Representative Rangel at the reception. Representative Kilpatrick was on a panel with her. And Representative Thompson road to an off-sight event with her. She was sure that she spoke to Delegate Christensen. And she spoke to Sheila Jackson Lee at the awards night.
37. The off-sight event was held at a separate hotel, it included local talent and a comedienne.
38. She stated that Members did not attend the breakout sessions.
39. She had a conversation with Rep. Thompson regarding the election.
40. She left the conference on Sunday morning by 7:00am.
41. She spoke with her team after the article regarding the conference came out.
42. She also called Mr. Rodney after she saw the article; she stated that he told her that there was an investigation and assured her that he had done all that he was supposed to do and that he wanted to keep her as a sponsor.
43. She understood sponsor to be financial sponsor of the conference. She assumed all of the companies whose logos appeared on the banner were sponsors. She assumed Carib News organized the conference.
44. She was not aware of how funding for the conference was handled. She assumed the payment from IBM went to pay for her breakout session and collateral expenses for the session.

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45. Her registration fee was part of the sponsorship. She paid for her room and all travel costs.
46. There were less than 300 people at the conference.
47. When she registered for the conference, she received a badge that allowed access to buffets during the meetings.
48. The registration fee for the conference in '05 was \$750.00.
49. She was not aware of the '08 registration fee.

Beth Horton
Investigative Counsel

OFFICE OF CONGRESSIONAL ETHICS
U.S. HOUSE OF REPRESENTATIVES

18 U.S.C. § 1001 ACKNOWLEDGEMENT

I have been provided with a copy of the text of section 1001 of title 18, United States Code (popularly known as the false Statements Act) and hereby acknowledge that it applies to any testimony or documents I provide to the Office of Congressional Ethics.

Name: _____

Signature: _____

Date: 5/8/08

For Office Use:
Review(s) No. _____

Exhibit 10

Susan A. Sullivan
Verizon Foundation
Director - Strategic Planning & Partnerships



Verizon Foundation
One Verizon Way
Bldg 6, 3rd Flr South
Basking Ridge, NJ 07920

November 25, 2008

Mr. Karl B. Rodney
Chairman & CEO
Carib News Charities, Inc.
7 West 36th Street, 8th Floor
New York, NY 10018

Dear Mr. Rodney:

On behalf of the Verizon Foundation, it is a pleasure to present the enclosed check for \$35,000.00 to Carib News Charities, Inc. in support of the 13th Annual Carib News Multi-National Business Conference - November 6-9, 2008.

Under the Omnibus Budget Reconciliation Act of 1993, Verizon Communications must receive a written receipt from all organizations to which it makes a charitable contribution. Therefore, please complete and return the enclosed form acknowledging this gift within two weeks of receipt.

Verizon Foundation is delighted to support Carib News Charities, Inc. and we wish to thank you and the organization for your dedication and contribution to our communities.

Please recognize our contribution as coming from "Verizon Communications."

Sincerely,

A handwritten signature in cursive script that reads "Susan Sullivan".

SS/ah

Enclosures

cc: Patrick Gaston
Albert Browne

09-2567 0127

VZ-OCE 0001


INVOICE NUMBER	INVOICE DATE	DESCRIPTION	GROSS	DISCOUNT	NET AMOUNT		
D0304421-00003064	11/17/2008	005-13TH ANNUAL MULTI-NATIONAL	35,000.00		35,000.00		
Check No.	Check Date	Vendor No.	Handling Code	Total	\$35,000.00	0.00	\$35,000.00
0002756	11/21/2008	0000511038	FN				


Questions? Call 916/357-3270 BU APCRP

PAGE 1 of 1

FOLD ALONG PERFORATED DOTTED LINE & REMOVE CHECK

THIS DOCUMENT CONTAINS MULTIPLE FRAUD DETERRENT SECURITY FEATURES - SEE REVERSE


 Verizon
 P.O. Box 2200
 Folsom, CA 95708-2200


 Wachovia Bank, National Association
 Chapel Hill, NC 27514

Date 11/21/2008
 0002756
 66-188
 531

Thirty five thousand and 00/100 Dollars
 PAY CARIB NEWS CHARITIES, INC.
 7 WEST 36TH STREET, 8TH FLR.
 NEW YORK, New York 10018

\$ 35,000.00

Catherine J. White
 VOID SIX MONTHS AFTER ISSUE DATE

#0002756# 105310156142079900572609#

SEE REVERSE SIDE FOR OPENING INSTRUCTIONS


 Verizon
 P.O. Box 2200
 Folsom, CA 95708-2200

PRE-SORTED
 FIRST-CLASS MAIL
 U.S. POSTAGE PAID
 SACRAMENTO, CA
 PERMIT NO. 99

CARIB NEWS CHARITIES, INC.
 7 WEST 36TH STREET, 8TH FLR.
 NEW YORK, New York 10018

09-2567 0128

VZ-OCE 0002

Acknowledgment of Charitable Contribution

IMPORTANT: Please acknowledge the enclosed charitable contribution by completing and returning this form. Donors cannot deduct contributions unless they are acknowledged in this manner and a failure to return this form in a timely manner may make you ineligible for future contributions by Verizon Foundation.

1. I hereby acknowledge the Verizon Foundation 2008 contribution of:
\$35,000.00

for 13th Annual Multi-National Business Conference - November 6-9, 2008.

(or describe property or services other than money received)

Received on (date): _____ Date of check: 11/21/08

2. Please indicate whether or not any goods or services were provided by your organization in consideration for this contribution (e.g., the value of food, beverage, ticket or entertainment at a fundraising event):
_____ Yes _____ No

If YES, please describe what was provided and give a good faith estimate of the value to the goods or services, understanding that the amount of the contribution that is deductible as a charitable contribution is limited to the excess of money and the value of property contributed over the value of the goods and services provided by the charity.

Description: _____ Est. Value: \$ _____

3. The information above is provided for the purpose of complying with IRS reporting requirements and is accurate to the best of my knowledge. I understand that penalties may be imposed by the IRS on charities that fail to make the required disclosure or for making a disclosure that is inaccurate or incomplete.

Name: _____

Title: _____

Organization: Carib News Charities, Inc.

Organization Tax I.D.#: 133632050vz

Signature: _____

Date: _____

Please return to:

Anita Coleman-Hunt
Verizon Foundation One Verizon Way, VC638427
Basking Ridge, NJ 07820

Telephone: 908-559-3516
Fax: 908-630-2660

09-2567 0129

VZ-OCE 0003

Acknowledgment of Charitable Contribution

IMPORTANT: Please acknowledge the enclosed charitable contribution by completing and returning this form. Donors cannot deduct contributions unless they are acknowledged in this manner and a failure to return this form in a timely manner may make you ineligible for future contributions by Verizon Foundation.

1. I hereby acknowledge the Verizon Foundation 2008 contribution of:
\$35,000.00
for 13th Annual Multi-National Business Conference - November 8-9, 2008.

(or describe property or services other than money received)

Received on (date): 11/26/08 Date of check: 11/21/08

2. Please indicate whether or not any goods or services were provided by your organization in consideration for this contribution (e.g., the value of food, beverage, ticket or entertainment at a fundraising event):
 Yes No

If YES, please describe what was provided and give a good faith estimate of the value to the goods or services, understanding that the amount of the contribution that is deductible as a charitable contribution is limited to the excess of money and the value of property contributed over the value of the goods and services provided by the charity.

Description: Registration + Conference Meal Plan Est. Value: \$ 1300.00

3. The information above is provided for the purpose of complying with IRS reporting requirements and is accurate to the best of my knowledge. I understand that penalties may be imposed by the IRS on charities that fail to make the required disclosure or for making a disclosure that is inaccurate or incomplete.

Name: KARL B. RODNEY
Title: PUBLISHER/CEO
Organization: Carib News Charities, Inc.
Organization Tax I.D.#: 133632850vz

Signature:  Date: 12/3/08

Please return to:
Anita Coleman-Hunt
Verizon Foundation One Verizon Way, VC63S427
Basking Ridge, NJ 07920

Telephone: 908-569-3518
Fax: 908-630-2660

09-2567 0130

VZ-OCE 0004

Exhibit 11

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re: Representative 1 of the Verizon Foundation
Review #: 09-2567; 09-4403; 09-3698; 09-6333; 09-2222
Date: March 23, 2009
Location: Verizon Offices, Washington, DC
Participants: Leo Wise
Omar Ashmawy
Beth Horton
David Kass, Assistant General Counsel Compliance
James C. Wilson, Vice President and Associate General Counsel Compliance

Summary: Representative 1 of the Verizon Foundation is the President and the Strategic Director for Philanthropy of the Verizon Foundation. He was interviewed pursuant to Reviews 09-2567; 09-4403; 09-3698; 09-6333; and 09-2222. Representative 1 of the Verizon Foundation participated at the 13th Annual Caribbean Multinational Business Conference in 2008. We requested an interview with Representative 1 of the Verizon Foundation and he consented to an interview. Representative 1 of the Verizon Foundation made the following statements in response to our questioning:

1. Representative 1 of the Verizon Foundation was given an 18 U.S.C. § 1001 warning, signed a written acknowledgement of the warning
2. Representative 1 of the Verizon Foundation is currently the President of the Verizon Foundation ("the Foundation") and Strategic Director for Philanthropy. His duties

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involve budget planning and implementation and governance for the foundation.

Representative 1 of the Verizon Foundation has significant decision-making authority over grants issued by the foundation. He approves all grants in excess of \$25,000 and all grants funded more than two years in a row. He has been with the foundation and acting as President for the past five years.

3. The Foundation is funded through a corpus donated by Verizon and through public donations under Verizon Reads, a program that is offered as part of customer billing statements. The Foundation approves approximately 2,900 grants (totaling 67 million) through a competitive loan application process. The Foundation's online loan application process has specific approval requirements, including a quarterly "impact report."
4. The Foundation funded the Carib News Foundation for the first time in 2008, the grant was issued to provide funding for the 13th Annual Caribbean Multinational Business Conference ("the Conference"). Representative 1 of the Verizon Foundation approved the Carib News Foundation grant. Representative 2 of the Verizon Foundation was the Foundation's contact person for the Conference. Representative 1 of the Verizon Foundation did not interact with Karl Rodney or anyone at Carib News regarding the Foundation's participation at the Conference. Both Representative 1 of the Verizon Foundation and Representative 2 of the Verizon Foundation attended the conference. Mr. Rodney invited Representative 1 of the Verizon Foundation to speak at the Conference and subsequently applied for a grant from the Foundation.
5. Representative 1 of the Verizon Foundation and Mr. Rodney are both members of the board of the Foundation for the University of the West Indies. The two men interacted at board meetings four times per year. Representative 1 of the Verizon Foundation stated that he may also have spoken to Mr. Rodney 1-2 other times prior to the Conference regarding how the Foundation could showcase its Thinkfinity program. He also stated that he may have spoken to Mr. Rodney once after receiving his letter of invitation for the Conference. He does not recall Mr. Rodney "pitching" the conference to him. Representative 1 of the Verizon Foundation stated that the Foundation would not have participated at the Conference unless he could speak on educational issues. Representative 1 of the Verizon Foundation believed the Conference would be a good opportunity to showcase the Foundation's Thinkfinity program.
6. Mr. Rodney was aware of the Foundation's educational work through his interaction with Representative 1 of the Verizon Foundation at board meetings for the Foundation of the University of West Indies. Representative 1 of the Verizon Foundation stated that while

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he had spoken with Mr. Rodney regarding the Thinkfinity program, he did not make any type of informal commitment to fund the Conference.

7. Representative 1 of the Verizon Foundation believed that there were three levels of sponsorship for the Conference, the highest being \$50,000 and the lowest being \$25,000. However, he does not recall seeing any specific document(s) setting out the different levels of sponsorship. He stated that he was not interested in sponsorship at the \$50,000 level but later decided on a \$35,000 grant donation. When asked what the Foundation received at the Conference for the \$35,000, Representative 1 of the Verizon Foundation stated signage and visibility. Representative 1 of the Verizon Foundation stated that the Foundation often provides such support for conferences, including the NAACP conference and National Urban League Conference.
8. Representative 1 of the Verizon Foundation was provided 3 venues at the Conference to speak about the Thinkfinity program. The Foundation believed participation at the Conference would provide exposure to English speaking Caribbean individuals who have connections to universities in New York.
9. The Foundation is required to issue grants only to 501(c)(3) entities. The Foundation could not make a donation to a corporation. Representative 1 of the Verizon Foundation was somewhat familiar with the Carib News paper; he has been featured in the paper and Verizon has advertised in the paper. Representative 1 of the Verizon Foundation was not aware of Carib News Charities until the entity applied for a grant. He believed Carib News Charities was the same entity as Carib News Foundation. He is not aware of any other work the Carib News Charities/Foundation is involved in other than the conference. Mr. Rodney did not talk about the Carib News Charities/Foundation at board meetings.
10. Representative 1 of the Verizon Foundation arrived at the Conference on Thursday afternoon and departed on Saturday morning. Representative 1 of the Verizon Foundation stated that he went to make his speech and promptly left the event. Representative 1 of the Verizon Foundation spoke 3 times on Friday; he was acknowledge at the welcome event on Friday morning and he participated in a demonstration on Thinkfinity in the afternoon. It is not clear from Representative 1 of the Verizon Foundation's remarks what other time he spoke at the Conference. He was invited to speak on Saturday but he did not feel that an extra day was necessary.
11. Representative 1 of the Verizon Foundation recalled seeing and speaking to Congressman Rangel. The Congressman mentioned Alltel and told him to remind his CEO to keep in mind the needs of the minority community. Representative 1 of the Verizon Foundation

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stated that he had no other contact with Members at the Conference. He did not know Delegate Christenson, Congressman Thompson, Congressman Payne and was not sure whether he saw Congresswoman Kilpatrick (he was not sure who she is). He does recall that one lady stated that she would love to see the Thinkfinity program in her state. Representative 1 of the Verizon Foundation was accompanied by Representative 2 of the Verizon Foundation 90% of the time he was at the Conference; he was not aware of any contact between Representative 2 of the Verizon Foundation and any Members.

12. Representative 1 of the Verizon Foundation received an advance copy of the agenda for the conference. The copy indicated that the Foundation was scheduled for two days of activities. He requested that the Saturday meetings be canceled or moved to Friday. He had not seen the agenda that Mr. Rodney submitted to the Ethics Committee for travel approval. He stated that advance copies of the agenda were common, most organizations provided the same level of detail with other conferences. He believed that he had seen more than one copy of the agenda. The agendas that were sent to him focused on the Foundation's participation and not the entire conference.
13. Representative 1 of the Verizon Foundation was asked if it was typical to have an agenda that listed speakers without identifying their employer/affiliations. He was not sure and didn't remember if the drafts he had seen included his title; he was more concerned with having a sense of what he would be doing at the Conference.
14. Representative 1 of the Verizon Foundation spoke with Mr. Rodney prior to the Conference to cancel the programs he was slated to speak at on Saturday (this was his 3rd call regarding the Conference – 1st call was regarding invitation, 2nd call was to discuss his participation, 3rd was to cancel Saturday programs). Mr. Rodney was receptive to Representative 1 of the Verizon Foundation's request and the Saturday program was cancelled.
15. The Foundation paid all travel expenses for Representative 1 of the Verizon Foundation. He did not see the check the Foundation issued for the Conference or the confirmation letter from Mr. Rodney. Representative 1 of the Verizon Foundation met with Mr. Rodney following the conference at a board meeting for the Foundation for the University of West Indies. He also had breakfast with Mr. Rodney at which time they briefly discussed the Conference. According to Representative 1 of the Verizon Foundation, Mr. Rodney was upset over the New York Post article regarding the Conference. Representative 1 of the Verizon Foundation stated that Mr. Rodney felt the article was misleading and that he had done everything that he was supposed to do

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regarding receiving approval from the Ethics Committee. Representative 1 of the Verizon Foundation stated that he and Mr. Rodney did not spend much time speaking about the matter. He felt that Mr. Rodney wanted him to know that he was diligent about following rules. When asked if he knew what rules Mr. Rodney was speaking about, Representative 1 of the Verizon Foundation stated that he did not know which rules he was referring to.

16. Prior to his work with the Foundation, Representative 1 of the Verizon Foundation was with Government Affairs with Verizon, his former position did not involve lobbying. His position involved Strategic Alliance, he was responsible for working with non-profits across the country. He dealt with policy issues regarding universal service. He did not interact with regulators.
17. Representative 1 of the Verizon Foundation met with Eric Eve with Citi 2-3 weeks prior to our interview, they were both attending a meeting with the head of the NAACP. He did not speak to Mr. Eve about the Conference although they did speak about scrutiny on Citi related to TARP funding. He has not had any contact with the Representative of Citi from Citi.

Beth Horton
Investigative Counsel

OFFICE OF CONGRESSIONAL ETHICS
U.S. HOUSE OF REPRESENTATIVES

18 U.S.C. § 1001 ACKNOWLEDGEMENT

I have been provided with a copy of the text of section 1001 of title 18, United States Code (popularly known as the false Statements Act) and hereby acknowledge that it applies to any testimony or documents I provide to the Office of Congressional Ethics.

Name: _____

Signature : _____

Date: 3/23/09 _____

For Office Use:
Review(s) No. _____

Exhibit 12

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended:

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re: Representative 2 of the Verizon Foundation
Review #: 09-2567; 09-4403; 09-3698; 09-6333; 09-2222
Date: March 23, 2009
Location: Verizon Offices, Washington, DC
Participants: Leo Wise
Omar Ashmawy
Beth Horton
David Kass, Assistant General Counsel Compliance
James C. Wilson, Vice President and Associate General Counsel Compliance

Summary: Representative 2 of the Verizon Foundation is the National Program Director for the Verizon Foundation and Vice President for Education & Technology for Verizon. He was interviewed pursuant to Reviews 09-2567; 09-4403; 09-3698; 09-6333; and 09-2222. Representative 2 of the Verizon Foundation helped arrange the Verizon Foundation's participation at the 13th Annual Caribbean Multinational Business Conference in 2008; he also accompanied Representative 1 of the Verizon Foundation to the event. We requested an interview with Representative 2 of the Verizon Foundation and he consented to an interview. Representative 2 of the Verizon Foundation made the following statements in response to our questioning:

1. Representative 2 of the Verizon Foundation was given an 18 U.S.C. § 1001 warning, signed a written acknowledgement of the warning

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2. Representative 2 of the Verizon Foundation is currently the National Program Director for the Verizon Foundation ("the Foundation") and Vice President for Education & Training for Verizon. He works on educational literacy and technology innovations for the Foundation, 80% of his time is spent on Thinkfinity. He is the only person with an operational role in the program.
3. Representative 2 of the Verizon Foundation helped arrange the Verizon Foundation's participation at 13th Annual Caribbean Multinational Business Conference ("the Conference") in 2008; he also accompanied Representative 1 of the Verizon Foundation to the event.
4. Representative 2 of the Verizon Foundation reviews repeat grant requests for the Foundation. When asked how the Carib News Foundation request came to his desk he stated that it was a result of conversations with Karl Rodney and Representative 1 of the Verizon Foundation. He was not sure which conversation occurred first. Representative 1 of the Verizon Foundation was invited to speak at the Conference and either simultaneously or immediately after Representative 1 of the Verizon Foundation received the invitation, Representative 2 of the Verizon Foundation spoke with Mr. Rodney.
5. Representative 2 of the Verizon Foundation believes that he spoke with Mr. Rodney in person at a meeting for the Foundation for the University of the West Indies. Mr. Rodney inquired about the application for the grant for the Conference. Representative 2 of the Verizon Foundation recalled Mr. Rodney stating that he had spoke with Representative 1 of the Verizon Foundation and that he believed the Conference would be a good fit for the Foundation and would provide a good opportunity to communicate the Foundation's program Thinkfinity.
6. The Verizon Foundation also supports the Foundation for the University of the West Indies. Representative 2 of the Verizon Foundation has interacted with Mr. Rodney regarding the Foundation for the University of the West Indies.
7. Representative 2 of the Verizon Foundation also had previous interactions with Mr. Rodney at dinner and business meetings related the American Fund and to the publication of articles on the Foundation's Thinkfinity program.
8. Representative 2 of the Verizon Foundation will have been with the Foundation 3 years in October.

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9. Representative 2 of the Verizon Foundation believes he began talking with Mr. Rodney about the Conference sometime in the summer. He spoke with Mr. Rodney about the grant application. He described to Mr. Rodney the cyber grant process and explained what needed to be provided in the grant application. The system requires applicants to be 501 (c)(3) entities.
10. The head of Governance and Compliance for Verizon verifies whether applicant is a registered 501(c)(3). A grant request from a non 501 (c)(3) would be removed from the system; the request would not be forwarded to Representative 2 of the Verizon Foundation. The Foundation's grant approval process is formal. Representative 2 of the Verizon Foundation stated that he could show a specific interest in a proposal but could not give any type of commitment to an applicant.
11. Mr. Rodney would be required to provide a deck of the '07 conference, a description of the purpose of the conference and a tentative agenda for the cyber application.
12. Representative 2 of the Verizon Foundation spoke with Mr. Rodney approximately 8-10 weeks prior to the conference at which time they discussed the level of sponsorship the Foundation was interested in funding.
13. Mr. Rodney described 3 levels of sponsorship to Representative 2 of the Verizon Foundation. Representative 2 of the Verizon Foundation stated that this was typical of corporate sponsorships at other conferences.
14. Mr. Rodney offered the Foundation a \$50,000 sponsorship, which was the gold level. Representative 2 of the Verizon Foundation believes there was also a platinum level at \$75,000. He believes that Mr. Rodney showed him a 2007 deck with 3 levels (platinum at \$75,000, gold at \$50,000, and silver at \$25,000) prior to a scheduled interview of Representative 1 of the Verizon Foundation.
15. Representative 2 of the Verizon Foundation explained to Mr. Rodney that the Foundation wished to negotiate a level of funding other than what was being offered. The amount of \$35,000 was decided upon by the Foundation.
16. When asked what the Foundation would receive for its funding, Representative 2 of the Verizon Foundation stated that they would receive signage but that the Foundation was not specifically interested in a "quid pro quo" reciprocation, the Foundation merely wanted to disseminate information about its Thinkfinity program. Representative 2 of the Verizon Foundation stated that the Foundation does not do business in the Caribbean.

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17. Representative 2 of the Verizon Foundation stated that Representative 1 of the Verizon Foundation made an introductory speech but that he was not sure whether the speech was included in the Foundation's sponsorship level; the speech was not pre-set in the 2007 sponsorship deck.
18. Representative 2 of the Verizon Foundation spoke with Mr. Rodney approximately once a week for 6-7 weeks prior to the conference to discuss Verizon's participation/logistics/capacity for web casts at the conference – contact included phone calls and emails. Contact increased as conference approached.
19. When asked how Verizon decided on \$35,000 sponsorship, Representative 2 of the Verizon Foundation stated that he received a call from the Carib staff regarding the conference. The Foundation was asked to sponsor at the \$50,000 level, a \$35,000 counter-offer was made to Mr. Rodney, which he accepted.
20. Conversations regarding sponsorship levels began about 8-10 weeks prior to the conference with the final dollar figure being determined approximately 2 weeks prior to the conference.
21. Representative 2 of the Verizon Foundation spoke with Patricia with Carib regarding sponsorship, she thought the Foundation was sponsoring at the \$50,000, Representative 2 of the Verizon Foundation explained that the amount was \$35,000. When asked if Karl Rodney was upset with the sponsorship level, Representative 2 of the Verizon Foundation answered that he was not upset.
22. Representative 2 of the Verizon Foundation worked on the conference before Carib submitted application for funding which he stated was not unusual.
23. Representative 2 of the Verizon Foundation stated that he saw early drafts of the agenda prior to the conference, and then saw final draft at conference.
24. An early draft was shared with him in order for him to staff and notify Representative 1 of the Verizon Foundation of his speaking times.
25. He did not recall seeing any affiliation information on the early draft, he believes affiliations might have appeared on final draft. He did ask that any information be included on final draft after reviewing the earlier version.
26. Representative 2 of the Verizon Foundation prepared 2 versions of the Foundation's role at the conference.

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27. The topics for the conference were decided through dialog between himself and Karl Rodney with some prior comments from Representative 1 of the Verizon Foundation. Mr. Rodney was aware of the Thinkfinity program. Representative 2 of the Verizon Foundation suggested web casts.
28. Representative 2 of the Verizon Foundation thought that Representative 1 of the Verizon Foundation and Mr. Rodney framed the Foundation's participation at the conference.
29. Town Hall event was Mr. Rodney's idea.
30. Representative 2 of the Verizon Foundation believes that Mr. Rodney was trying to bring together various corporate interests to create a dialogue about social and economic issues that would benefit both the Caribbean and the U.S.
31. Representative 2 of the Verizon Foundation stated that Carib News Foundation was the only charitable entity that he was aware of, it was the listed entity in the grant application.
32. The question arose as to who sponsored conference, Representative 2 of the Verizon Foundation stated that he was aware that Carib News was a for-profit entity, so he asked who was the sponsor. If the sponsor was Carib News, the Foundation could not participate as a sponsor.
33. Representative 2 of the Verizon Foundation stated that he did not see the check that went to the Conference, it would have been generated and sent through the internal system.
34. Representative 2 of the Verizon Foundation did not recall seeing the name Carib News Charities Inc.
35. Representative 2 of the Verizon Foundation saw an early draft of the grant application but does not recall seeing the final version. He was not responsible for final approval.
36. Kathy Browne, Senior VP for Corporate Responsibility would have approved the grant.
37. Representative 2 of the Verizon Foundation spent 2.5 days at the conference, he arrived on Thursday evening, participated at the conference on Friday and departed on Sunday.
38. Representative 2 of the Verizon Foundation and Representative 1 of the Verizon Foundation participated in the welcome remarks on Friday morning, the plenary session, and in a roundtable meeting with educational ministers.
39. Mr. Rodney arranged these meetings, the webcast did not take place.

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40. Representative 2 of the Verizon Foundation did not attend the conference on Saturday or Sunday. He also left the hotel after the Foundation completed its presentations.
41. When asked about the Town Hall meeting, Representative 2 of the Verizon Foundation stated that Karl Rodney suggested that the Foundation speak about the Thinkfinity program, the opening remarks framework was also suggested by Mr. Rodney, Mr. Eve was to give introductory remarks and then Representative 2 of the Verizon Foundation was to speak.
42. There was a back and forth discussion about the plenary session between Representative 2 of the Verizon Foundation and Mr. Rodney to determine what role the Foundation would play in conjunction with the President of Medgar Evers College. The topic was technology supporting education.
43. There was no discussion regarding scheduling sessions to benefit US companies.
44. Representative 2 of the Verizon Foundation stated that he did not have any contact with Members of Congress other than a possible introductory handshake.
45. Representative 2 of the Verizon Foundation saw Representatives Kilpatrick, Rangel and the former head of the NAACP at the conference, along with other governmental officials from other countries. He also recalled seeing Delegate Christensen and Representative Payne. Representative 2 of the Verizon Foundation did not know Representative Thompson.
46. Representative 2 of the Verizon Foundation interacted with Mr. Rodney after the conference to discuss the American Fund and the University of the West Indies. He did not discuss the conference with Mr. Rodney.
47. Representative 2 of the Verizon Foundation believes that he may have received a thank you letter from Mr. Rodney for participating at the conference.
48. He did not see the contribution-sponsorship letter.
49. Representative 2 of the Verizon Foundation was aware of Mr. Rodney's Foundation, and the fact that it sponsored the conference. He also believed Mr. Rodney's Foundation performed social work for boys and girls club events and that it worked with the American Fund for the University of the West Indies. He was not sure why he felt that Rodney's Foundation was involved with these other events.

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50. Representative 2 of the Verizon Foundation stated that the Foundation did not place any restrictions on the funding it provided to the conference through its grant, the use would have been specified in the grant application/guidelines

Beth Horton
Investigative Counsel

OFFICE OF CONGRESSIONAL ETHICS
U.S. HOUSE OF REPRESENTATIVES

18 U.S.C. § 1001 ACKNOWLEDGEMENT

I have been provided with a copy of the text of section 1001 of title 18, United States Code (popularly known as the false Statements Act) and hereby acknowledge that it applies to any testimony or documents I provide to the Office of Congressional Ethics.

Name: 

Signature: 

Date: 3/23/09.

For Office Use:
Review(s) No. _____

Exhibit 13



Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10018
Tel: (212) 944-1991; Fax: (212) 944-2089
E-mail: info@caribnewsconference.com

April 04, 2008

Ms. Marilyn Johnson
VP Marketing Development
IBM Corporation
1133 Westchester Avenue
White Plains, NY 10604

*Copy of Invitation
- copy of letter
copy of photo*

Dear Ms. Johnson:

For the past twelve years, the annual Caribbean Multi-National Business Conference has been instrumental in encouraging investment, cross-border trade and business partnerships, the role played by executives of major corporations, medium and small-size businesses and entrepreneurs, and deepens the connections with key elected officials.

Your support and that of IBM went a long way to make the conference a success, and has fostered on-going growth in business achievements and impactful policy decisions. We appreciate very much the professionalism and enthusiasm you bring to the Conference with your keen participation. The presence and demonstration of real live "IBM Partner" as a result of the conference is a powerful testimony. We do get concrete results and expressed appreciation of new opportunities.

We can assure you that all the key stakeholders, Members of Congress, Heads and Ministers of Government, Elected Officials, Community and Business Leaders are all aware and appreciative of IBM's participation in this very important mission.

This year, the Thirteenth Annual Conference is scheduled to be held in St. Maarten, November 6 - 9, 2008, and promises to further strengthen and expand on the work done by many of the Caribbean countries developing economies, in collaboration with the emerging markets initiatives in the U.S. The quality of the sessions and the high level of participation is now legendary, and is anxiously awaited each year.

Enclosed is a Power Point presentation of the sponsorship opportunities the Conference provides, and also a program and recap of the 2005-2007 Conference. We know of your interest to deepen the IBM local, regional and global connection, and I know the Conference can achieve that. It is our sincere wish that this presentation motivates your sponsorship.

3

Organized by Carib News Foundation. A non-profit project 501-C3 corporation

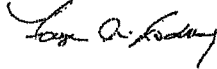
- 2 -

We would be happy to answer any questions you might have or to fill in any detail. I can be reached by e-mail: KBRodney@nycaribnews.com or (212) 944-1991.

Because we know of your busy schedule, I will also follow up with your office to ascertain interest level.

Thanks for your kind consideration.

Best regards,



Faye A. Rodney
President



Karl B. Rodney
Publisher/CEO

(4)

IBM TO US 04/29/08 W.L. MCKENZIE

7/16/2008


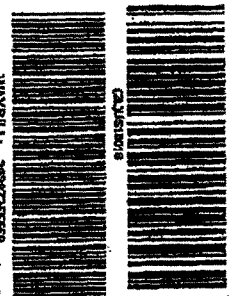
CARIB NEWS INC.
7 WEST 36TH STREET
5TH FLOOR
NEW YORK, 10018
212-944-1991

Invoice

Date	Invoice #
7/16/2008	45122

Bill To
Wanda McKenzie IBM 2607 Jesters Court Marietta, GA 30068

Description	Amount
Sponsorship Multi-National Business Conference 2008 TAX ID 13-362069	20,000.00
(6)	
Total	20,000.00

		EXP 1/1 1/E
FROM: 15 850 THROLD 4430 M. Johnson CO. AMVOLA LOGISTICS 11401 ROUTE 70 UNITED STATES PHONE: 617-286-2461 FAYE RODNEY 7 W 30TH ST 6TH FL NEW YORK NY 10018 UNITED STATES TEL: 212-844-1991		POST CODE 10018
Description: 1200 Black Weight: 1.000 DIM: 20x8-10-48 DHL number: 286223559 (See label for details)		JPRAC 0T ABH
		286223559 (See label for details)

International Business Machines Corporation
 1900 Broadway, New York, NY 10018-8832

DATE: 2008/08/08

The sum of \$ 20,000.00**

NEW YORK-CARIB NEWS
 7 W 30TH ST 6TH FL
 NEW YORK, NY 10018
 UNITED STATES

Per: *Richard J. Carroll*
 Authorized signature

00003775221# 02130437942604825847#

7

Exhibit 14

05/15/2009 17:20 FAX

002

May 15, 2009

MEMORANDUM

VIA FAX TO: 202-226-0997

TO: Omar Ashmawy
FROM: Will Ris
RE: Materials related to Carib News Foundation Conference

At your request, I am faxing you the following documents:

1. The original letter of request for support from Carib News Foundation sent to American Airlines. I assume that they sent the identical letter to other airlines because in paragraph 3, they refer to "Continental" when it should be "American". In any case, they requested a total of 95 tickets for this event. We responded orally and told them the maximum we could provide would be 10.
2. A listing of the 10 tickets that we provided. If you need more detailed records of each individual ticket, I am happy to provide it. But this shows the names and itineraries of all 10 travelers. We provided no other support for the conference except that our group sales office authorized a standard 5 percent discount on tickets for those travelling to the conference - - this is universally available to any group of 10 or more travelling to the same location.

If there is anything else I can help you with, please let me know.

09-2567 0151.2



Carib News Foundation
 7 West 36th Street, 8th floor, New York, NY 10018
 Tel: (212) 944-1991; Fax: (212) 944-2089
 E-mail: info@caribnewsconference.com

June 6, 2008

Mr. Will Rie
 Senior Vice President
 Government Affairs
American Airlines
 1101 17th Street, Suite 600
 Washington, DC 20036

(10 First)

Dear Mr. Rie:

For the past twelve years, the annual Caribbean Multi-National Business Conference has been instrumental in encouraging investment, cross-border trade and business partnerships, the role played by executives of major corporations, medium and small-size businesses and entrepreneurs, and deepens the connections with key elected officials.

This year, the Thirtieth Annual Conference is scheduled to be held in St. Maarten, November 6 - 9, 2008, and promises to further strengthen and expand on the work done by many of the Caribbean countries developing economies, in collaboration with the emerging markets initiatives in the U.S. The quality of the sessions and the high level of participation is now legendary, and is anxiously awaited each year.

Since Air Transportation is such a vital issue for the Caribbean Region, it is going to be one of the Agenda items in the Travel & Tourism sector. Continental's success is vital to the Caribbean region and the US role in world travel; we would expect significant input into any initiatives discussed.

We expect to have elected officials of the US and the Caribbean, Civic Leaders and Business- persons who can influence policies and encourage worthwhile initiatives to be at the Conference. We would welcome American Airlines' participation.

The Host Committee in the Caribbean Region and the Planning Committee in the US have all agreed to honor you with the Conference's prestigious *Marcus Garvey Bridge Builders Award*. Should you agree to accept, we would ask Congressman Charles Rangel and Congresswoman Eddie Bernice Johnson to make the presentation to you.

We are open to our customary barter of tickets for sponsorship levels, and have enclosed a proposed arrangement guide similar to last year.

Organized by Carib News Foundation. A non-profit project 501-C3 corporation

09-2567 0151.3

05/15/2008 17:20 FAX

004

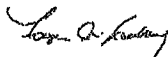
Enclosed is a Power Point presentation of the sponsorship opportunities the Conference provides, and also a program and recap of the 2006-2007 Conference. It is our sincere wish that this presentation motivates your sponsorship.

We would be happy to answer any questions you might have or to fill in any detail. I can be reached by e-mail: KBRodney@nycaribnews.com or (212) 944-1991.

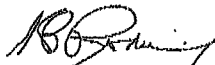
Because we know of your busy schedule, I will also follow up with your office to ascertain interest level.

Thanks for your kind consideration.

Best regards,



Faye A. Rodney
President



Karl B. Rodney
Publisher/CEO

We are expecting about 20 Members of Congress or more who will be attending along with other Civic Leaders and VIP's. Again, we will position American Airlines as one of the main carriers to the Caribbean transporting the elected officials and celebrities. To help us move the process along we would like to propose the following, that American Airlines participate as a **Gold Sponsor** of the conference in consideration for which American Airlines would receive the following:

- American Airlines will be recognized as a main sponsor.
- American Airlines name and logo will be included on all printed material.
- American Airlines will be included in all radio and television promotions.
- American Airlines will be in all Internet promotions.
- American Airlines will be a **designated sponsor** of a main event and/or a workshop with speaking opportunities.
- American Airlines will receive prominent space for display or exhibition.
- American Airlines banners will be displayed in the main conference area
- American Airlines can develop specific promotional materials.

In return for the above, American Airlines will provide *Carib News* with:

- **Maximum of fifty (50) roundtrip coach class tickets** from the 48 contiguous United States to Antigua. Reservations to be done by *Carib News* and ticketing to be by American Airlines.
- **Maximum of thirty-five (35) first-class roundtrip tickets** from the 48 contiguous United States to Antigua.
- **Maximum of five (5) coach class tickets and five (5) first class tickets** to be used for site inspection and conference planning prior to the conference.
- American Airlines will provide group fares for registered attendees. Fare and reservations & ticketing to be negotiated by American Airlines.

Site Inspection is part of the sponsorship package. We do plan to do site inspections in St. Maarten when we will officially announce the Conference and work out broad issues.

05/15/2008 17:20 FAX

000

CAROLINAS SNA CONFERENCE 2008

Organization Name	Building Code	Department	Title Code	Event Name	Admission STA	SEA	Transfer fee	Expiration Date	Member	Ranking	PRG	Transfer Name
GOVERNMENT AFFAIRS	1	RAE	PUBLICA	Caroline's SNA Conference 2008	5284	3212	1461	388873	14-Jan-09	SENL1	UNION	WILLIAM
GOVERNMENT AFFAIRS	1	RAE	PUBLICA	Caroline's SNA Conference 2008	5284	3212	1461	388873	14-Jan-09	SENL1	UNION	WILLIAM
GOVERNMENT AFFAIRS	1	RAE	PUBLICA	Caroline's SNA Conference 2008	5284	3212	1461	388873	14-Jan-09	SENL1	UNION	WILLIAM
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GOVERNMENT AFFAIRS	1	RAE	PUBLICA	Caroline's SNA Conference 2008	5284	3212	1461	388873	14-Jan-09	SENL1	UNION	WILLIAM
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GOVERNMENT AFFAIRS	1	RAE	PUBLICA	Caroline's SNA Conference 2008	5284	3212	1461	388873	14-Jan-09	SENL1	UNION	WILLIAM
GOVERNMENT AFFAIRS	1	RAE	PUBLICA	Caroline's SNA Conference 2008	5284	3212	1461	388873	14-Jan-09	SENL1	UNION	WILLIAM
GOVERNMENT AFFAIRS	1	RAE	PUBLICA	Caroline's SNA Conference 2008	5284	3212	1461	388873	14-Jan-09	SENL1	UNION	WILLIAM

Exhibit 15

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House ID	Registrant Name	Client Name	Filing Year	Filing Period	Lobbyist Full Name
3112780000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2006	Year-End	Caine, Christopher
3112301000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2006	Year-End	Caine, Christopher
3112300000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2006	Year-End	Caine, Christopher
3112300000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2007	Mid-Year	Caine, Christopher
3112300000	INTERNATIONAL BUSINESS MACHINES CORPORATION	INTERNATIONAL BUSINESS MACHINES CORPORATION	2007	Year-End	Caine, Christopher

09-2567 0151.8

311230000	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2007	Mid- Year	Caine, Christopher
311230000	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2007	Mid- Year	Caine, Christopher
311230000	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2008	1st Quarter	Caine, Christopher
311230000	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2008	2nd Quarter	Caine, Christopher
311230000	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2008	3rd Quarter	Caine, Christopher
311230000	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2008	4th Quarter	Caine, Christopher
311230000	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2009	1st Quarter	Edington, PJ
311230000	(IBM) International Business Machines Corporation (IBM)	(IBM) International Business Machines Corporation (IBM)	2005	Year- End	Caine, Christopher
401290000	QA Internal Test - New Database IBM	QA Internal Test - New Database IBM	2008	1st Quarter	None -
401290000	QA Internal Test - New Database IBM	QA Internal Test - New Database IBM	2008		Last Name 01, First Name 01
401290000	QA Internal Test - New Database IBM	QA Internal Test - New Database IBM	2008	3rd Quarter	None

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House ID	Registrant Name	Client Name	Filing Year	Filing Period	Lobbyist Full Name
310520000	CITIGROUP, INC	CITIGROUP, INC	2006	Year-End	Burgeson, Christine
310520000	CITIGROUP, INC	CITIGROUP, INC	2007	Mid-Year	Burgeson, Christine
310520000	CITIGROUP, INC	CITIGROUP, INC	2007	Year-End	Burgeson, Christine
310520000	CITIGROUP, INC	CITIGROUP, INC	2007	Year-End	Burgeson, Christine
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2007	Mid-Year	None
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2007	Year-End	None
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2008	1st Quarter	None
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2008	2nd Quarter	None
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2008	3rd Quarter	None
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2008	4th Quarter	None
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2006	Year-End	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2007	Mid-Year	Snyder, John

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316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2007	Year-End	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2008	1st Quarter	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2008	2nd Quarter	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2008	3rd Quarter	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2008	4th Quarter	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2009	1st Quarter	Snyder, John
373770000	CITIZENS FINANCIAL GROUP, INC.	CITIZENS FINANCIAL GROUP, INC.	2007	Mid-Year	Robinson, Ken
373770000	CITIZENS FINANCIAL GROUP, INC.	CITIZENS FINANCIAL GROUP, INC.	2007	Year-End	Robinson, Kenneth

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315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2006	Year-End	Davidson, Peter B.
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2007	Mid-Year	Davidson, Peter B.
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2007	Year-End	Davidson, Peter
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2008	1st Quarter	Davidson, Peter
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2008	2nd Quarter	Cantrel, Frank
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2008	3rd Quarter	Cantrel, Frank
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2008	4th Quarter	Davidson, Peter
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2009	1st Quarter	Cantrel, Frank
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2006	Year-End	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2007	Mid-Year	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2007	Year-End	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2008	1st	09-2567 0151.12

352050000	VERIZON WIRELESS	VERIZON WIRELESS	2008	Quarter	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2008	2nd Quarter	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2008	3rd Quarter	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2008	4th Quarter	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2008	1st Quarter	Brittingham, Donald
315720000	Verizon & its affiliates, except Verizon Wireless	Verizon & its affiliates, except Verizon Wireless	2005	Year-End	Davidson, Peter
315720000	Verizon & its affiliates, except Verizon Wireless	Verizon & its affiliates, except Verizon Wireless	2006	Mid-Year	Davidson, Peter
352050000	Verizon Wireless	Verizon Wireless	2005	Year-End	Azare, Monica
352050000	Verizon Wireless	Verizon Wireless	2006	Mid-Year	Azare, Monica

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Exhibit 16



**BASIC REQUIREMENTS
TO HOST
CARIBBEAN MULTINATIONAL BUSINESS CONFERENCE**

- Invitation for host conference to be issued by Prime Minister (Head of Government). This is to facilitate the attendance of several elected officials from the United States, United Kingdom and other countries.
- Prime Minister to be keynote speaker at one of the major events of the conference and participate in the closed door session with attending elected officials.
- Local host committee to be organized with all interested attorneys, agencies and associations. The chairman of this committee would be someone designated by the Prime Minister to coordinate all the activities.
- To provide the care and comfort for the VIP's attending i.e.
 - To provide 25 all-inclusive rooms for the VIP's and members of Congress attending.
 - To provide appropriate mode of transportation for VIP's and members of Congress - cars or specialized vans - not buses.
- To be a designated sponsor in one of the categories: *Title, Main or Regular Sponsor* (See Attachment).
- To organize a "Host Country Evening" - The Friday evening, the host country will host at an appropriate location an evening of food, refreshment, cultural presentation and entertainment.
- Provide for local entertainment for the various functions -
 - The Opening Ceremonies
 - The Reception
 - The Gala Dinner
- To assist in Promotion and Publicity of the conference both locally and through international office and official publications.
- Assist in securing competitive hotel rates.
- Employ and staff conference secretariat.
- Prime Minister to issue invitations along with CARIB-NEWS to members of the US Congress, other Prime Ministers and Ministers of Government.
- Participate in the Forum with Members of Congress.
- Arrange tours and activities of interest for VIP's and/or their spouses.

09-2567 0151.15

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THE NEW YORK
CARIBNEWS
 THE WEEKLY VOICE OF THE CARIBBEAN-AMERICAN COMMUNITY
 73 WEST 32ND STREET, NEW YORK, NY 10018 (212) 944-1991

August 13, 2008

The Hon. Sarah A. Wescott-Williams
 Leader of Government
 Government Administration Building
 Clam Labeaga Square, Philipsburg
 St. Maarten, N.A.

Hon. Commissioners:

Plans are moving ahead for the Thirtieth Annual Caribbean Multi-national Business Conference, November 6-9, in your beautiful country. We have sent out invitations to several Members of Congress, Prime Ministers, Presidents and Premiers, to attend the Conference. A list of those invites is attached. Senator Hillary Clinton has expressed an interest and her invitation will be forwarded soon. Also see Congressman Rangel's personal note of acceptance.

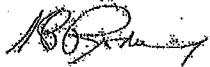
We wish for you now to send out your invitation to these individuals as previously discussed. A copy of past invitation letter is included. We will continue to do all the follow-up as planning and implementation as agreed to.

We are working on the draft of the program and will be sharing it with you and the Host Committee shortly. We would like to schedule our first Conference meeting by telephone with the Host Committee within the next 10 days, to start going over each area of the Draft requirements list, and to develop some time-line and contact person for each area.

We need to know immediately who on the Host Committee will be handling press and publicity; we can start sending Press Releases and Press updates.

We will be sending regular updates.

Kindest Regards



Karl D. Rodney
 Publisher/CEO

c.c. Commissioner Roy Marlin
 Director of Tourism, Regina LaBega
 Marla Chonont



Taking Our Rightful Place In The Sun

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Carib News Foundation
 7 West 40th Street, 8th Floor, New York, NY 10017
 Tel: (212) 944-9991; Fax: (212) 944-2080
 E-mail: info@caribnews.com

June 26, 2008

Commissioner Sarah Wescoat-Williams
 Leader of Government Business
 Government Administration Building
 Clem Labega Square
 Philipsburg, St. Maarten, NA

Dear Commissioner Wescoat-Williams:

Plans are coming in place for the Thirtieth Annual Caribbean Multi-national Business Conference scheduled for November 6-9 at your invitation to the beautiful country of St. Maarten.

We were very involved with the Conference on the Caribbean held in New York last week with some fifteen Heads of CARICOM Governments, which was a success, but took a large part of our time. All attention is now set for St. Maarten.

We have signed the contract with the Malig Resort and we are in conversation with many of our sponsors. Already we have some important names agreeing to come, including Congressman Charles Rangel and Governor of New York, David Paterson. We are mindful of the issues of interest to St. Maarten and so we have issued invitations to several Members of Congress, Heads of Education and Health Institutions. A strong financial sector is expected; already Citibank and HSBC are on board.

There is very strong interest in the conference and all the information about the conference as St. Maarten is now on the website, in print and on radio. The promotion has begun in earnest.

We would now wish to start liaison with the local host committee to coordinate our planning with yours. Could you be kind enough to please identify the committee and the contact person and other information. We would wish that the person would report to you directly or Commissioner Marlin to expedite any matter.

Please find attached ideas for the Theme and some areas of concentration from which we can develop the program. The Host Committee should use the basic requirement as the basis for their planning. We will send a matrix of some time line and arrange for our next planning visit.

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2008 CARIBBEAN MULTI-NATIONAL BUSINESS CONFERENCETHEMES

We are suggesting as possible themes, the following:

Please feel free to change, adjust or even new approaches.

CHANGING STRATEGIES TO EMBRACE NEW POSSIBILITIES - THE GLOBAL MARKET

MOVING BEYOND BARRIERS TO A STRATEGY FOR GLOBAL COMPETITIVENESS

CHANGING STRATEGIES, BUILDING ALLIANCES, FACING NEW REALITIES

A REGION IN TRANSITION - STRATEGY FOR CHANGE, ALLIANCE FOR PROGRESS

AREAS OF CONCENTRATION

We are also now adapting the presentations and the workshops and the areas of concentration are some of which were suggested by yourself and Commissioner Martin.

1) TOURISM

- Pre clearance
- Unfunded mandate by the US
- Investment in Tourism
- Health tourism
- Regional co-operation

2) HEALTH

- St. Maarten, ideal location for Regional Health Center
- Delivery of health care
- Lifestyle diseases - diabetes, hypertension, obesity
- Health Investment
- Collaboration with US Institutions

3) EDUCATION

- Collaboration with US institutions
- Curriculum development
- Presentation of Thinkality - high tech tool for teaching
- Initiative between the University of the West Indies and Medgar Evers College

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 7 West 86th Street, 8th floor, New York, NY 10017
 Tel: (212) 944-1991, Fax: (212) 944-2089
 E-mail: info@caribnewsconference.com

To : Host Committee
 Caribbean Multi-National Business Conference
 c/o: Bernard Hunt, Sonesta Maho Beach Resort

From : Karl B. Rodney
 CARIB NEWS

Date : October 15, 2008

SUBJECT : Town Hall Meetings

In the interest of organizing successful Town Hall Meetings, and to make program print deadlines, we suggest the use of the space available at the Sonesta Maho for those meetings.

We think the participation of the local groups and individuals in these meetings are necessary and productive because of the subject matter. We would therefore urge a strong outreach media program and direct contact to interest groups to ensure success of the FOIA.

Thursday 5:00 - 6:30pm : Healthy Eating and Living

Friday 4:30 - 6:00pm : Education - Sharing Working Solutions

Saturday 4:30 - 6:00 pm : Technology

There is a great line up and we may have some additional star power. Commissioner Sarah Wescer-Williams also suggested she might have additional local speakers for these for a, and we welcome that.

Thanks for your kind cooperation.

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 7 West 40th Street, 8th Floor, New York, NY 10017
 Tel: (212) 544-9091, Fax: (212) 544-2089
 E-mail: info@caribnewsfoundation.com

February 8, 2008

Commissioner Sarah Wescoat-Williams
 Leader of Government Business
 Government Administration Building
 Clem Labega Square
 Philipsburg, St. Maarten, NA

Dear Commissioner Wescoat-Williams:

It is with great pleasure that I wish to inform you that the Planning Committee has selected St. Maarten to host the Thirtieth Annual Caribbean Multi-National Business Conference, November 6-9, 2008. There was great interest in St. Maarten because of your personal invitation issued in Antigua, and certainly all the other excellent facilities on the island.

We look forward to a great conference and with working with you and your team. We would wish that you appoint the Host Committee as soon as possible so that the real planning will start. We will be proposing some thematic approaches for your consideration, in order to get the right participants and targeted topics.

We have the proposal from the hotels and will be making that selection within the week, after which we can start the promotion. The **SAVE THE DATE** and **VENUE** will be going out to the Members of Congress shortly. We will develop a time line for the other activities.

We are proceeding with the plan and would appreciate the formal letter of invitation.

We are very excited about working with you and St. Maarten again, and we expect a great conference.

Congratulations, and thanks for your kind consideration.

Very Truly Yours,

Paye A. Rodney

President

Karl B. Rodney
 Publisher/CEO

cc. Marla Chemont, Marketing Assistant

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 E-mail: info@caribnewsfoundation.com

January 23, 2008

Commissioner Sarah Wescot-Williams
 Leader of Government Business
 Government Administration Building
 Clax Labega Square
 Philipsburg, St. Maarten, NA

Dear Commissioner Wescot-Williams:

Thank you very much for inviting us to St. Maarten to explore the possibility of St. Maarten as the Host Venue for the Thirteenth Annual Caribbean Multi-National Business Conference, scheduled for November 6-9, 2008.

We had the pleasure of meeting with Commissioner Roy Martin to discuss the conference, its mission, and of course, St. Maarten's priorities to be addressed in the conference. Among the areas discussed were:

- * The Passport issue and its impact on St. Maarten and the Caribbean
- * The US Pre-clearance option and what are the possibilities
- * Educational collaboration and in-state tuition consideration for students from St. Maarten
- * A major women's initiative at the conference and targeting many large sponsors to hold meetings and conventions in St. Maarten
- * The influence on impact of the Congressional delegation on the current constitutional negotiations with the Dutch Government, particularly where the Dutch Government has lobbied these Members on their special interests.
- * An appealing or special role model to address the youth of St. Maarten
- * To conduct community outreach programs involving the wider population in the areas of Health, Education and possibly Technology.

These are areas that we can establish direct linkages with elected officials, professional experts, corporate perspectives and certainly business opportunities.

We were reminded by Ludwig Oumtche the then President of the Chamber of Commerce, that it was in St. Maarten that the issue of Increase of Duty Free Allowance was raised and was subsequently raised to twice the amount within six months, benefitting all the merchants not only in St. Maarten but the Caribbean.

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E-mail: info@caribnewsconference.com

April 04, 2008

Ms. Marilyn Johnson
VP Marketing Development
IBM Corporation
1133 Westchester Avenue
White Plains, NY 10604

*Copy of [unclear]
- copy of [unclear]
- copy of [unclear]*

Dear Ms. Johnson:

For the past twelve years, the annual Caribbean Multi-National Business Conference has been instrumental in encouraging investment, cross-border trade and business partnerships, the role played by executives of major corporations, medium and small-size businesses and entrepreneurs, and deepens the connections with key elected officials.

Your support and that of IBM went a long way to make the conference a success, and has fostered on-going growth in business achievements and impactful policy decisions. We appreciate very much the professionalism and enthusiasm you bring to the Conference with your keen participation. The presence and demonstration of real live "IBM Partner" as a result of the conference is a powerful testimony. We do get concrete results and expressed appreciation of new opportunities.

We can assure you that all the key stakeholders, Members of Congress, Heads and Ministers of Government, Elected Officials, Community and Business Leaders are all aware and appreciative of IBM's participation in this very important mission.

This year, the Thirteenth Annual Conference is scheduled to be held in St. Maarten, November 6 - 9, 2008, and promises to further strengthen and expand on the work done by many of the Caribbean countries developing economies, in collaboration with the emerging markets initiatives in the U.S. The quality of the sessions and the high level of participation is now legendary, and is anxiously awaited each year.

Enclosed is a Power Point presentation of the sponsorship opportunities the Conference provides, and also a program and recap of the 2006-2007 Conference. We know of your interest to deepen the IBM local, regional and global connection, and I know the Conference can achieve that. It is our sincere wish that this presentation motivates your sponsorship.

3

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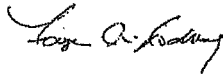
- 2 -

We would be happy to answer any questions you might have or to fill in any detail. I can be reached by e-mail: KBRodney@nycaribnews.com or (212) 944-1991.

Because we know of your busy schedule, I will also follow up with your office to ascertain interest level.

Thanks for your kind consideration.

Best regards,



Faye A. Rodney
President



Karl B. Rodney
Publisher/CBO

(4)

Exhibit 17

Registration

From: plouie.l@oula.com
Sent: Monday, October 15, 2007 11:00 AM
To: Kelly Mobley, Dawn
Subject: RE: Carib News - Pre-trip Approval Issues

Ms. Olson,
In response to your e-mail, the answer to your question is NO.
Regards and Thanks for your patience

Patricia Lewis,
Executive Assistant
CARIB NEWS
7 West 34th Street, 8th Floor
New York, NY 10018

From: Kelly Mobley, Dawn (mailto:Dawn.KellyMobley@mail.house.gov)
Sent: Monday, October 15, 2007 10:28 AM
To: plouie
Subject: FW: Carib News - Pre-trip Approval Issues

PVI

From: Olson, Susan
Sent: Friday, October 12, 2007 2:41 PM
To: plouie
Cc: Kelly Mobley, Dawn; Kelly, Bill
Subject: RE: Carib News - Pre-trip Approval Issues

Ms. Lewis,

Please explain in more detail your email message below relative to the "sponsors contribute to the overall expense of the trip." In this regard, do the following entities pay for any of the expenses of the trip for the invited House Members, including roundtrip air transportation costs, lodging costs, meal costs, cost of a particular meal or reception, etc.?

- o Antigua Government
- o Sandals
- o Royal Caribbean Bakery
- o CITI
- o Pfizer
- o Macy's
- o AT&T
- o HSBC
- o IBM

10/15/2007

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- o Goodworks International
- o Preferred Health Partners
- o Antigua & Barbuda
- o American Airlines
- o Golden Krust

Susan L. Olson

Counsel
 House Committee on Standards of Official Conduct
 HT-2, The Capitol Building
 Washington, DC 20515
 Phone: 202-225-7103
 Fax: 202-225-7392

From: plouy@mail.house.gov
 Sent: Thursday, October 11, 2007 10:39 AM
 To: Susan Olson
 Subject: RE: Carib News - Pre-trip Approval Issues

Ms. OLSON,
 In response to your e-mail:
 This sponsors contribute to the overall expense of this trip and the general work of the Foundation.
 As a courtesy, each contributor is given an opportunity to be attached to a part of the program that is being presented. They do not determine the content or the other participants in the conference.

Federally registered lobbyists or foreign agents will not be accompanying the Members or participating in the program.

Regards,

Patrick Lohr
 Executive Assistant
 CARIB NEWS
 7 West 38th Street, 8th Floor
 New York, NY 10018

Original Message
 From: Olson, Susan [mailto: Susan.Olson@mail.house.gov]
 Sent: Wednesday, October 10, 2007 4:07 PM
 To: plouy@mail.house.gov
 Cc: Dawn Kelly-Moyle@mail.house.gov; O'Reilly, Bill

10/15/2007

09-2567 0154

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CN-000054

Subject: Carib News - Pre-trip Approval Issues

Dear Mrs. Louis:

With regard to the pre-trip approval requests for the Carib News Foundation's (Foundation) trip to Antigua, the issues involving sponsorship are as follows:

While the sponsor form that you completed indicates that the Foundation is the sole sponsor of the 2007 trip, the draft schedule, however, indicates that the following entities are "sponsoring" sessions, events, etc. during this trip:

- a. Antigua Government
- a. Barbuda
- o. Royal Caribbean Bakery
- a. CMA
- o. Pfizer
- o. M&A's
- o. AT&T
- a. HSBC
- o. IBM
- o. GSNetworks International
- a. Preferred Health Partners
- o. Antigua & Barbuda
- o. American Airlines
- o. Golden Krust

Last year the Foundation provided the following information regarding these "additional sponsors" for the November 9 to 12, 2006 trip:

The Foundation, which is a 501(c)(3) nonprofit organization, will be paying for the Members' travel expenses including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a "contribution to the overall pool of expenses in contribution to the Foundation," which is used to "underwrite the overall expenses of the Conference," primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organization who will be attending and participating in the Conference.

Accordingly, the Committee's Advisory Opinion, dated October 27, 2006, provided that all of the organizations that provided financial underwriting for the trip along with the Foundation were required to be listed as the "trip sponsors" on the participating Members' post-travel disclosure form and their 2006 annual financial disclosure statements.

Accordingly, you need to provide information describing the role of these "additional sponsors" as listed in the 2007 trip draft schedule for this current trip. Without such information, I cannot proceed with the review of the pre-trip approval requests for the Foundation's Antigua trip.

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09-2567 0155

CONFIDENTIAL

CN-000055

Susan L. Olson

Counsel

House Committee on Standards of Official Conduct

PTF-2, The Capitol Building

Washington, DC 20515

Phone: 202-225-7103

Fax: 202-225-7392

10/15/2007

09-2567 0156

CONFIDENTIAL

CN-000056



THE NEW YORK
CARIB NEWS
 THE VOICE OF THE CARIBBEAN-AMERICAN COMMUNITY
 7 WEST 30TH STREET, 43 FLOOR, NEW YORK, NY 10018

TEL: (212) 944-1991; FAX: (212) 944-2089
 E-MAIL ADDRESSES: NYCARIB@AOL.COM;
 CARIBNEWS@ATT.NET

FACSIMILE TRANSMITTAL SHEET

TO:	FROM:
Susan Olson	R. Lewis
COMPANY:	DATE:
House Care on Standards	10/12/97
FAX NUMBER:	TOTAL NO. OF PAGES INCLUDING COVER:
212-224-7392	
RE: Travel Certification Form	
<input type="checkbox"/> URGENT <input type="checkbox"/> FOR REVIEW <input type="checkbox"/> PLEASE COMMENT <input type="checkbox"/> PLEASE REPLY <input type="checkbox"/> YOUR INFORMATION	

Ms. Olson,
 In response to your e-mail - the Conference is paid for by CARIB NEWS
 FOUNDATION.

The companies are participants. They are not sponsors or co-sponsors for any part
 of the trip and play no role in the planning or content.

The program has been amended to reflect the companies as Participants.

I regret the misunderstanding and thank you for your patience as I go through and
 grow through this process, which is new to me.

I look forward to hearing from you.

Regards

09-2567 0157

CONFIDENTIAL

CN-000057

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Friday, October 12, 2007 1:55 PM
To: paulg
Subject: RE: Confidential

The fax did not come through. I will be stepping out of the office for the remainder of the day, but will be in early Monday. Please follow up again with Susan. I have explained that the organizations you labeled as co-sponsors are not. They support your foundation annually, but have not and will not pay for the Members trip. This is simply a misunderstanding of the terms "sponsor", "contributor", and "participant" as used in the Ethics rules which is why I sent you the Rules book for preparation.

Once you are able to clarify these issues and make sure your itinerary passes too, you should be fine. An Ethics Committee Staff Attorney must review and approve as well. Your Staff Attorney is Susan.

From: Kelly Mobley, Dawn
Sent: Friday, October 12, 2007 11:55 AM
To: paulg
Subject: RE: Confidential

Have you spoken with your Director and explained the problem so you can call Olson asap?

From: Kelly Mobley, Dawn
Sent: Friday, October 12, 2007 9:59 AM
To: paulg
Subject: FW: Confidential

Please read the emails below. Give Susan a call as soon as you work through the kinks, let her know you are following up. Please make yourself available to work through this matter today. Thank you Patricia. (These other organizations can participate in the program but should not help pay for the trip).

From: Olson, Susan
Sent: Friday, October 12, 2007 9:29 AM
To: O'Reilly, Bill; Kelly Mobley, Dawn
Subject: FW: Carib News - Pre-trip Approval Issues

Bill and Dawn,
 Please note the following response from Ms. Louis at Carib News: Unfortunately, it appears that if each sponsor contributes funding directly to the trip (an earmark of funds) and not simply to the general funds of Carib News, then the assumption is that all of these entities are co-sponsors of the trip for purposes of the House travel rules. If that is the case and since it is likely that at least one of these co-sponsors hires or retains a federally registered lobbyist, the trip could only be a one-day event trip. Thus the Committee can't approve the trip as it currently exists.

But, if you have a different interpretation of the below information from Ms. Louis, please do let
 10/12/2007

09-2567 0158

CONFIDENTIAL

C.N.000058

me know. Thanks! Susan.

Susan L. Olson

Counsel

House Committee on Standards of Official Conduct

HT-2, The Capitol Building

Washington, DC 20515

Phone: 202-225-7103

Fax: 202-225-7392

From: plous (mailto:plous@ny.caribnews.com)
 Sent: Thursday, October 11, 2007 10:33 AM
 To: Olson, Susan
 Subject: RE: Carib News - Pre-trip Approval Issues

Ms. Olson,

In response to your e-mail:

The sponsors contribute to the overall expense of the trip and the general work of the Foundation.

As a courtesy, each contributor is given an opportunity to be attached to a part of the program that is being presented. They do not determine the content or the other participants in the Conference.

No federally registered lobbyist or foreign agent will be accompanying the Members or participating in the program.

Regards

Patricia Louis
 Executive Assistant
 CARIB NEWS
 7 West 36th Street, 8th Floor
 New York, NY 10018

-----Original Message-----
 From: Olson, Susan (mailto:susan.olson@mail.house.gov)
 Sent: Wednesday, October 10, 2007 4:01 PM
 To: plous@ny.caribnews.com
 Cc: Dawn.Kelly.Mobley@mail.house.gov; O'Reilly, Bill
 Subject: Carib News - Pre-trip Approval Issues

Dear Mrs. Louis:

With regard to the pre-trip approval requests for the Carib News Foundation's

10/12/2007

09-2567 0159

CONFIDENTIAL

CONFIDENTIAL

(Foundation) trip to Antigua, the issues involving sponsorship are as follows:

While the sponsor form that you completed indicates that the Foundation is the sole sponsor of the 2007 trip, the draft schedule, however, indicates that the following entities are sponsoring sessions, events, etc. during this trip:

- o Antigua Government
- o Sandals
- o Royal Caribbean Bakery
- o BCI
- o Pfizer
- o Macy's
- o AT&T
- o HSBC
- o IBM
- o Goodworks International
- o Preferred Health Partners
- o Antigua & Barbuda
- o American Airlines
- o Golden Krust

Last year the Foundation provided the following information regarding these "additional sponsors" for the November 9 to 12, 2006 trip:

The Foundation, which is a 501(c)(3) nonprofit organization, will be paying for the Members' travel expenses including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a "contribution to the overall pool of expenses in contribution to the [Foundation]" which is used to "underwrite the overall expenses of the Conference," primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organization who will be attending and participating in the Conference.

Accordingly, the Committee's Advisory Opinion, dated October 27, 2006, provided that all of the organizations that provided financial underwriting for the trip along with the Foundation were required to be listed as the "trip sponsors" on the participating Members' post-travel disclosure form and their 2006 annual financial disclosure statements.

Accordingly, you need to provide information describing the role of these "additional sponsors" as listed in the 2007 trip draft schedule for this current trip. Without such information, I cannot proceed with the review of the pre-trip approval requests for the Foundation's Antigua trip.

Susan L. Olson

Counsel

House Committee on Standards of Official Conduct

10/12/2007

09-2567 0160

CONFIDENTIAL

C:\N\00060

HT-2, The Capitol Building
Washington, DC 20515
Phone: 202-225-7103
Fax: 202-225-7392

10/12/2007

09-2567 0161

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CN-000061



**THE NEW YORK
CARIBNEWS**
THE WEEKLY VOICE OF THE CARIBBEAN-AMERICAN COMMUNITY
1 WEST 86TH STREET, 41 FLOOR, NEW YORK, NY 10018

TEL: (212) 944-1991; FAX: (212) 944-2089
E-MAIL ADDRESS: NYCARIB@AOL.COM;
CARIBNEWS@ATT.NET

FACSIMILE TRANSMITTAL SHEET

TO:	FROM:
Dawn Kelly Mobley	P. Louis
COMPANY:	DATE:
Ethics Counsel for Cong. Stephanie Tubbs Jones	10/11/07
FAX NUMBER:	TOTAL NO. OF PAGES INCLUDING COVER:
202-225-4892	
RE: Travel Form	

URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY YOUR INFORMATION

Further to our conversations of this morning, following is the Travel Certification Form..

The Conference is paid for by the Carib News Foundation. The companies are participants, are not sponsors or co-sponsors for any part of the trip and they are not in the planning or content.

The program has been amended to reflect the companies as Participants

I regret the mis-understanding and thank you for holding my hand as I go through and grow through this process which is new to me.

Kindly review and advise before I send to Ms. Olson.

I look forward to hearing from you.

09-2567 0162

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CN-000062

Registration

From: Thomas, Shelley [Shelley.Thomas@mail.house.gov]
Sent: Thursday, October 11, 2007 7:47 AM
To: poulis
Subject: RE: Carib News - Pre-trip Approval Issues

This is new territory, since we never had to go through this before. I don't have an answer and I already turned in Donna's forms.

From: poulis [mailto:poulis@caribnews.com]
Sent: Wednesday, October 10, 2007 3:55 PM
To: Kelly Mobley, Dawn, Thomas, Shelley Bailey, George
Subject: RE: Carib News - Pre-trip Approval Issues

Please see e-mail I received from Ms. Olson of the Committee on Standards of Official Conduct.

A possible response could be: The sponsors contribute to the overall expense of the trip and the general work of the Foundation. As a courtesy, each contributor is given an opportunity to be attached to a part of the program that is being presented. They do not determine the content or the other participants in the Conference.

Please advise us

Regards and Thanks

Patricia Poulis
 Executive Assistant
 CARIB NEWS
 7 West 38th Street, 8th Floor
 New York, NY 10018

-----Original Message-----
From: Olson, Susan [mailto:Susan.Olson@mail.house.gov]
Sent: Wednesday, October 10, 2007 4:01 PM
To: poulis@caribnews.com
CC: Dawn, Kelly Mobley@mail.house.gov, O'Reilly, Bill
Subject: Carib News - Pre-trip Approval Issues

Dear Mrs. Louise:

With regard to the pre-trip approval requests for the Carib News Foundation's (Foundation) trip to Antigua, the issues involving sponsorship are as follows:

While the sponsor form that you completed indicates that the Foundation is the sole sponsor of the 2007 trip, the draft schedule, however, indicates that the following entities are "sponsoring"

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sessions, events, etc. during this trip:

- o Antigua Government
- o Sandals
- o Royal Caribbean Bakery
- o CITI
- o Pfizer
- o Macy's
- o AT&T
- o HSBC
- o IBM
- o Goodworks International
- o Preferred Health Partners
- o Antigua & Barbuda
- o American Airlines
- o Golden Kiosk

Last year the Foundation provided the following information regarding these "additional sponsors" for the November 9 to 12, 2006 trip:

The Foundation, which is a 501(c)(3) nonprofit organization, will be paying for the Members' travel expenses including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a "contribution to the overall pool of expenses in contribution to the [Foundation]," which is used to "underwrite the overall expenses of the Conference," primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organization who will be attending and participating in the Conference.

Accordingly, the Committee's Advisory Opinion, dated October 27, 2006, provided that all of the organizations that provided financial underwriting for the trip along with the Foundation were required to be listed as the "trip sponsors" on the participating Members' post-travel disclosure form and their 2006 annual financial disclosure statements.

Accordingly, you need to provide information describing the roles of these "additional sponsors" as listed in the 2007 trip diary schedule for this current trip. Without such information, I cannot proceed with the review of the pre-trip approval requests for the Foundation's Antigua trip.

Susan L. O'Connell
 Counsel
 House Committee on Standards of Official Conduct
 HT-2, The Capitol Building
 Washington, DC 20515
 Phone: 202-225-7103
 Fax: 202-225-7392

09-2567 0164

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CN-000064

Re: Carib News - Pre-trip Approval Issues

Page 1 of 3

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Wednesday, October 10, 2007 6:46 PM
To: plouls@nycahnews.com
Subject: Re: Carib News - Pre-trip Approval Issues

Her question centers on whether any of these "co-sponsors" retain a lobbyist or foreign. This is the issue you and I focused on previously. It's a central problem if any do and are paying for the events. If so, you are in the same position as last year, with your day events. Call Susan back tomorrow as early as possible. Hopefully, these co-sponsors don't retain lobbyists, but you should have their representations on this matter. At a minimum, Mac's note, right? Alternatively, if they are only sponsoring event tables or the like, a lobbyist will not be problematic.

Sent using BlackBerry

Original Message

From: plouls@nycahnews.com
To: Kelly Mobley, Dawn; Thomas, Shelley; Dalley, George
Sent: Wed, Oct 10, 2007 12:56:25 PM
Subject: Re: Carib News - Pre-trip Approval Issues

Please see e-mail I received from Mr. Olson of the Committee on Standards of Official Conduct:

A possible response could be: The sponsors contribute to the overall expense of the trip and the general work of the Foundation. As a courtesy, each contributor is given an opportunity to be attached to a part of the program that is being presented. They do not determine the content or the other participants in the Conference.

Please advise us.

Regards and Thanks

Patricia Lewis
Executive Assistant
CARIBNEWS
7 West 26th Street, 8th Floor
New York, NY 10018

Original Message
From: Olson, Susan (mailto: Susan.Olson@mail.house.gov)
Sent: Wednesday, October 10, 2007 4:01 PM

09-2567 0165

CONFIDENTIAL

CN-000065

NO. CARIB NEWS - PRE-TRIP APPROVAL ISSUES

Page 2 of 3

To: louis@mycaribnews.com
 Co: Dawn Kelly Mohby@small.house.gov; O'Grady, Bill
 Subject: Carib News - Pre-Trip Approval Issues

Dear Mrs. Louis:

With regard to the pre-trip approval requests for the Carib News Foundation's (Foundation) trip to Antigua, the issues involving sponsorship are as follows:

While the expense form that you completed indicates that the Foundation is the sole sponsor of the 2007 trip, the draft schedule, however, indicates that the following entities are "sponsoring" sessions, events, etc. during this trip:

- o Antigua Government
- o Sandals
- o Royal Caribbean Bakery
- o CITI
- o Pfizer
- o Macy's
- o A&T
- o HSBC
- o IBM
- o Goodworks International
- o Preferred Health Partners
- o Antigua Barbuda
- o American Airlines
- o Golden Krust

Last year the Foundation provided the following information regarding these "additional sponsors" for the November 9 to 12, 2006 trip:

The Foundation, which is a 501(c)(3) nonprofit organization, will be paying for the Members' travel expenses including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a "contribution to the overall pool of expenses in contribution to the [Foundation]" which is used to "underwrite the overall expenses of the Conference," primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organization who will be attending and participating in the Conference.

Accordingly, the Committee's Advisory Opinion, dated October 27, 2006, provided that all of the organizations that provided financial underwriting for the trip along with the Foundation were required to be listed as the "trip sponsors" on the participating Members' post-travel disclosure form and their 2006 annual financial disclosure statements.

10/10/2007

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CONFIDENTIAL

CN-000066

Accordingly, you need to provide information describing the roles of these "additional sponsors" as listed in the 2007 trip draft schedule for this current trip. Without such information, I cannot proceed with the review of the pre-trip approval requests for the Foundation's Antigua trip.

Susan L. Olson
Counsel
House Committee on Standards of Official Conduct
RT-2, The Capitol Building
Washington, DC 20515
Phone: 202-225-7103
Fax: 202-225-7392

10/10/2007

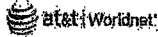
09-2567 0167

CONFIDENTIAL

CN-000067

From: Shelley Thomas

Page 1 of 1



[Print] [Close]

From: "Thomas, Shelley" <Shelley.Thomas@mail.house.gov>
 "James, Corlis" <Corlis.James@mail.house.gov>, "Long, Keryn" <Keryn.Long@mail.house.gov>,
 "Blajon, Mary" <Mary.Blajon@mail.house.gov>, "Chaplin, Jennie"
 "Jennie.Chaplin@mail.house.gov", "Pickens, Crystal" <Crystal.Pickens@mail.house.gov>, "Hamlett,
 Dorrell" <Barbara.Hamlett@mail.house.gov>, "Hendricks, Jasper"
 "Jasper.Hendricks@mail.house.gov", "Daley, Katie" <Katie.Daley@mail.house.gov>,
 "GAD4Scheduling" <GAD4Scheduling@mail.house.gov>, "Murray, Darlene"
 "Darlene.Murray@mail.house.gov", "Elsar, Pat" <Pat.Elsar@mail.house.gov>, "Featherston,
 Wendy" <Wendy.Featherston@mail.house.gov>, "Pittman, Megan" <MPittman@mail.house.gov>,
 To: "King, Lella" <Lella.King@mail.house.gov>, "Resendez, Mariana"
 "Mariana.Resendez@mail.house.gov", "Kolliga, Talyana" <Talyana.Kolliga@mail.house.gov>,
 "Taylor, Garry" <Garry.Taylor@mail.house.gov>, "Anderson, Kwamina (Waters)"
 "Kwamina.Anderson@mail.house.gov", "Howie, Eliza" <Eliza.Howie@mail.house.gov>, "Bojé,
 Angèle" <Angèle.Bojé@mail.house.gov>, "Roddey, Raven" <raven.roddey@mail.house.gov>,
 "Waskow, Sean" <Sean.Waskow@mail.house.gov>, "Hornes, Alice"
 "Alice.Hornes@mail.house.gov", "Epps, Nona" <Nona.Epps@mail.house.gov>, "Johnson, Aya"
 "Aya.Johnson@mail.house.gov"
 Cc: "Carle-Jackson, Jeff"
 Subject: Emailing 110th rule change page
 Date: Thu, 4 Oct 2007 16:36:22 +0000

To the CBC Members who indicated a "yes" or "maybe" in attending the
 Carib News Foundation Business Conference in Antigua, British West
 Indies on November 8-11, of 2007, I have attached the web site for the
 travel form that must be submitted by Members no later than 10:00PM,
 October 9 to the Ethics Committee. I will be bringing copies of the
 agenda, as well as copies of the ethics form that Carib News had to
 complete and submit to Ethics, to all of the offices indicated above,
 today and tomorrow by noon. If anyone has any questions, please call me
 at 5-1790. PLEASE MAKE SURE THAT MEMBERS HAVE THEIR OFFICIAL PASSPORT,
 AS WE ARE GOING TO A FOREIGN COUNTRY.

This message is ready to be sent with the following file or link
 attachments:

Shortcut to: http://www.house.gov/ethics/110th_rule_change_page.htm

Note: To protect against computer viruses, e-mail programs may prevent
 sending or receiving certain types of file attachments. Check your
 e-mail security settings to determine how attachments are handled.
 <110th_rule_change_page.url>

Attachment 1: 110th_rule_change_page.url (application/octet-stream)

09-2567 0168

<http://webmail.att.net/wmc/n/wmc/47056C17000D0D2F00002DBD2168376225059C0A0B...> 10/4/2007

CONFIDENTIAL

CN-000068

New Travel Regulations, Forms, and Instructions (effective March 1, 2007):

The House Rules for the 110th Congress changed the travel rules for Members, staff, and outside sponsors. Regulations, forms, and instructions governing privately-sponsored travel taking place after March 1, 2007 are available below. An Advisory Memorandum providing additional guidance regarding travel was released on March 15, 2007. New versions of the forms relating to privately-sponsored travel were released April 6, 2007.

- **Travel Guidelines and Regulations**
- **Instructions and Certification Form to be filled out by Private Sponsors**
- **Traveler Form to be filled out by Members, Officers, and Employees**
- **Post-Travel Disclosure Form for Members and Officers**
- **Post-Travel Disclosure Form for Employees**

Please Note: Both the Private Sponsor Certification and the Member/Officer/Employer Traveler Form must be filed with the Committee at the same time in order to process your request.

New Gift Rule Changes:

The House Rules for the 110th Congress amended House Rule 25, Clause 3 (the "gift rule") with respect to the acceptance of gifts and travel. Some of the guidance on this website regarding gifts and travel may therefore no longer apply. On February 6, 2007, the Committee issued an advisory memorandum on the changes to the gift rule. On May 24, 2007, the House amended the gift rule exception concerning the acceptance of offers of free attendance at charity events. In view of the amendment, on June 14, 2007, the Committee issued a revised memorandum that incorporates the change to the rule. Please contact Committee staff at 202-225-7103 with any questions.

Financial Interests under New Earmark Rules

The House Rules for the 110th Congress changed the Code of Official Conduct regarding earmarks. This provision requires that a Member, Delegate, or Resident Commissioner who requests an earmark or a limited tax or tariff benefit to provide certain information regarding the request and its purpose to the committee of jurisdiction. An Advisory Memorandum providing guidance in this matter was released on March 27, 2007.

09-2567 0169

CONFIDENTIAL

CN-000069

Registration

From: Smith, Hilary [Hilary.Smith@mail.house.gov]
Sent: Thursday, October 04, 2007 4:32 PM
To: ploule@nycafbnews.com
Subject: Travel Approval Forms for Antigua Trip

Patricia,

Here is what I need fixed--

12 -- Describe the role of each sponsor in organizing and conducting the trip -- The answer should say something about how Carib News organized, planned, pulled together the invitee list and chose the destination.

13 -- Describe the organizational interest -- It is the Carib News Annual conference.

The request forms, along with the list of invitees, should be sent to each invitee to then send to the committee so that we do not receive the wrong forms from the Congressional offices. Let me know if you have any questions.

Hilary Smith

Committee on Standards of Official Conduct

RT-2, The Capitol

Washington, DC 20515

202-225-7403

10/4/2007

09-2567 0170

CONFIDENTIAL

CN-000070

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
 Sent: Wednesday, October 03, 2007 2:02 PM
 To: plouis
 Subject: RE: Please read query below

Ignore the last email b/c we are working to meet the 30-day submission. Just stand by so we can get back in touch today; have it all resolved tomorrow. Monday is a holiday.

From: Kelly Mobley, Dawn
 Sent: Wednesday, October 03, 2007 12:39 PM
 To: plouis
 Subject: RE: Please read query below

Thank you. We have assigned your review to Staff Attorney Susan Olson. Please reach her by phone at 202226-8806 next week. If she has not reached out to you, she will need a few days of review. Thank you very much.

From: plouis [mailto:plouis@nycarbnews.com]
 Sent: Monday, October 01, 2007 6:40 PM
 To: Kelly Mobley, Dawn
 Subject: RE: Please read query below

The Conference dates are November 8-11, 2007 and opens on Thursday November 8 and ends the morning of November 11, 2007 - (3 nights)

CARIE NEWS FOUNDATION is the Sponsor of the event.

Item No. 12: The companies like Pfizer, AT&T are donors/contributors of grants to the Foundation for educational purposes and NOT the SPONSOR, consequently I assume the information contained in that item will have to be changed.

Awaiting your advice.

Regards

Faigle's Louis
 Executive Assistant
 CARIE NEWS
 7 West 88th Street, 8th Floor
 New York, NY 10018

----- Original Message -----
 From: Kelly Mobley, Dawn [mailto:Dawn.KellyMobley@mail.house.gov]
 Sent: Monday, October 01, 2007 5:10 PM

10/3/2007

09-2567 0171

CONFIDENTIAL

Registration

From: plouie [plouie@nycaribnews.com]
 Sent: Monday, October 01, 2007 8:40 PM
 To: Kelly Mobley, Dawn
 Subject: RE: Please read query below

The Conference dates are November 8-11, 2007, and opens on Thursday, November 8 and ends the morning of November 11, 2007. (3 nights)

CARIB NEWS FOUNDATION is the Sponsor of the event.

Item No. 12: The companies like Pfizer, AT&T are donors/contributors of grants to the Foundation for educational purposes and **NOT** the SPONSOR, consequently I assume the information contained in that item will have to be changed.

Awaiting your advice.

Regards

Patricia Louis
 Executive Assistant
 CARIB NEWS
 7 West 35th Street, 8th floor
 New York, NY 10018

-----Original Message-----

From: Kelly Mobley, Dawn [mailto:Dawn.KellyMobley@mail.house.gov]
 Sent: Monday, October 01, 2007 5:10 PM
 To: plouie
 Subject: RE: Please read query below

From: Kelly Mobley, Dawn
 Sent: Monday, October 01, 2007 5:08 PM
 To: Kelly Mobley, Dawn
 Subject: RE: Query

We are trying to work through a problem in approving the co-sponsors place. Are they each paying for a one-day, widely attended event or more days? Please read the Cliff Rules I forwarded you on this matter.

From: Kelly Mobley, Dawn
 Sent: Tuesday, September 25, 2007 12:42 PM
 To: plouie

10/1/2007

09-2567 0172

CONFIDENTIAL

CN-000072

Please forward the paperwork as well to the Chairwoman's personal office so her scheduler can complete the work from that office. Please get it to Laila King today. Her fax number is 202/225-1390. She has to complete the Members forms and meet the same deadline.

From: plouffe [mailto:plouffe@nycaribnews.com]
Sent: Monday, October 01, 2007 8:40 PM
To: Kelly Mobley; Dawn
Subject: RE: Please read query below

The Conference dates are November 8-11, 2007, and opens on Thursday November 8 and ends the morning of November 11, 2007. (3 nights).

CARIB NEWS FOUNDATION is the sponsor of the event.

Item No. 12. The companies like Pfizer, AT&T are donors/contributors of grants to the Foundation for educational purposes and NOT the SPONSOR, consequently I assume the information contained in that item will have to be changed.

Awaiting your advice.

Regards

Daphne Lewis
Executive Assistant
CARIB NEWS
7 West 36th Street 8th Floor
New York, NY 10018

----- Original Message -----
From: Kelly Mobley; Dawn [mailto:Dawn.KellyMobley@mail.house.gov]
Sent: Monday, October 01, 2007 5:10 PM
To: plouffe
Subject: RE: Please read query below

09-2567 0173

CONFIDENTIAL

CN-000073

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Monday, October 01, 2007 6:10 PM
To: plouls
Subject: RE: Please read query below

From: Kelly Mobley, Dawn
Sent: Monday, October 01, 2007 5:08 PM
To: Kelly Mobley, Dawn
Subject: RE: Query

We are trying to work through a problem in approving the co-sponsors place. Are they each paying for a one-day, widely attended event or more days? Please read the Gift Rules I forwarded you on this matter.

From: Kelly Mobley, Dawn
Sent: Tuesday, September 25, 2007 12:42 PM
To: plouls
Subject: Query

I am working through your forms before leaving them with our staff attorney and have a question. Query: Why did you not list CARLE NEWS as the sponsor as you indicated instead of Macy's, etc. The official sponsor for travel, lodging, and planning is still Carle News, correct?

From: Kelly Mobley, Dawn
Sent: Tuesday, September 18, 2007 12:57 PM
To: plouls
Subject: RE: Draft Program - 2007 Business Conference (No agenda or program attached)

When you send the draft agenda, please also forward any information on your sponsor's status, if the sponsor is a lobbyist. Do you need a copy of the new travel rules?

From: Kelly Mobley, Dawn
Sent: Monday, September 17, 2007 5:53 PM
To: plouls
Subject: RE: Draft Program - 2007 Business Conference

Nothing was attached to this email. Therefore, we have not received the proposed agenda you mention below and have nothing to preview.

From: plouls [mailto:plouls@nypanet.com]
Sent: Monday, September 17, 2007 3:47 PM
To: Kelly Mobley, Dawn
Subject: Draft Program - 2007 Business Conference

Ms. Mobley:
 We spoke earlier re permission for Members to attend the Conference and you asked for

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Page 2 of 2

The program. I have not gotten back to you because we have been working on getting the program together. Attached is the draft for your guidance.

Regards and Thanks

Patricia Linder
Executive Assistant
CARIB NEWS
2 West 38th Street, 8th Floor
New York, NY 10018

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THE NEW YORK CARIBNEWS
THE WEEKLY VOICE OF THE CARIBBEAN AMERICAN COMMUNITY
7 WEST 4TH STREET, 21 FLOOR, NEW YORK, NY 10011

TEL: (212) 944-1981, FAX: (212) 944-2089
E-MAIL ADDRESS: NYCARIB@AOL.COM;
CARIBNEWS@ATT.NET

FACSIMILE TRANSMITTAL SHEET	
TO: Dawn Kelly Mobley	FROM: Patricia Louis
CONTENT:	DATE: 9/21/07
PAGE NUMBER: 202-225-7382	TOTAL NO. OF PAGES INCLUDING COVER:
RE: SPONSOR FORMS	
<input type="checkbox"/> URGENT <input type="checkbox"/> FOR REVIEW <input type="checkbox"/> PLEASE COMMENT <input type="checkbox"/> PLEASE REPLY <input checked="" type="checkbox"/> YOUR INFORMATION	

Following is a completed form for your advisement /review/comments.

Regards

U.S. House of Representatives
Committee on Standards of Official Conduct

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM
(provide directly to each House invitee)

This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers or employees under House Rule XXV, clause 5. A completed copy of the form (and any attachments) should be provided to each invited House Member, officer or employee, who will then forward it to the Committee. The trip sponsor should NOT submit the form directly to the Committee.

Private sponsors are urged to submit this form to each House invitee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the failure to accept the sponsor for the trip. The submission of an incomplete form will delay the review process. Before completing this form, sponsors are urged to carefully review the Committee's private travel guidelines and advisory memoranda detailing the rules and restrictions for private travel, as well as the instructions for completing this form. Sponsors should call the Committee with any questions prior to submitting the form. Please type form.

Dan's News Foundation

1. Sponsor(s) (who will be paying for the trip): _____
2. I represent that the trip will not be financed (in whole or in part) by a federally-registered lobbyist or a registered foreign agent (check) "yes" by checking box:
3. I represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip (check) "yes" by checking box:
4. Is travel being offered to an accompanying family member of the House invitee(s)? Yes No
5. Provide names and titles of ALL House invitees; for each invitee, provide explanation of why the individual was invited (include additional paper if necessary): Each House invitee's spouse is invited or one family member

6. Dates of travel: November 6-11, 2007
7. Cities of departure - destination - return: Varies depending on member

8. Attached is a detailed agenda of the activities taking place during the travel (i.e., an hourly description of planned activities) (check) "yes" by checking box:
9. I represent that (check one of the following):
 - a. The sponsor of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965:
 - b. The sponsor of the trip does not retain or employ a federally-registered lobbyist or registered foreign agent:
 - c. The trip is for attendance at a one-day event and lobbyist involvement in planning, organizing, requesting, or arranging the trip was de minimis under the Committee's travel regulations:
10. If travel is for participation in a one-day event (i.e., if you checked Question 9(c)), check one of the following:
 - a. One-night lodging and meals are being offered:
 - b. Two-nights' lodging and meals are being offered:
 If "b" is checked, explain why the second night is warranted: _____

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11. If the trip is not sponsored by an institution of higher education, I represent that a federally registered lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip (signify "yes" by checking box)

12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip: Pfizer-Education/Health AT&T and IBM: provide technology in the region. MACYS - seeks new vendor sources, Citibank: opportunities in the region.

13. Describe each sponsor's organizational interest in the purpose of the trip: Regular scheduled air service, economy class.

14. Describe the type and class of the transportation being provided. Indicate whether coach, business-class or first-class transportation will be provided. In addition, for travel via aircraft, please indicate if travel is being offered on a commercial flight, chartered flight or on an aircraft operated or paid for by a carrier not licensed by the Federal Aviation Administration to operate the transportation or hire (i.e., a private aircraft). If first-class rate is being provided, or if travel is via chartered or private aircraft, please provide an explanation describing why such travel is warranted.

15. I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s). (signify "yes" by checking box)

16. I represent that either (check one of the following):
a. This trip involves an event that is arranged or organized without regard to congressional participation and that meals provided to congressional participants are similar to those provided to or purchased by other event attendees.
b. The trip involves events that are arranged or organized specifically with regard to congressional participation.
If "b" is checked, detail the cost per day of meals (approximate cost may be provided):

17. Reason for selecting the location of the event or trip: A Caribbean country that has not previously hosted the conference.

18. Name of hotel or other lodging facility: Sandals Resort/Beach Resort

19. Cost per night of hotel or other lodging facility (approximate cost may be provided): \$110.00

20. Reason(s) for selecting hotel or other lodging facility: Has appropriate meeting rooms

71. TOTAL EXPENSES FOR EACH PARTICIPANT

Actual amounts Eligible full estimates	Total Transportation Expenses per Participant	Total Lodging Expenses per Participant	Total Meal Expenses per Participant
For each Member, Officer, or employee	320	330	195
For each accompanying family member	320	0	195

	Other Expenses (dollar amount)	Identify Specific Nature of "Other" Expenses (e.g., taxi, parking, registration fee, etc.)
For each Member, Officer, or employee:		
For each accompanying family member:		

22. I represent that reimbursement for miscellaneous travel expenses for the trip, such as travel to and from airports, security costs, interpreter fees, visa application fees, and similar expenses, will be for actual costs incurred and are necessary for the purposes of the trip. (Signify "yes" by checking box)

23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: _____

Name and title: _____

Organization: _____

Address: _____

Telephone number: _____

Facsimile: _____

Home Address: _____

The Committee may contact the above individual above if additional information is required.

If there are any questions regarding this form please contact the Committee at the following address:

Committee on Standards of Official Conduct
U.S. House of Representatives
H-2, The Capitol
Washington, D.C. 20515
(202) 225-7103 (phone)
(202) 225-7392 (general fax)
(202) 225-7172 (fax for travel approvals)

Version date 4/2007 by Committee on Standards of Official Conduct.

U.S. House of Representatives
Committee on Standards of Official Conduct

INSTRUCTIONS FOR FILLING OUT THE PRIVATE SPONSOR TRAVEL
CERTIFICATION FORM

1. *Sponsor(s) (who will be paying for the trip):* Fill in the names of each person, organization, or other entity contributing funds or in-kind support towards the trip.
2. *I represent that the trip will not be financed (in whole or in part) by a federally-registered lobbyist or a registered foreign agent:* House Members and staff may not accept travel funded by a lobbyist or registered foreign agent, even when the lobbyist or foreign agent will be reimbursed by a client or employer.
3. *I represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip:* All financial contributors to the trip must qualify as sponsors and should be listed as a sponsor in response to question 1.
4. *Is travel being offered to an accompanying family member of the House invitee(s)?* Check yes or no. House Rules permit Members and House staff to accept travel benefits for one accompanying family member if offered by the trip sponsor.
5. *Provide names and titles of ALL House invitees; for each invitee, provide explanation of why the individual was invited:* You must list every House Member and employee who is invited on the trip, together with your reason for inviting that individual. Members and House staff may accept privately sponsored travel only when related to the individual's official duties. The explanation should demonstrate a connection between the trip and each invitee's official duties.
6. *Dates of Travel:* State the dates of departure and return.
7. *Cities of departure -- destination -- return:* For example, an appropriate entry might read: "DC - Detroit - DC". Include additional destinations if there will be more than one. Do not list the names of airports, times of flights, or cities where travelers will have an airport layover (this information should be included in the attached detailed agenda).
8. *Attached is a detailed agenda of the activities taking place during the travel:* The agenda should be a detailed, hour-by-hour agenda, include the names of speakers and the subjects of briefings. The agenda should also include information regarding the time spent on travel to and from the destination, as well as local travel. Travel will not be approved if the agenda includes an excessive amount of either unscheduled time and/or opportunities for recreational activities, even if such activities are at the personal expense of the invitee.

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9. *I represent that (check one of the following):* Check only one box in response to this question. "Institutions of higher education" generally includes accredited public and private colleges or trade schools located in the U.S. and its territories; such entities should check box "a," regardless of whether they employ or retain a federal lobbyist or foreign agent. Entities other than institutions of higher education that do not employ or retain a federal lobbyist or foreign agent should check box "b." Entities other than institutions of higher education that do employ or retain a registered lobbyist or foreign agents may sponsor travel only for one-day events. For such trips, lobbyist involvement must be "de minimis" as defined by Committee regulations (see question 12).
10. *If travel is for participation in a one-day event, check one of the following:* Complete this question only if you checked box "b" in response to question 9. For travel to one-day events sponsored by an entity that retains or employs a lobbyist, lodging and meals generally may be provided only for one night. However, two nights may be authorized by the Committee in accordance with the factors set forth in Committee regulations.
11. *If the trip is not sponsored by an institution of higher education, I represent that a federally-registered lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip.* House Rules prohibit Members and employees from being accompanied by registered lobbyists or foreign agents while traveling. This rule does not prohibit lobbyist or foreign agent participation in briefings or meetings that occur at the destination.
12. *Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip.* The sponsor(s) (the entity or entities paying for the trip) should be the entity primarily responsible for organizing the trip. Travel may not be accepted from an entity that merely contributes money towards the travel and is not otherwise involved in planning or conducting the trip.
13. *Describe each sponsor's organizational interest in the purpose of the trip:* Briefly describe the interest or purpose of each sponsor in the trip.
14. *Describe the type and class of transportation being provided:* See directions on form.
15. *I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s):* While Members and staff may accept local transportation necessary in facilitating their participation in officially-connected aspects of a trip, Members and staff may not accept local transportation in connection with recreation or entertainment.
16. *I represent that either:* For events that are arranged or organized without regard to congressional participation (e.g., annual meetings of business or trade associations), Members or employees may accept the meals that are provided to all other attendees as part of the event. For events put on specifically for Members or staff, meal expenses must be "reasonable" in accordance with Committee regulations.

17. *Reason for selecting the location of the event or trip:* The destination of a trip must be related to its purpose. Travel to a location of an event organized without regard to congressional participation (for example, annual meetings of business or trade associations) is presumptively reasonable.
18. *Name of hotel or other lodging facility:* Include the names of all hotels and lodging facilities to be used during the trip.
19. *Cost per night of hotel or other lodging facility:* Self-explanatory. Trip sponsors should not pay for a "package" that includes recreational or entertainment activities. However, Members and staff may generally use a pool or gym facilities that are offered free of charge to all hotel guests.
20. *Reason(s) for selecting hotel or other lodging facility:* For events held without regard to congressional participation (e.g., annual meetings of business or trade associations), an entry such as "location of annual trade association meeting" is sufficient. When the trip is held specifically for Members or staff, include rationale such as proximity to the site to be visited or to the airport.
21. *Total Expenses for Each Participant:* Indicate whether the figures provided are actual amounts or good faith estimates by checking the appropriate box. All trip expenses should be included. Expenses other than those for transportation, lodging, and meals must be individually listed and specified.
22. *I represent that reimbursement for miscellaneous travel expenses for the trip, such as travel to and from airports, security costs, interpreter fees, visa application fees, and similar expenses, will be for actual costs incurred and are necessary for the purpose of the trip.* Members and staff may not accept a lump sum based on an estimate of incidental expenses.
23. *Certification Information:* Self-explanatory.

THE TRIP SPONSOR SHOULD PROVIDE A COPY OF THE COMPLETED FORM, INCLUDING ALL ATTACHMENTS, TO EACH HOUSE MEMBER OR EMPLOYEE INVITED ON THE TRIP.

Version Date 4/2007 Committee on Standards of Official Conduct

U.S. House of Representatives
COMMITTEE ON STANDARDS OF
OFFICIAL CONDUCT
Washington, DC 20515

October 27, 2006

Mrs. Michaela Rodney
Cable News Foundation
7 West 36th Street 8th Floor
New York, NY 10018

Dear Ms. Rodney:

This responds to your letter requesting Committee guidance regarding the participation of House Members in the 11th Annual Caribbean Multi-National Business Conference ("Conference") sponsored by the Cable News Foundation ("Foundation"), and other organizations.¹ The conference is scheduled to take place in Nassau, City, Bahamas from November 9 to 12, 2006. According to your submission, the Foundation, which is a 501(c)(3) nonprofit organization, will be paying for the Members' travel expenses including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip expenses provide a "contribution to the overall pool of expenses in contribution to the Foundation," which is used to "underwrite the overall expenses of the Conference," primarily for the meal expenses. These materials further provide that these additional expenses have representatives from their organization who will be attending and participating in the Conference.

The Committee on Standards of Official Conduct strongly encourages outside organizations considering whether to fund travel expenses to House Members and staff to contact our office for information about the rules governing the acceptance of such an offer. It is important to bear in mind, however, that the Committee is authorized by the Rules of the U.S. House of Representatives to render advisory opinions to Members, officers, and employees regarding the propriety of current or proposed conduct. We do not render such opinions to private organizations. Particularly in the case of travel, it is the Member, officer, or employee who is at risk in the case of a violation of the rules. Given the different circumstances in which individual Members and employees fund themselves, it would be inappropriate for an outside organization to suggest that a trip had been "pre- cleared" by the Committee. However, we are able to provide you with some general information.

¹ According to your submission, the additional trip expenses include Mary's, Inc. Queen, Prince, ADAM, Golden Eagle, President, American Airlines, Caribbean, USA, Nassau, City, and the Republic of Bahamas.

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Mr. Nicholas Rodney
October 27, 2006
Page 2

House Rule 25, clause 2 (the gift rule) permits a Member or employee of the House to accept from a private source (other than a registered lobbyist or agent of a foreign principal) the necessary travel expenses to attend a meeting, speaking engagement, fact-finding trip, or similar event in connection with official duties if the private source is directly and immediately associated with the event or location being visited. "Necessary" expenses include reasonable expenses for transportation, lodging, food, and refreshments, but they do not include expenditures for entertainment or recreational activities.

Generally, any gifts that may be offered during the trip, including any gifts of entertainment or recreational activity, must be valued at a total of less than \$50 for the trip, with the annual gift limit of less than \$100 from a single source. On any trip, the aggregate value of any such gifts that may be accepted from any source is less than \$50.

In the case of international travel, security expenses may be accepted for not more than seven days, excluding travel. House Members may also accept expenses to enable one family member to accompany them on the trip, if invited by the trip sponsor. In addition, each Member who participates in the trip must complete a Travel Disclosure and file this form with the Clerk of the House within 30 days after their return. See House Rule 25, cl. 5(b)(1)(A)(ii), (b)(3). Members are also required to report all travel expenses totaling more than \$400 from a single source on Schedule VII of their annual financial Disclosure Statement under the Ethics in Government Act and House Rule 25. On both forms, Members should indicate as the "trip sponsor" all of the organizations that provided financial underwriting for the trip.

Because the trip will involve meetings with foreign governmental representatives and the trip sponsors include the Republic of Panama and Panama City, it is important to note that government officials, including Members and employees of Congress, are prohibited by Article I, section 9, clause 2, of the United States Constitution from receiving "any present... from any King, Prince, or a foreign state or a representative of a foreign government without the consent of the Congress." In the Foreign Gifts and Acceptances Act (5 U.S.C. § 7342) (50 USC 2687), Congress has consented in advance to acceptance of gifts of travel or expenses for travel taking place entirely outside of the United States offered by a foreign government. Gifts of travel or expenses for travel include food, lodging, transportation, and entertainment related to the official duties of a Member, officer, or employee. Congress has also consented to the acceptance of gifts "of substantial value tendered as a gift or mark of courtesy." 5 U.S.C. § 7342(c)(1)(A). Under this provision and implementing regulations issued by this Committee, the term "substantial value" is defined as \$25. The FECA also permits Members and staff to accept a gift worth more than minimal value when refusal would cause offense or embarrassment such gifts are the property of the United States and must be deposited with the Clerk of the House. Any tangible gifts valued in excess of minimal value or travel expenses of any value received from a foreign government pursuant to FECA must be disclosed on a Form for Disclosing Gifts from Foreign Governments, in addition to the

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Mr. Michele Rodino
October 27, 2009
Page 3.

travel disclosure form described above. Copies of both forms are available on the Committee Website.

Any House Members invited to travel at private expense should be encouraged to contact the Committee's Office of Advice and Education at (202) 225-7103 if they have any questions on the applicable rules. Please provide a copy of this letter to each invited Member.

If you have any further questions, please contact the Committee's Office of Advice and Education at extension 57103.

Sincerely,


Dan Hastings
Chairman


Howard L. Berman
Ranking Member

11/06/2009

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Carib News Foundation
 7 West 96th Street, 8th floor, New York, NY 10018
 Tel: (212) 944-1991; Fax: (212) 944-2089
 E-mail: info@caribnewsconference.com

October 10, 2006

The Honorable Doc Hastings
 Chair
 Standards of Official Conduct
 Rm. HT-2, The Capitol
 Washington, DC 20515

Via Fax: 202-225-7592 & US Mail

Dear Committee Chair Hastings:

As you might be aware, The Carib News Foundation, created to provide a forum for businesses from the United States to dialogue and establish business partnerships with communities in other parts of the world, has invited Members of Congress to participate in the 11th anniversary of the Caribbean Business Conference.

This year the conference will be held in Panama City, Panama from November 9 - 12, 2006. In cooperation with the Government of Panama, our goal is to have all interested parties joining forces to foster an atmosphere of democracy, stability and opportunity for our fellow citizens of the world. It will also allow businesses in the United States to introduce their products to a new market, thus adding to the economy of both countries.

It is important for Members of Congress to attend in order to get insights into the global economy and how current law and proposed legislation can add in assisting their constituents to move towards a global exchange.

To this effect, The Carib News Foundation and its Board of Directors, respectfully request approval for the Members to attend. If there are any questions or concerns, you may contact me at 212-944-1991. I look forward to making this event as successful in its 11th year as it has been in the past 10 conferences.

Sincerely,

Michelo Rodney
 President
 Carib News Foundation

cc: Congresswoman Stephanie Tubbs-Jones

Organized by Carib News Foundation. A non-profit project 501-C-3 corporation

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Registration

From: plouls [plouls@nycaribnews.com]
Sent: Friday, September 21, 2007 1:58 PM
To: 'Dawn.KellyMoblely@mail.house.gov'
Subject: Re Sponsorship information

The official sponsor of the conference is the CARIB NEWS FOUNDATION, a not-for-profit 501CS Organization that provides educational information about the Caribbean Region and its relationship with the US in doing business and developing good neighborly ties with the United States, security, health, education etc.

The CARIB NEWS FOUNDATION does not retain or employ a registered lobbyist or registered foreign agent.

Please use me as your contact for the purposes of this Conference.

The form will be emailed to you this afternoon.

Regards

Patricia Lewis

Executive Assistant
CARIB NEWS
7 West 38th Street, 8th Floor
New York, NY 10018

9/21/2007

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Re: Sponsorship information

Page 1 of 1

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Wednesday, September 19, 2007 6:32 PM
To: plouls@nycarthnews.com
Subject: Re: Sponsorship information

My condolences. No, we did not know of their loss. Is Mr. Rodney our actual contact in this matter? If so when appropriate, please impress upon him that the rules have changed dramatically and there are certain gifts and travel that can no longer be permitted so we need to clear this as early as possible. Moreover as he probably remembers, all Members have to seek approval for their individual travel...forms must be prepared, submitted, and approved for each Member's travel. Therefore, please remember to provide each of your invitees with the requisite paperwork. Hopefully by preparing early, we can circumvent the majority of problems you faced in securing their congressional travel last year. Have a good evening and please share my condolences with the Rodneys. Dawn

Sent using BlackBerry

-----Original Message-----

From: plouls <plouls@nycarthnews.com>
To: Kelly Mobley, Dawn
Sent: Wed Sep 19 18:23:58 2007
Subject: Sponsorship information

9/20/2007

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Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Wednesday, September 19, 2007 3:23 PM
To: plouls
Subject: RE: Draft Program - 2007Business Conference (No agenda or program attached)

Lastly, just send the sponsor form asap for review. The new rules might prohibit some things you were able to do with so many different sponsors in the past, but until we get the form, we can't make the most informed decision. I have let the Congresswomen know we are awaiting your sponsor form. Just as you do, they would also like assurance. Thank you.

From: Kelly Mobley, Dawn
Sent: Wednesday, September 19, 2007 3:09 PM
To: 'plouls'
Subject: RE: Draft Program - 2007Business Conference (No agenda or program attached)

I am mailing (US Postal) a copy of the official Gifts and Travel Guide. Some pages are omitted so call with any questions not addressed in the bound pages. I am using the address you provide in your emails.

From: Kelly Mobley, Dawn
Sent: Wednesday, September 19, 2007 2:16 PM
To: 'plouls'
Subject: RE: Draft Program - 2007Business Conference (No agenda or program attached)

Patricia:

I understand that several organizations will take part in sponsoring food and other parts of the Antigua travel. However, I need clarification on the official sponsor; that organization providing travel, lodging, and organizing the trip? Am I to assume it is CARIB NEWS? The official sponsoring organization must not retain or employ a registered lobbyist or registered foreign agent (and the sponsor must have a direct and immediate relationship with the event or location being visited). To assist with this, I am scanning information/guidelines and emailing in just a moment. Please provide a fax number if that method of submittal will be more helpful. If there is someone handling this matter, please provide me their direct contact information as I must ensure adherence to these new guidelines pre-travel.

In any event, I do need to know who the official sponsor will be. I have assigned a staff attorney to review your documents and will remain in contact with you until this matter is finalized.

Please respond today or tomorrow at the latest. I will be traveling for a while thereafter and must ensure that my staff attorney has all that is necessary for a safe review.

Dawn Kelly Mobley
Ethics Counsel for Congresswoman Stephanie Tubbs Jones
Chairwoman, Committee on Standards of Official Conduct
U.S. of Representatives
Washington, DC 20515
202/225-7103

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Tuesday, September 18, 2007 7:03 PM
To: plouls@myparibnews.com
Subject: Re: Draft Program - 2007Business Conference (No agenda or program attached)

~~Remove this information from your distribution list~~
Sent using BlackBerry

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We had received the forms from Shelley.
 The sponsors to date are : MACYS, PFIZER, AMERICAN AIRLINES, GOLDEN KRUST
 BAKERY, CARIBBEAN FOOD DELIGHTS, PREFERRED HEALTH PARTNERS, IBM,
 AT&T/CINGULAR

Regards

Patricia Louis
 Executive Assistant
 CARIB NEWS
 7 West 36th Street, 8th Floor
 New York, NY 10018

-----Original Message-----

From: Kelly Mobley, Dawn [mailto:Dawn.KellyMobley@mail.house.gov]
 Sent: Tuesday, September 18, 2007 12:57 PM
 To: plouis
 Subject: RE: Draft Program - 2007Business Conference (No agenda or program attached)

When you send the draft agenda, please also forward any information on your sponsor's status.
 If he cannot be a lobbyist. Do you need a copy of the new travel rules?

From: Kelly Mobley, Dawn
 Sent: Monday, September 17, 2007 5:53 PM
 To: 'plouis'
 Subject: RE: Draft Program - 2007Business Conference

Nothing was attached to this email. Therefore, we have not received the proposed agenda you
 mention below and have nothing to preview.

From: plouis [mailto:plouis@nycaribnews.com]
 Sent: Monday, September 17, 2007 3:47 PM
 To: Kelly Mobley, Dawn
 Subject: Draft Program - 2007Business Conference

Ms. Mobley:
 We spoke earlier re permission for Members to attend the Conference and you asked for
 the program. I have not gotten back to you because we have been working on getting
 the program together.
 Attached is the draft for your guidance

Regards and Thanks

Patricia Louis
 Executive Assistant
 CARIB NEWS
 7 West 36th Street, 8th Floor
 New York, NY 10018

9/20/2007

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Exhibit 18

U.S. House of Representatives
Committee on Standards of Official Conduct

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM
(provide directly to each House invitee)

This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers or employees under House Rule XXV, clause 5. A completed copy of the form (and any attachments) should be provided to each invited House Member, officer or employee, who will then forward it to the Committee. The trip sponsor should NOT submit the form directly to the Committee.

Private sponsors are urged to submit this form to each House invitee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the invitee not receiving approval for the trip. The submission of an incomplete form will delay the review process. Before completing this form, sponsors are urged to carefully review the Committee's private travel guidelines and advisory memoranda detailing the rules and restrictions for private travel, as well as the instructions for completing this form. Sponsors should call the Committee with any questions prior to submitting the form. Please type form.

- CARIB NEWS FOUNDATION
1. Sponsor(s) (who will be paying for the trip): _____
 2. I represent that the trip will not be financed (in whole or in part) by a federally-registered lobbyist or a registered foreign agent (signify "yes" by checking box):
 3. I represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip (signify "yes" by checking box):
 4. Is travel being offered to an accompanying family member of the House invitee(s)? Yes No
 5. Provide names and titles of ALL House invitees; for each invitee, provide explanation of why the individual was invited (include additional pages if necessary): EACH REPRESENTATIVE'S SPOUSE
 6. Dates of travel: NOVEMBER 8 - 11, 2007
 7. Office of departure - destination - return: VARIES DEPENDING ON MEMBER
 8. Attached is a detailed agenda of the activities taking place during the travel (i.e., an hourly description of planned activities) (signify "yes" by checking box):
 9. I represent that (check one of the following):
 - a. The sponsor of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965: or
 - b. The sponsor of the trip does not retain or employ a federally registered lobbyist or registered foreign agent: or
 - c. The trip is for attendance at a one-day event and lobbyist involvement in planning, organizing, requesting, or arranging the trip was *de minimis* under the Committee's travel regulations.
 10. If travel is for participation in a one-day event (i.e., if you checked Question 9(c)), check one of the following:
 - a. One-night's lodging and meals are being offered: or
 - b. Two-nights' lodging and meals are being offered:
 If "b" is checked, explain why the second night is warranted: _____

11. If the trip is not sponsored by an institution of higher education, I represent that a federally-registered lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip (signify "yes" by checking box):
12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip: CARIB NEWS FOUNDATION (SEE ATTACHED SHEET)
13. Describe each sponsor's organizational interest in the purpose of the trip: THE INTEREST OF CARIB NEWS FOUNDATION IS TO PROMOTE, INFORMATION, TRADE AND MEANINGFUL CONNECTION BETWEEN THE UNITED STATES AND THE CARIBBEAN
14. Describe the type and class of the transportation being provided. Indicate whether coach, business-class or first-class transportation will be provided. In addition, for travel via aircraft, please indicate if travel is being offered on a commercial flight, chartered flight or on an aircraft operated or paid for by a carrier not licensed by the Federal Aviation Administration to operate for compensation or hire (i.e., a private aircraft). If first-class fare is being provided, or if travel is via chartered or private aircraft, please provide an explanation describing why such travel is warranted: REGULAR SCHEDULED AIR SERVICE, ECONOMY CLASS
15. I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s). (signify "yes" by checking box):
16. I represent that either (check one of the following):
- The trip involves an event that is arranged or organized *without regard* to congressional participation and that meals provided to congressional participants are similar to those provided to or purchased by other event attendees:
 - The trip involves events that are arranged or organized *specifically with regard* to congressional participation:
If "b" is checked, detail the cost per day of meals (approximate cost may be provided): _____
17. Reason for selecting the location of the event or trip: A CARIBBEAN COUNTRY THAT HAS NOT PREVIOUSLY HOSTED THE CONFERENCE
18. Name of hotel or other lodging facility: SANDALS RESORT/REX RESORT
19. Cost per night of hotel or other lodging facility (approximate cost may be provided): \$1 0.00
20. Reason(s) for selecting hotel or other lodging facility: HAS APPROPRIATE MEETING ROOMS

21. TOTAL EXPENSES FOR EACH PARTICIPANT:

<input type="checkbox"/> actual amounts <input checked="" type="checkbox"/> good faith estimates	Total Transportation Expenses per Participant	Total Lodging Expenses per Participant	Total Meal Expenses per Participant
For each Member, Officer, or employee	320	330	145
For each accompanying family member	320	0	145

	Other Expenses (dollar amount)	Identify Specific Nature of "Other" Expenses (e.g., taxi, parking, registration fee, etc.)
For each Member, Officer, or employee		
For each accompanying family member		

22. I represent that reimbursement for miscellaneous travel expenses for the trip, such as travel to and from airports, security costs, interpreter fees, visa application fees, and similar expenses, will be for actual costs incurred and are necessary for the purpose of the trip (signify "yes" by checking box):

23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: 

Name and title: KARL B. RODNEY, CEO

Organization: CARIB NEWS FOUNDATION

Address: 7 WEST 85TH STREET, 8TH FLOOR NEW YORK, NY 10018

Telephone number: 212-844-1891

Fax number: 212-844-2089

Email Address: CARIB-DESK@ATT.NET

The Committee staff may contact the above individual above if additional information is required.

If there are any questions regarding this form please contact the Committee at the following address:

Committee on Standards of Official Conduct
 U.S. House of Representatives
 HT-2, The Capitol
 Washington, DC 20515
 (202) 225-7103 (phone)
 (202) 225-7392 (general fax)
 (202) 225-7172 (fax for travel approvals)

Version date 4/2007 by Committee on Standards of Official Conduct

2007 MULTINATIONAL BUSINESS CONFERENCE			
NOVEMBER 8 - 11, 2007			
INVITED MEMBERS OF CONGRESS			
Sanford Bishop			
G. K. Butterfield			
Donna M. Christensen			
William Lacy Clay			
Sheila Jackson Lee			
Eddie Bernice Johnson			
Kendrick Meek			
Donald Payne			
Charles Rangel			
Bennie Thompson			
Stephanie Tubbs-Jones			
Carolyn Kilpatrick			
Barbara Lee			
Gregory Meeks			
Edolphus Towns			
Yvette Clarke			
Maxine Waters			
James Clyburn			
David Scott			
Laura Richardson			
Eleanor Holmes-Norton			
Elijah Cummings			
Diane Watson			
Keith Ellison			
Henry Johnson			
Melvin Watt			
Albert Wynn			
John Lewis			

2007 MULTINATIONAL BUSINESS CONFERENCE			
NOVEMBER 8-11, 2007			
INVITED MEMBERS OF CONGRESS			
Sanford Bishop			
G. K. Butterfield			
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Shella Jackson Lee			
Eddie Bernice Johnson			
Kerndrick Meek			
Donald Payne			
Charles Rangel			
Bernie Thompson			
Stephanie Tubbs-Jones			
Carolyn Kilpatrick			
Barbara Lee			
Gregory Meeks			
Edolphus Towns			
Yvette Clarke			
Marcia Waters			
James Clyburn			
David Scott			
Laura Richardson			
Eleanor Holmes-Norton			
Elijah Cummings			
Diane Watson			
Keith Ellison			
Henry Johnson			
Melvin Watt			
Albert Wynn			
John Lewis			
Britt Weinstock			
George Dalley			



Carib News Foundation
7 West 36th Street, 8th floor, New York, NY, 10017
Tel: (212) 944-1991 Fax: (212) 944-2089
E-mail: info@caribnewsconference.com

Item #12

CARIB NEWS FOUNDATION is organized to provide education and information about the Caribbean in the area of Business, Education, Health and Culture, Promote Good neighborly within the United States and the hemisphere.

The participants are selected to participate in the various workshops during the Conference based on their demonstrated interest, expertise and assignment in the United States Congress.

Organized by Carib News Foundation. A non-profit project 501-C3 corporation

Exhibit 19

WORKING DOCUMENT

27th Annual Caribbean Multi-National Business Conference Program
Antigua & Barbuda

Thursday November 8, 2007

12:00noon - 5:00pm : CONFERENCE REGISTRATION - COMMUNITY OUTREACH PROGRAM

Venue : WTO - RULES BASED TRADE & POVERTY REDUCTION

Theme : Hon. Charles Rangel - Member of Congress

Speakers : Hon. Maurice Waters - Member of Congress.
Hon. Dr. Errol Cort - Minister of Finance & The Economy

Moderator : Wallace Ford

Facilitator : MIC Jenkins

Sponsor : ED

6:00 - 7:30pm

Venue : Sandals Grand

Theme : OPENING RECEPTION

Sponsor : CELEBRATING DIASPORA TIPS Antigua Government



09-2567 0200



Sponsors: **Shirivea Housing**
Faye A. Rodney - President CARIB NPWS
Theresa Clarke - Member of Congress
Shirivea Housing
Sandals Grande
COLLABORATIVE STRATEGIES
SANDALS
Hon. Nick Ferris - New York State Assemblyman
Hon. Ruddy Stewart - Chairman, Sandals
Hon. Ed Towns - Member of Congress
Hon. Harold Lawford - Minister of Tourism & Aviation

10:00pm - 11:00pm : Hospitality Area
 Venue: Sandals Grande
 Sponsors: **Royal Caribbean Bakery**

Friday, November 9, 2007
 8:00am - 8:45am : BREAKFAST - Buffet Style

9:00am - 6:00pm : CONFERENCE REGISTRATION

9:00am - 10:15am : OPENING CEREMONIES

Venue: Sandals Grande - Main Ballroom



09-2567 0201

Theme: **CEMENTING DIASPORA TIES, COLLABORATIVE STRATEGIES**

OLYMPIAN/MACY SAKI

Investment

Speakers:

Ed E. Ivey

Karen Rogkhi-Towne

Ed Goldberg

Marie Long

Harold Duke - NAACP

Hon. Donna Christensen - Member of Congress

Hon. Carolyn Cheeks Kilpatrick - Member of Congress

Ambassador Andrew Young

Hon. Louise Lake Lack - Governor General of Antigua

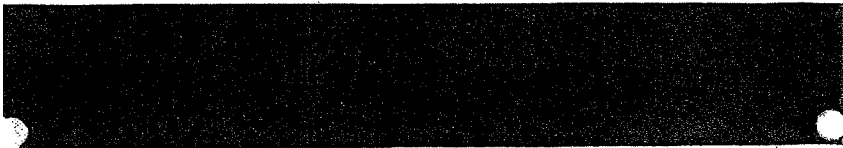
OR

Prime Minister Hon. Baldwin Spencer

Ribbon Cutting

10:30am - PRESENTATION

Theme: **DEVELOPMENT BANKS, PRIVATE DEBT AND EQUITY**



Venue: Sandals Grande
 Sponsors: Citi
 Organized by: Caribbean Bankers Association
 Speaker: Hon. William Lacy Clay - Member of Congress
 Hon. Humpalou Bayart - President AGU
 Caribbean Minister of Finance - TUD
 12:00noon - 7:15pm

Theme: NATIONAL SECURITY: A PRE-CONDITION FOR SUCCESS

Venue: Sandals Grande
 Sponsors: HSBC

Moderator: Dr. Basil Wilson

Remarks: Reginald Canal

Keynote Speaker: Hon. Hennie Thompson - Member of Congress

Panellists:
 Hon. William Lacy Clay Jr. - Member of Congress
 Hon. Donna Christensen - Member of Congress
 Hon. Yvette Clarke - Member of Congress
 Hon. Colin V. A. Doniak - Minister of Justice

Attorney Sanford R. ...

OVERCOME - CHALLENGES

Dr. Edlann O. Jackson, President Medgar Evers College

Hon. Donald Payne - Member of Congress

Hon. G. K. Butterfield - Member of Congress

LUNCH

CARIBBEAN TRADE COMPETITIVENESS AND POSITIONING

Theme

Venue - Sandals Grande

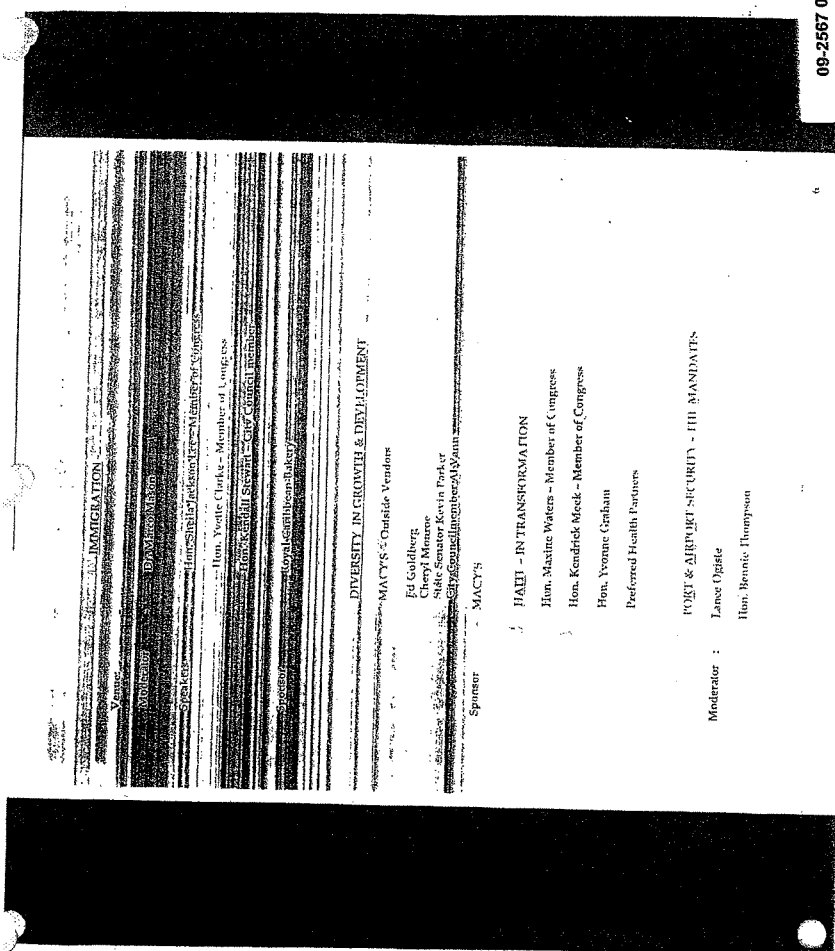
Sponsors - Goodworks International

Remarks - Carlton Masters

Keynote Speaker - Hon. Billie Miller - Minister of Foreign Affairs & Foreign Trade

Hon. Charles Rangel - Member of Congress

2:00pm - 4:00pm - ROUND TABLES



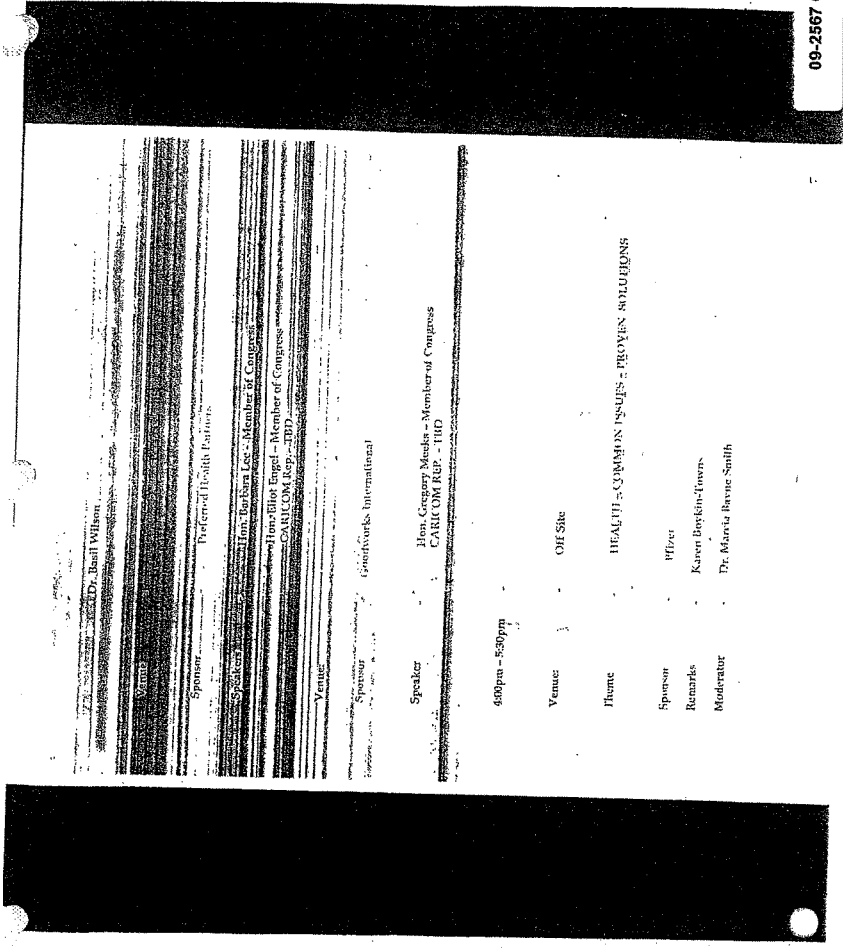
09-2567 0204

IMMIGRATION
 Sponsor: [Redacted]
 Moderator: [Redacted]
 Hon. Yvonne Grubbs - Member of Congress
 Hon. Maxine Waters - Member of Congress
 Hon. Kendrick Meek - Member of Congress
 Hon. Yvonne Grubbs
 Preferred Health Partners

MACT'S Outside Vendors
 Ed Goldberg
 Chief of Staff
 State Senator Kevin Parker
 City Councilmember Alyssa
 [Redacted]

MACT'S
HAEL - INTRANSFORMATION
 Hon. Maxine Waters - Member of Congress
 Hon. Kendrick Meek - Member of Congress
 Hon. Yvonne Grubbs
 Preferred Health Partners

WEST & AIRPORT SECURITY - IIR MANDATES
 Moderator: Lance Ogilvie
 Hon. Dennis Thompson



... Dr. Basil Wilson ...

Venue ... Preferred Health Partners ...

Sponsor ... Preferred Health Partners ...

Speakers ...

Hon. Barbara Lee - Member of Congress

Hon. Bill Engel - Member of Congress

CARICOM Rep. - TDD

Venue ...

Speakers ...

Healthworks International

Speaker Hon. Gregory Meeks - Member of Congress
 CARICOM REP. - TDD

4:00pm - 5:30pm

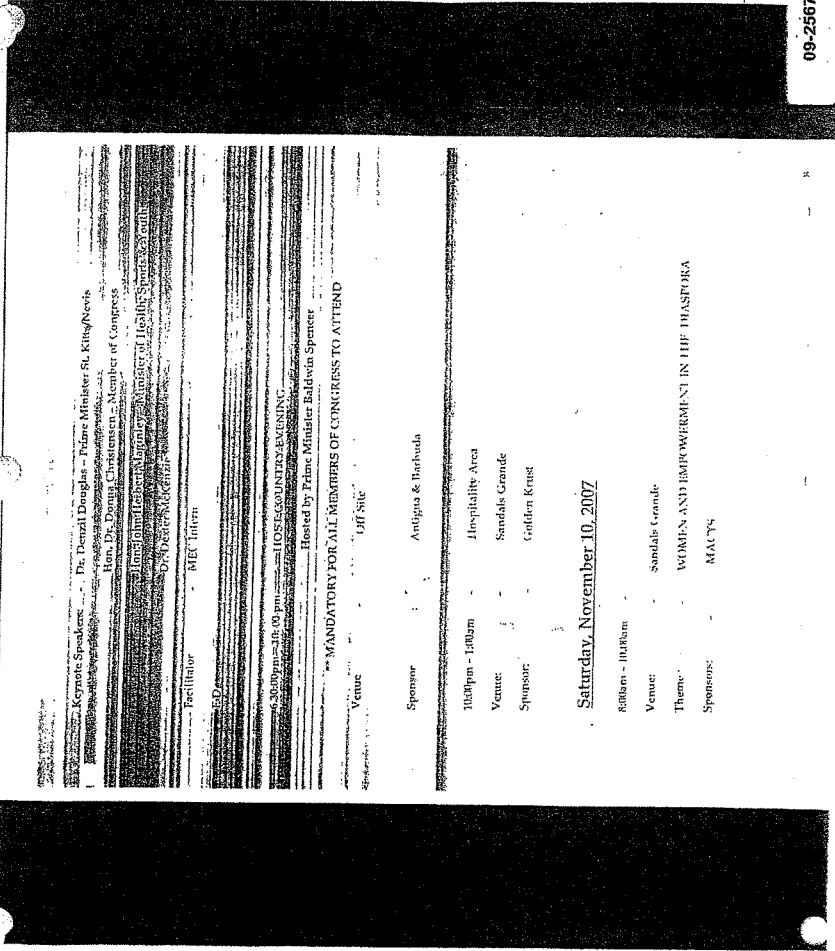
Venue Off Site

Theme HEALTH - COMMON ISSUES - PROVEN SOLUTIONS

Sponsor Pfizer

Remarks Karen Baptista-Town

Moderator Dr. Maria Bayne-Smith



09-2567 0206

Keynote Speakers: Dr. David Duggan - Prime Minister St. Kitts/Nevis
 Hon. Dr. Donna Christian - Member of Congress
 Hon. John Robert Laguarda - Minister of Health, Sports & Youth
 Dr. Doreen George - Director General

Facility: MET Forum

TO PROVIDE TO THE HOUSE COUNTRY EXHIBIT
 Proposed by Prime Minister Baldwin Spencer

MANDATORY FOR ALL MEMBERS OF CONGRESS TO ATTEND

Venue: MET Site

Sponsor: Antigua & Barbuda

Venue: Hospitality Area

Sponsor: Sandals Grande

Sponsor: Golden Krust

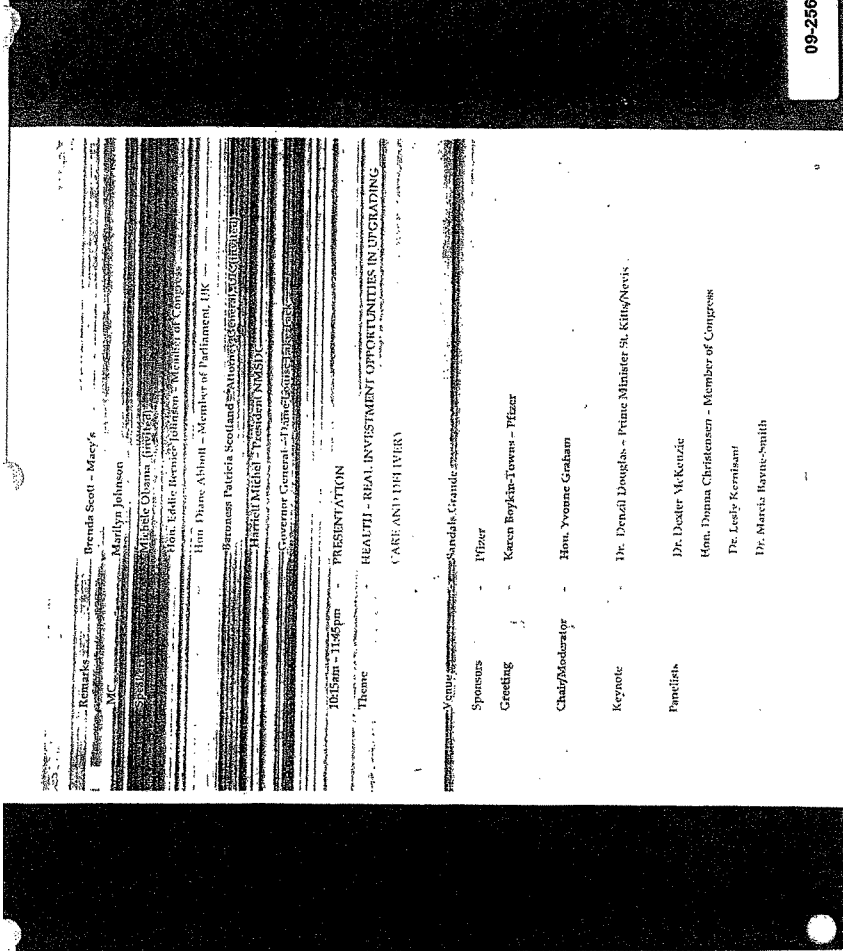
Saturday, November 10, 2007

8:00am - 10:00am

Venue: Sandals Grande

Theme: WOMEN AND EMPOWERMENT IN THE CARIBBEAN

Sponsors: MATYS



Remarks: Brenda Scott - Macy's
 MC Marilyn Johnson
 Michele Obama (invited)
 Hon. Edou Bernier, Hon. Edou Bernier, Member of Congress
 Hon. Diane Abbott - Member of Parliament, UK
 Baroness Patricia Scotland - Ambassador General of Scotland
 Harriet Michel - President NIMSD
 Governor General James Gowriepaul

10:55am - 11:45pm - PRESENTATION
 Theme: HEALTH - REAL INVESTMENT OPPORTUNITIES IN UPGRADING
 CASE AND DELIVERY

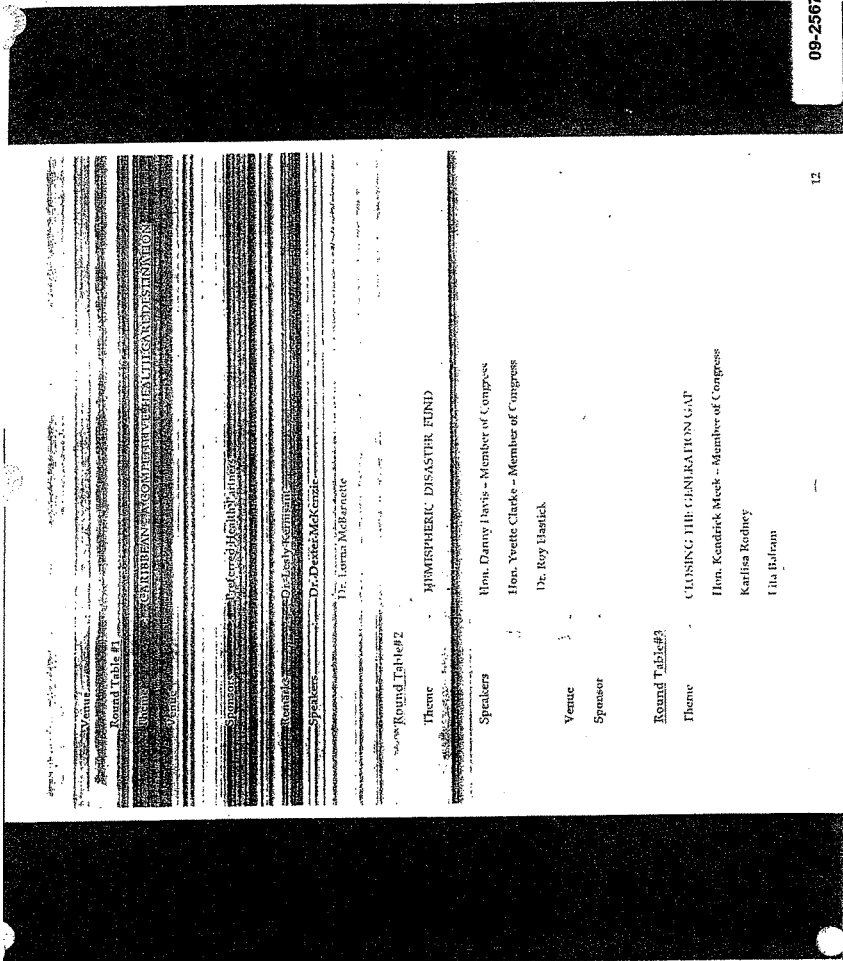
Sponsors: Pfizer
 Greeting: Karen Boykin-Towne - Pfizer
 Chair/Moderator: Hon. Younne Graham
 Keynote: Dr. Denzil Douglas - Prime Minister St. Kitts/Nevis
 Panelists: Dr. Dexter McKenzie
 Hon. Donna Christensen - Member of Congress
 Dr. Lesly Kernisan
 Dr. Marcia Harris-Smith

Caribbean persons...
 TRAVEL & TOURISM REVISION - THE CARIBBEAN
 CATALYST
 Venue: Sandals Grande
 Sponsors: AMERICAN AIRLINES, SANDALS
 Chair/Moderator: Dr. Ed Truax
 Speakers: Hon. Gregory Meeks - Member of Congress
 Hon. Keith Ellison - Member of Congress
 Hon. Allan Chastagnol - Minister of Tourism, St. Lucia
 Hon. Harold Lovell, Minister of Tourism, Antigua & Barbuda

TECHNOLOGY & COMMUNICATION -
 SHARING

Venue: Sandals Grande
 Sponsors: AT&T
 Remarks: Marie Longt
 Keynote Speakers: Hon. Ed Truax - Member of Congress
 Hon. Eddie Bernice Johnson - Member of Congress
 Dr. Edmund Marworn - Member of State

12:00noon - 1:15pm -



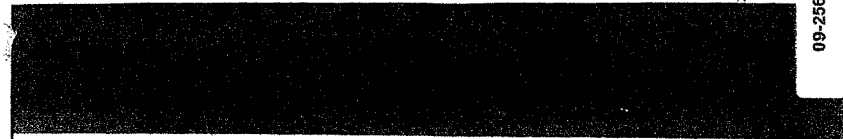
Round Table #1
 UNITED STATES COMMERCE DEPARTMENT
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MEMORPHERIC DISASTER FUND

Speakers
 Hon. Danny Iavis - Member of Congress
 Hon. Yvette Clarke - Member of Congress
 Dr. Roy Harlick

Venue
 Sponsor

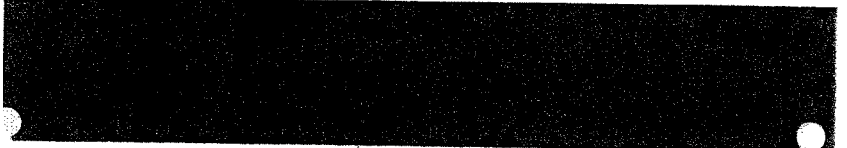
Round Table #3
 Theme
 CLOSING THE GENERATION GAP
 Hon. Kendrick Meek - Member of Congress
 Karissa Redkey
 Ulla Balsam

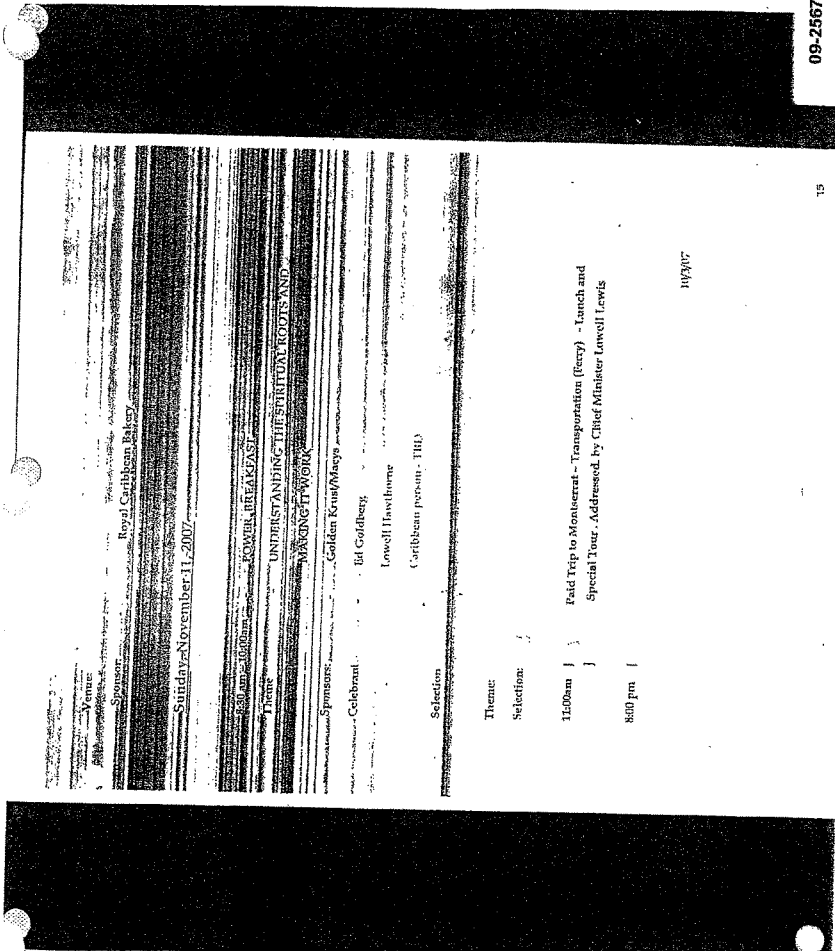


Sabritas Hearing
 Winthrop Williams
 PASSPORT & ADMINISTRATIVE CONSTRAINTS ON TOURISM
 American Airlines
 Hon. Gregory Meeks - Member of Congress
 Hon. Harold Lowell - Member of Congress
 Mr. Irvell Williams
 SPONSOR : CANIB NEWS
 \$10pm - 5:30pm
 EVALUATION - ACCESS AND COLLABORATION
 OF SITE
 CITY
 Moderator: Michael Flanigan
 Speakers: Dr. Edison Jackson - President Medgar Evers College
 Hon. Danny Davis - Member of Congress
 Hon. David M. Dinkins - Former Mayor New York City
 Hon. Eddie Bernice Johnson - Member of Congress
 Hon. Bertrand Joseph



Facilitator: MIC, Hon
 ED
 6:30 - 7:30 pm GALA RECEPTION
 Venue: AYER-HISCO
 Speaker: Hon. Bill Miller, Minister of Foreign Affairs
 Minister of Government, Angus
 7:30 - 10:00 pm GALA DINNER & AWARDS
 Venue: CITYMUNITY/UTZER
 Sponsors: Hon. Charles Rempel - Member of Congress
 Speakers: Hon. James Cloyd - Member of Congress
 Keynote Speaker: Prime Minister Hon. Baldwin Spencer
 Presentation of the Marcus Garvey "Bridge Builder" Awards
 Hospitality Area
 10:30pm - 1:00am





Name: _____
 Sponsor: _____
 Sunday November 11, 2007
 8:00 am - 10:00 am
 COVER RELEASE
 UNDERSTANDING THE ROOTS AND
 MANAGING WORK
 Sponsors: _____ Golden Krus/Macy's _____ Ed Goldberg
 Lowell Hawthorne
 Caribbean person: THJ

Theme:

Selection: /

11:00am | } Paid Trip to Montserrat - Transportation (Tery) - Lunch and
 Special Tour. Addressed by Chief Minister Lowell Lewis
 8:00 pm | }

10307

OFF-PUBLIC SCHEDULE - MANDATORY FOR MEMBERS OF CONGRESS

Friday, November 10, 2007

5:30 - 6:30 p.m. - Private Welcome Reception with Governor General

Saturday, November 10, 2007

11:00 a.m. - 1:00 p.m. - Closed Door Meeting (Mandatory for all Members)

Private Meeting with Local Elected Officials and the Business Community

Secretary of State - Confidential

Secretary of State - Confidential

Secretary of State - Confidential

Secretary of State - Confidential

Secretary of State - Confidential

Secretary of State - Confidential

Secretary of State - Confidential

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Secretary of State - Confidential

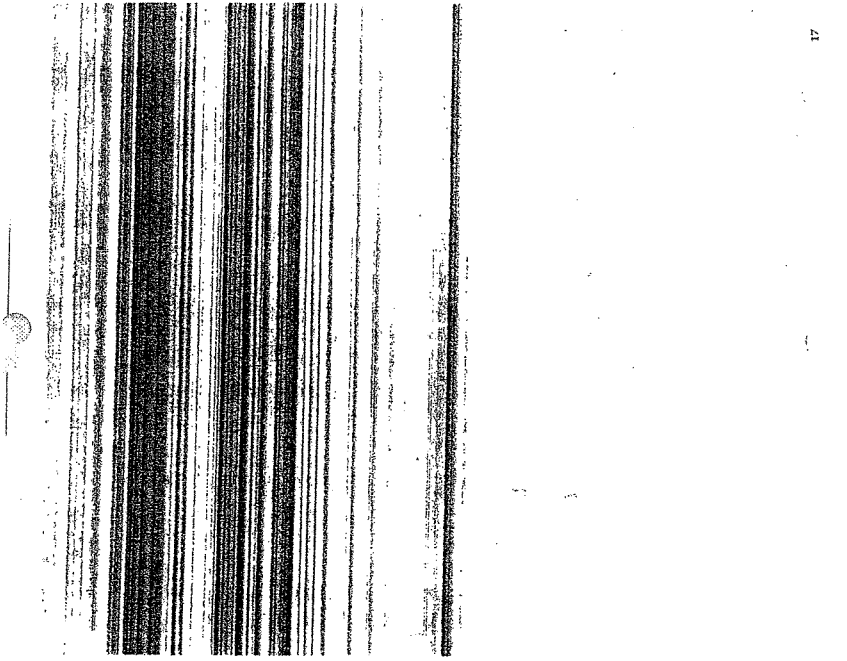
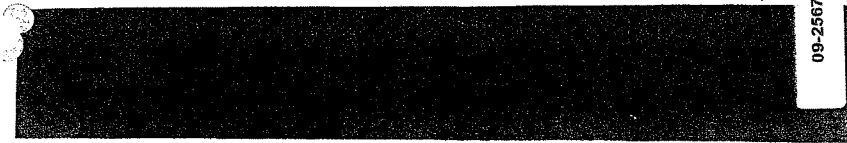
Secretary of State - Confidential

Secretary of State - Confidential

Secretary of State - Confidential

Secretary of State - Confidential

09-2567 0215



17

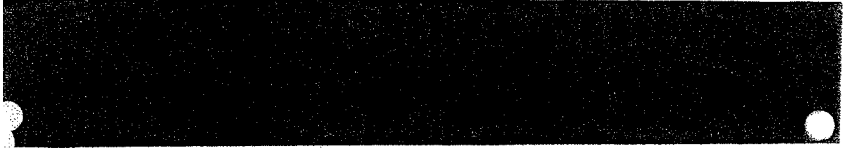


Exhibit 20

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re: Representative 1 from Macy's
Review #: 09-6333; 09-2567; 09-4403; 09-3698; 09-2222
Date: May 27, 2009
Location: 11 Penn Plaza
New York, NY 10001
Time: 11:10pm to 12:00 p.m. (approximately)
Participants: Leo Wise
Omar Ashmawy

Summary: Representative 1 from Macy's is the Senior Vice President of Government and Consumer Affairs and Diversity Vendor Development at Macy's, Inc. He was interviewed pursuant to Review 09-2567; 09-4403; 09-3698; 09-6333; and 09-2222. We requested an interview with Representative 1 from Macy's and he consented to an interview. Representative 1 from Macy's made the following statements in response to our questioning:

1. Representative 1 from Macy's was given an 18 U.S.C. § 1001 warning and consented to an interview. Representative 1 from Macy's signed a written acknowledgement of the warning. [attached]
2. Representative 1 from Macy's met Karl and Faye Rodney in 1996. As a result of the large Caribbean Community in New York City and Macy's commercial interests in the Caribbean region, Representative 1 from Macy's asked Macy's advertizing division to consider the CaribNews newspaper.
3. The first conference he attended was in 1998 in St. Lucia. He attended as a participant. At the time, Macy's was considering a store in Puerto Rico and so Representative 1 from Macy's was especially interested in business in the region. He was impressed by how many government officials from the Caribbean region were present at the conference and by what they had to say about developing relationships with the United States.

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

4. In the ensuing years, Macy's became a sponsor. The conference was a place where the company looked for vendors and designers. It was also a place where they could hear from U.S. legislators about their thoughts on the region. It was also a place for Representative 1 from Macy's to connect with U.S. companies who were attending.
5. Macy's first sponsored the conference in 2000. Over the years they have sponsored the event on an annual basis at varying levels, ranging from \$10,000 to \$35,000. As women's issues are particularly important to Macy's, given their clientele, their sponsorship focuses on the conference's "Women's Power Breakfast." The event was described as very lavish. All attendee of the breakfast also get a Macy's tote bag.
6. In 2008, Macy's contribution to the conference was \$35,000 in cash and an in-kind contribution of 400 tote bags. The total value of the in-kind contribution was \$4,620. The money was earmarked specifically for the conference.
7. As a sponsor, Macy's was given the opportunity to have a representative make opening remarks, to have representation at the Women's Power Breakfast, have input into who the speaker at the breakfast will be, and attend the closed door session with Members of Congress and officials from the Caribbean governments. Representative 1 from Macy's did in fact attend the closed door session in 2008. He recalled that other corporate sponsors also attended the meeting, but he could not recall which ones.
8. Representative 1 from Macy's recalled interacting with Representative Payne, Representative Kilpatrick, Representative Thompson, Representative Rangel, and Delegate Christensen. His interactions were all social in nature.
9. Representative 1 from Macy's was not aware of any other events sponsored by or planned by the CaribNews Foundation. With the exception of the conference, he was not aware of any other instances when Macy's supported a CaribNews Foundation event. Given Representative 1 from Macy's position within the company, it is very likely he would know if Macy's had done so.

I prepared this Memorandum of Interview on May 28, 2009 after interviewing Representative 1 from Macy's on May 27, 2009. I certify that this memorandum contains all pertinent matter discussed with Representative 1 from Macy's on May 27, 2009.

Omar Ashmawy
Investigative Counsel

OFFICE OF CONGRESSIONAL ETHICS
U.S. HOUSE OF REPRESENTATIVES

18 U.S.C. § 1001 ACKNOWLEDGEMENT

I have been provided with a copy of the text of section 1001 of title 18, United States Code (popularly known as the false Statements Act) and hereby acknowledge that it applies to any testimony or documents I provide to the Office of Congressional Ethics.

Name: 

Signature: 

Date: 5/29/08

For Office Use:

Review(s) No. _____

Exhibit 21

Updated Schedule
for Carib News PAGE 13

19/24/2007 19:06 21254-02089

WORKING DRAFT 10/22

12th Annual Caribbean Multi-National
Business Conference Program
Antigua & Barbuda

Thursday, November 8, 2007

12:00noon- 6:00pm : CONFERENCE REGISTRATION -

8:00 - 6:30am COMMUNITY OUTREACH PROGRAM
Venue: Multi-Purpose Cultural Centre - Ferry Bay, St. John's
Theme: WTO - RULES BASED TRADE & POVERTY REDUCTION
Speakers: Hon. Charles Rangel - Member of Congress
Hon. Maxine Waters - Member of Congress
Hon. Dr. Errol Cort - Minister of Finance & The Economy
Moderator: Tony Bust

6:30- 7:30pm OPENING RECEPTION
Venue: Sandale Grande - Main Ballroom
Theme: CEMENTING DIASPORA TIES
MC: Judge Sylvia Hinds-Rodriguez
Speakers: Rye A. Rodney - President CARIB NEWS
Hon. Yvette Clarke - Member of Congress

7:30 - 9:30 pm
Themes: COLLABORATIVE STRATEGIES

Venue: Sandals Grande - Main Ballroom
Moderator: Hon. Nick Perry, New York State Assemblyman
Speakers: Hon. 'Butch' Stewart, Chairman, Sandals
 Hon. Ed Towns - Member of Congress
 Hon. Hansid Lovell - Minister of Tourism & Aviation

1000pm - 1000am: Hospitality Area
Venue: Sandals Grande - Reflective Pool

Friday, November 9, 2007

8:00am - 8:25am BREAKFAST - Buffet Style

8:00am - 8:00pm	CONFERENCE REGISTRATION
------------------------	--------------------------------

9:00am - 10:15am OPENING CERIMONIES

Venue: Sandals Grande - Main Ballroom
Theme: CEMENTING DIASPORA TIES, COLLABORATIVE STRATEGIES

Remarks:

 - Edn Bye
 Dr. Lowell Lewis, Chief Minister
 Montserrat
 Karen Boykin-Townes
 Ed Goldberg
 Mirie Long
 Hazel Daker - NAACP
 William Thompson, NYC Comptroller
 Commissioner Sarah Wesco-Williams, Leader of Govt. St. Maarten
 Guestings

Speakers: Hon. Errol Cost - Minister of Finance & The Economy
 Hon. Dorcas Christensen - Member of Congress
 Hon. Carolyn Cheeks Klipfisch - Member of Congress

Ambassador Andrew Young
 Hon. Louise Lake Task - Governor General of Antigua
 OR
 Prime Minister Hon. Baldwin Spencer

Ribbon Cutting

10:00am - 11:45am . PRESENTATION
 Theme: DEVELOPMENT BANKS, PRIVATE DEBT AND EQUITY
 Venue: Sandals Grande
 Chair/Moderator: Dr. Betteque Higgins
 Speaker: Hon. Madine Watford - Member of Congress
 Hon. Compton Bourne - President, CDB
 Mr. Milton Lawrence, Chairman Financial Services Corporation
 Mr. Rudolph Caryl
 Hon. Dr. Dennis Douglas, Prime Minister/Minister of Finance, St. Kitts

10:30 - 11:45am CULTURE - PROMISE & POTENTIAL IN BUSINESS
 Remarks:
 Speaker: Professor Rex Nettleford
 Hon. Howard Dutton
 Patrick Payne
 Hon. Harold Lovell, Minister of Culture

12:00noon - 1:15pm
 Theme: NATIONAL SECURITY: A PRE-CONDITION FOR SUCCESS
 Venue: Sandals Grande
 Moderator: Leyland Hazelwood
 Remarks: Reginald Chnal

Keynote Speaker: Hon. Bernice Thompson - Member of Congress
 Panelists: Hon. Dwyer Aschmann, Minister of National Security
 Hon. Yvette Clarke - Member of Congress
 Hon. Colin V. A. Derrick - Minister of Justice
 Attorney Sanford Rubenstein

12:00noon -1:15pm
 Theme: EDUCATION - U.S AND CARIBBEAN SYNERGIES TO
 OVERCOME CHALLENGES
 Remarks: Collin Ward
 Speakers: Dr. Edison O. Jackson, President Medgar Evers College
 Hon. Donald Payne - Member of Congress
 Hon. Bertrand Joseph, Minister of Education

1:30pm -2:30pm
 Theme: FINANCE COMMUNITY ORGANIZATION'S - VALUE
 AND ROLE
 Remarks: Michael Zanigan
 Speakers: Eric Ivey - CFTI
 Hon. William Thompson, New York City Comptroller

3:00pm - 4:00pm
 Theme: ROUND TABLES
 IMMIGRATION -
 Remarks: Soudade Grande
 Moderator: Dr. Marco Mason

Speakers - Hon. Barbara Lee - Member of Congress
 Hon. Yvette Clarke - Member of Congress
 Hon. Keith/JJ Stewart - City Council member

DIVERSITY IN GROWTH & DEVELOPMENT

MACY'S - Outside Vendors

Ed Goldberg
 Cheryl Monroe
 State Senator Kevin Parker
 City Councilmember Inez D'Elia

HAITI - IN TRANSFORMATION

Hon. Maxine Waters - Member of Congress
 Hon. Yvonne Garreau
 Ambassador Andrew Young

PORT & AIRPORT SECURITY - THE MANDATES

Moderator : Mr. Lance Oglet
 Hon. Benise Thompson
 Hon. Dwert Aelaphan

Venue Sendals Grande

Participant Federated Health Partners

Speakers Hon. Barbara Lee - Member of Congress

Venue

Speaker Hon. Gregory Meeks - Member of Congress ?
CARICOM REP. - TBD

5:00pm - 6:50pm
Venue: Multipurpose Cultural & Exhibition Centre - Ferry Bay

Theme HEALTH - COMMON ISSUES - PROVEN SOLUTIONS - MOVE
Healthy Eating, Healthy Living

Remarks Ms. Karen Boykin-Townes

Moderator Dr. Merril Bayne Smith

Keynote Speakers: Dr. Densil Douglas - Prime Minister St. Kitts/Nevis
Hon. Dr. Martin Valdes-Preferred Health Partners
Hon. Jehu Herbert Maginley - Minister of Health, Sports & Youth
Dr. John Falcaer
Hon. Diane Watson, Member of Congress

6:30/7pm - 10:00 pm HOST COUNTRY EVENING
Hosted by Prime Minister Baldwin Spencer

Venue Multipurpose Cultural and Exhibition Centre - Ferry Bay

10:00pm - 11:00am Hospitality Area

Venue: Bandula Granda - Reflection Pool

Saturday, November 10, 2007

8:00am - 10:00am

Venue: Sandals Grande - Main Ballroom
 Theme: WOMEN AND EMPOWERMENT IN THE DIASPORA

Remarks: Brenda Scott
 MC: Marilyn Johnson
 Speakers: Hon. Diana Abjoff, MP UK
 Commissioner Sarah Westcott-Williams,
 Hon. Carlisle Chicks Kilpatrick, Member of Congress
 Hon. Edlyn Betrice Johnson - Member of Congress
 Dr. Marcelia Maxwell
 Ms. Toni Kay
 Governor General - Dame Louise Lake Tak - check
 Ms. Luanne McEwen, President/CEO ICAI
 Commissioner Westcott-Williams, Leader of Government

10:15am - 11:45pm

PRESENTATION
 Theme: HEALTH - RURAL INVESTMENT OPPORTUNITIES IN UPGRADING
 CARE AND DELIVERY
 Venue: Sandals Grande
 Greeting: Karen Boydin-Townes - Pfizer
 Chair/Moderator: Hon. Yvonne Graham
 Keynote: Dr. Dewell Douglas - Prime Minister St. Kitts/Nevis

7

Panelists	Hon. John Herbert McGinley, Minister of Health Dr. Marcia Byne-Smith Dr. Carl Karel Pierre, Professor Health Partners
10:15am-11:05am	
Theme	TRAVEL & TOURISM EXPANSION - THE DIASPORA AS CATALYST
Venue	Sandale Grande
Chair/Moderator	Mr. Lloyd Williams, GHCC
Speakers	Hon. Lura Richardson - Member of Congress Hon. Harold Lovell, Minister of Tourism, Arts & Barbuda Hon. Howard Nelson, Director Schomburg Center
12 noon-1:15pm	PRESENTATION
Theme	TECHNOLOGY & COMMUNICATION - SHARING
Venue	Sandale Grande
Remarks	Mr. Marc Long
Keynote Speakers	Hon. Ed Towne - Member of Congress Hon. Edite Barnes Johnson - Member of Congress Dr. Edmund Mousour - Member of State Dr. Emmanuel Gonzalez
12:00pm - 1:15pm	
Theme	INTEGRATING THE DIASPORA IN BUSINESS - INVESTORS MANAGERS, MENTORS & TRAINERS

Venue:	Sandals Grande
Moderator	Roy Hasick
Participant	HIBC
Remarks	Mr. Javist Evans
Speakers	Hon. Coompton Buxton Hon. Adolpho Carrion, Bronx Borough President Hon. Carolyn Cheeks Kilpatrick - Member of Congress Hon. Professor Rex Nettleford
1:30 - 2:00 p.m.	LUNCH
Theme	CARIBBEAN TRADE COMPETITIVENESS AND POSITIONING
Venue	Sandals Grande
Remarks	Wallace Ford - Goodworks International
Keynote Speaker	Hon. Billie Miller - Minister of Foreign Affairs & Foreign Trade Hon. Charles Rangel - Member of Congress
2:30pm - 6:30pm	
Optional	
8:00pm - 2:00pm	ROUND TABLES
Venue	Sandals Grande

Round Table #1

Theme CARIBBEAN - A COMPETITIVE HEALTH CARE DESTINATION

Venue

Remarks Dr. Lesly Kourilant

Speakers Dr. Dexter McKeefe
Hon. Yvonne Graham

Round Table#2

Theme HEMISPHERIC DISASTER FUND

Venue Sandals Grande

Speakers Hon. Yvette Clarke - Member of Congress
Mr. Leyland Hazlewood
Mr. Emmanuel Gonsalves

Participant

Round Table#3

Theme CLOSING THE GENERATION GAP

Speaker Hon. Yvette Clarke - Member of Congress
Kathia Rodney
Lisa Bahram
Sabrina Hosny
Wintropo Wellington

Venue Sandals Grande

Participant

Round Table #4

Theme PASSPORT & ADMINISTRATIVE CONSTRAINTS ON TOURISM

Venue Sandals Grande

Speakers Hon. Harold Lovell - Minister of Tourism
Mr. Lloyd Williams, GHCC
Hon. Dairyl Thomas, State Assemblyman

5:00pm - 6:50pm COMMUNITY OUTREACH -
EDUCATION & YOUTH DIRECTION - ACCESS AND
COLLABORATION

Venue: Multipurpose Cultural & Exhibition Centre

Moderator: Michael Bavigua

Speakers: Dr. Edwin Jackson - President Medgar Evers College
Hon. David M. Dinkins - Former Mayor New York City
Hon. Eddie Bernice Johnson - Member of Congress
Hon. Bertrand Joseph

6:50 - 7:30pm GALA RECEPTION

Venue: Sandals Grande

Speaker: Hon. Stephanie Tubbs-Jones, Member of Congress
Hon. Billie Miller, Minister of Foreign Affairs,
Minister of Government in Antigua

Themed

7:30 - 10:00 pm : GALA DINNER & AWARDS
 Theme
 Venue Sandale Grande - Main Hallroom
 Speakers Hon. Charles Rangel - Member of Congress
 Hon. Maxine Waters - Member of Congress
 Keynote Speaker Prime Minister Hon. Baldwin Spencer
 Presentation of the Marcus Garvey "Bridge Builder" Awards

Hospitality Area

10:30pm - 1:00am

Venue:

Sunday, November 11, 2007

8:30 am - 10:00am POWER BREAKFAST
 Theme UNDERSTANDING THE SPIRITUAL ROOTS AND
 MAKING IT WORK
 Celebrant Ed Goldberg
 Lowell Hawthorne
 Caribbean person - TBD

Selection:

Theme:

Selection:

10/16/07

Exhibit 22

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re: Staff Member 1 of Congressman Rangel's Office
Review #: 09-6333; 09-2567; 09-4403; 09-3698; 09-2222
Date: May 27, 2009 and May 28, 2009
Location: Washington, DC (via telephone on May 27, 2009) and at Rayburn HOB 354 (on May 28, 2009)
Time: 4:10pm to 5:30 p.m. (approximately) and 3:30pm to 4:00pm (approximately)
Participants: Leo Wise
Omar Ashmawy

Summary: Staff Member 1 of Congressman Rangel's Office is currently the chief of staff of Representative Charles Rangel, a Member of the United States House of Representatives representing the Fifteenth District of New York. He was interviewed pursuant to Review 09-2567; 09-4403; 09-3698; 09-6333; and 09-2222. We requested an interview with Staff Member 1 of Congressman Rangel's Office and he consented to an interview. Staff Member 1 of Congressman Rangel's Office's counsel was present. Staff Member 1 of Congressman Rangel's Office made the following statements in response to our questioning:

1. Staff Member 1 of Congressman Rangel's Office was given an 18 U.S.C. § 1001 warning and consented to an interview. Staff Member 1 of Congressman Rangel's Office signed a written acknowledgement of the warning. [attached]
2. Staff Member 1 of Congressman Rangel's Office did not attend the 13th Annual Caribbean Multi-National Business Conference although he received an invitation. In response to a Request for Information by OCE, Staff Member 1 of Congressman Rangel's Office looked for Representative Rangel's invitation to the conference, but could not find it. He had thought Representative Rangel had received one, but because he could not find the invitation he now thinks that Representative Rangel did not receive one.

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3. Representative Rangel could have been invited orally as he has been attending the conference for years and was seen almost as a partner. He attends the conference because he is dedicated to strengthening the relationships between the Caribbean community, the African-American community of New York City and in general, and the United States.
4. The question of whether Representative Rangel would attend the conference in 2008 was a difficult one because of the negative press he had received throughout the preceding summer. Representative Rangel was cautious about attending because he didn't want to be a target for additional negative publicity, but Staff Member 1 of Congressman Rangel's Office and others on the Member's staff argued that he should go to the conference. They argued that if Representative Rangel did not attend he would be rejecting the friends with whom he helped build the conference and that the Member had to stand up and do the right thing despite the possible negative publicity.
5. Ultimately, Staff Member 1 of Congressman Rangel's Office and his staff persuaded the Member to attend. Representative Rangel decided to keep a low profile and, unlike in past years, staff would not attend the conference with the Member.
6. Staff Member 1 of Congressman Rangel's Office stated that the CaribNews Foundation invited the Member. The CaribNews Foundation is the charitable arm of the newspaper. When the rules changed in 2007 and corporations could not be involved as before – i.e. direct contributions to the conference – there was “talk” about how to do the conference in light of the new rules.
7. According to Staff Member 1 of Congressman Rangel's Office, there was “talk” that the Rodneys needed an entity to create a common fund so that the corporate money could be used to pay for the conference and that the CaribNews Foundation could be used for that purpose.
8. Staff Member 1 of Congressman Rangel's Office initially stated that he did not remember how he was aware of this “talk.” He stated that part of it was his reading of the rules and the supplemental material about how things get done. He then stated that “we” celebrated when Representative Susan Tubbs-Jones was made the chair of the Standards Committee in 2007 because she would try to create a way for Members of Congress to continue to attend the conference. Staff Member 1 of Congressman Rangel's Office then stated that he was made aware of the “talk” through the Rodneys and that the Rodneys told Staff Member 1 of Congressman Rangel's Office that Representative Tubbs-Jones was going to have her counsel, Dawn Kelly-Mobley, find a way to make the conference work. The Members would have a few more hoops to go through but “we” would find a

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- way. Representative Tubbs-Jones would let Ms. Mobley know the conference was a priority and tell her to make it possible. Representative Tubbs-Jones made Ms. Mobley the point of contact on the issue of the conference.
9. Staff Member 1 of Congressman Rangel's Office stated that Representative Rangel also mentioned that Representative Tubbs-Jones told him something similar. Staff Member 1 of Congressman Rangel's Office stated that there was talk about "keeping the conference going." He also stated that "They gave us the framework to keep the conference going." "They" referred to Ms. Mobley and Representative Tubbs-Jones.
 10. Staff Member 1 of Congressman Rangel's Office did not remember any specific conversations with Ms. Mobley, but he would have had them because he would have wanted to make sure he followed her advice. He stated that the 2007 conversations about Standards Committee finding a way to keep the conference going may have also been with Patricia Louis, the Rodney's office manager.
 11. Regarding the structure of the CaribNews Foundation, Staff Member 1 of Congressman Rangel's Office said that the role of the foundation was more formalized as a way to handle the new rules and that it would have come from the Standards Committee staff. The Rodney's were the first people to describe the new structure to Staff Member 1 of Congressman Rangel's Office following their conversation with Ms. Mobley. The Rodney's told Staff Member 1 of Congressman Rangel's Office that they could easily comply because they had always done the conference through the foundation. The Rodney's told him that it should have always been called the CaribNews Foundation's conference.
 12. Before 2007, Staff Member 1 of Congressman Rangel's Office knew that the corporations had a role in the conference because the format was in part to bring businesses together. Members of Congress would talk policy, but the Members' presence was the glamour part of the conference and a way to attract more people. However, policy was not the central focus of the conference. The central focus of the conference was business and increasing investment in the region. The Members of Congress drew government officials from the various Caribbean governments and these government officials drew the businesses.
 13. Staff Member 1 of Congressman Rangel's Office was aware the involvement of other corporations like AT&T, Macy's, Citi, etc because they were pretty consistent supporters of the conference. It was clear they were supporters of the conference financially.

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14. Staff Member 1 of Congressman Rangel's Office did not talk to Representative Rangel about these matters because the Member does not require that level of detail and does not typically ask for specifics.
15. Staff Member 1 of Congressman Rangel's Office did not remember how he became aware of the 2007 rule changes and did not remember attending any briefings or training about the new rules. He thought he was aware of the limits on the number of days a Member could attend an event paid for by an entity that employs a lobbyist, but he was not certain. Mr. Daley did not think he was aware of rules that made an entity that earmarked money for a trip a sponsor of that trip.
16. In response to the question: At the time of the 2007/2008 conferences, how sponsor was defined? Staff Member 1 of Congressman Rangel's Office stated that the New York CaribNews Foundation was the sponsor of the conference because they were putting on the conference with money from a general fund that would pay for the conference. At that time he became conscious of a need for a 501(c)(3) to be the sponsor.
17. Over the course of several phone calls-- most often with Patricia Louis and Faye Rodney, Karl Rodney's wife -- Staff Member 1 of Congressman Rangel's Office learned that he CaribNews Foundation was going to raise money from their traditional donors and other entities.
18. The government of St. Maarten was the lynchpin of the 2008 conference. They were the conference's host and they had specific requirements, as host, that were financial in nature. For instance, when a host government owns a conference center and/or hotel then they give the rooms and conference space for free. If they do not own space, then they have to arrange with a hotel to give rooms and space to the conference at an affordable amount. Other host government support includes police escorts, airport greeting services, and security services. They also host an opening reception and key components of the conference.
19. Although it was not typical, Staff Member 1 of Congressman Rangel's Office became the scheduler for Representative Rangel's travel to the conference in 2008 because he played a part in convincing him to go. Staff Member 1 of Congressman Rangel's Office made the reservations for the Member, but did not remember how he did it or whether the Representative had an e-ticket or a ticket in some other form. He did not remember receiving any airline itinerary documents, but it would have been common practice for him to receive one.

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20. Staff Member 1 of Congressman Rangel's Office was shown the pre-travel clearance form submitted to the Standards Committee and stated that he filled it out and the Member signed it. He was shown the post-travel disclosure forms that were submitted to the Standards Committee and stated that he filled them out and the Representative signed them.
21. Staff Member 1 of Congressman Rangel's Office initially said he got the information to fill out the post-travel forms from the Rodneys and stated that he remembered getting a memo from the Rodneys with the cost of the various aspects of the trip on it and that the memo was where he got the dollar amounts for the post-travel forms. He was then asked to explain why the numbers on the post-travel form matched the pre-travel form and not the memo from the Rodneys. Staff Member 1 of Congressman Rangel's Office then said that he could not say for sure that he got the numbers from the memo. He did not remember if the numbers were from the memo or from the pre-travel forms. He was not sure if he checked the cost of the airfare against the airline tickets or if he got it from the pre-travel documents or from the memo.
22. Generally speaking, however, Staff Member 1 of Congressman Rangel's Office would not look behind the numbers given by the Rodneys. He would assume the Rodneys were accurate. Staff Member 1 of Congressman Rangel's Office was not certain how it was done, but thought that the accounting for the conference was simple and the information for each Member would be the same. He did not ask the Rodneys for supporting documentation for the numbers on the memo.
23. After the conference, he spoke to Representative Rangel generally about the event. When the article by Susan Crabtree was published there was a lot of talk about the subject of the article with several people. Staff Member 1 of Congressman Rangel's Office did not remember with whom he spoke. He then said that he spoke with the Rodneys and the Member. Overall there was an opinion that there could not be anything substantive to the article because the travel was approved by the Standards Committee. It was true that the corporations were at the conference, but they did not have anything to do with their Washington, DC agenda because that's not who attended the conference. His conversations with Representative Rangel were brief and were limited to reassuring him that the office followed the rules and got approval for the travel.
24. After the OCE review was initiated Staff Member 1 of Congressman Rangel's Office called other members of the Congressional Black Caucus. Representative Rangel asked him to make the calls and to tell them that he would stand by them and offered his help.

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25. Staff Member 1 of Congressman Rangel's Office recalled a conversation with Representative Carolyn Kilpatrick's chief of staff, Kim Rudolph. Ms. Rudolph addressed the comments that Representative Kilpatrick made in which she thanked the sponsors of the conference. Staff Member 1 of Congressman Rangel's Office explained Representative Kilpatrick's statements to OCE by saying that that regardless of who the real sponsor of the event was, when Members thank the corporations it helps the Rodneys put on the conference -- even if the sponsors are not sponsors under the rule. Staff Member 1 of Congressman Rangel's Office also remembered speaking to Shelly Thomas, Delegate Donna Christensen's scheduler, but did not recall the specifics of the conversation.
26. Staff Member 1 of Congressman Rangel's Office was not aware of any limits on a private foundation paying for overseas travel. He did not know whether the CaribNews Foundation was a private foundation or a public charity.
27. Staff Member 1 of Congressman Rangel's Office was shown a copy of Congressman Rangel's itinerary and a receipt for an electronic ticket. Staff Member 1 of Congressman Rangel's Office stated that he did not remember seeing it before, but that the itinerary was the type of document that would typically be placed in the Congressman's briefing book so that he could provide the information at the airport in order to get his ticket. Staff Member 1 of Congressman Rangel's Office also pointed out that the receipt for the electronic ticket was the sort of document that would only be provided after the Congressman checked in for his flight.

I prepared this Memorandum of Interview on May 28, 2009 after interviewing Staff Member 1 of Congressman Rangel's Office on May 27, 2009. I certify that this memorandum contains all pertinent matter discussed with Staff Member 1 of Congressman Rangel's Office on May 27, 2009.

Omar Ashmawy
Investigative Counsel

Exhibit 23



TEL: (212) 944-1991; FAX: (212) 944-2089
 E-MAIL ADDRESS: NYCARIB@AOL.COM;
 CARIBNEWS@ATT.NET

FACSIMILE TRANSMITTAL SHEET

TO:	Kelly Mobley	FROM:	Patricia Louis
COMPANY:	Committee on Standards of official conduct	DATE:	8/20/08
FAX NUMBER:	202-228-7392	TOTAL NO. OF PAGES INCLUDING COVER:	
RE: 2008 MULTINATIONAL BUSINESS CONFERENCE			
<input type="checkbox"/> URGENT <input type="checkbox"/> FOR REVIEW <input type="checkbox"/> PLEASE COMMENT <input type="checkbox"/> PLEASE REPLY <input type="checkbox"/> YOUR INFORMATION			

Following is the completed form and attachments re travel for Members of Congress to attend the 2008 Multinational Business Conference scheduled for November 6-9, 2008 in St. Maarten.

Regards

09-2567 0247

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CN-000112



Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10017
Tel: (212) 944-1991; Fax: (212) 944-2089
E-mail: info@caribnewsconference.com

CARIB NEWS FOUNDATION is organized to provide education and information about the Caribbean in the area of Business, Education, Health and Culture, Promote Good neighborly within the United States and the hemisphere.

The participants are selected to participate in the various workshops during the Conference based on their demonstrated interest, expertise and assignment in the United States Congress.

Organized by Carib News Foundation. A non-profit project 501-C3 corporation

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09-2567 0248

CN-000113

U.S. House of Representatives
Committee on Standards of Official Conduct

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM
(provide directly to each House invitee)

This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers or employees under House Rule XXV, clause 5. A completed copy of the form (and any attachments) should be provided to each invited House Member, officer or employee, who will then forward it to the Committee. The trip sponsor should NOT submit the form directly to the Committee.

Private sponsors are urged to submit this form to each House invitee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the invitee not receiving approval for the trip. The submission of an incomplete form will delay the review process. Before completing this form, sponsors are urged to carefully review the Committee's private travel guidelines and advisory memoranda detailing the rules and restrictions for private travel, as well as the instructions for completing this form. Sponsors should call the Committee with any questions prior to submitting the form. Please type form.

1. Sponsor(s) (who will be paying for the trip): CARIB NEWS FOUNDATION
2. I represent that the trip will not be financed (in whole or in part) by a federally-registered lobbyist or a registered foreign agent (signify "yes" by checking box):
3. I represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip (signify "yes" by checking box):
4. Is travel being offered to an accompanying family member of the House invitee(s)? Yes No
5. Provide names and titles of ALL House invitees; for each invitee, provide explanation of why the individual was invited (include additional pages if necessary): BASED ON COMMITTEE OR SUB-COMMITTEE WHICH IMPACTS US/CARIBBEAN RELATIONS ON WHICH THE MEMBER SERVES.
6. Dates of travel: NOVEMBER 6-8, 2008
7. Cities of departure - destination - return: VARIES - DEPENDING ON MEMBER
8. Attached is a detailed agenda of the activities taking place during the travel (i.e., an hourly description of planned activities) (signify "yes" by checking box):
9. I represent that (check one of the following):
- The sponsor of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965: or
 - The sponsor of the trip does not retain or employ a federally registered lobbyist or registered foreign agent: or
 - The trip is for attendance at a one-day event and lobbyist involvement in planning, organizing, requesting, or arranging the trip was *de minimis* under the Committee's travel regulations.
10. If travel is for participation in a one-day event (i.e., if you checked Question 9(c)), check one of the following:
- One-night's lodging and meals are being offered: or
 - Two-nights' lodging and meals are being offered:
- If "b" is checked, explain why the second night is warranted: _____

09-2567 0249

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CN-000114

11. If the trip is not sponsored by an institution of higher education, I represent that a federally-registered lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip (signify "yes" by checking box):

12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip: CARIB NEWS FOUNDATION (* SEE ATTACHED)

13. Describe each sponsor's organizational interest in the purpose of the trip: THE INTEREST OF CARIB NEWS FOUNDATION IS TO PROMOTE, INFORM, TRADE AND ESTABLISHMENT OF MEANINGFUL CONNECTIONS BETWEEN THE U.S AND THE CARIBBEAN

14. Describe the type and class of the transportation being provided. Indicate whether coach, business-class or first-class transportation will be provided. In addition, for travel via aircraft, please indicate if travel is being offered on a commercial flight, chartered flight or on an aircraft operated or paid for by a carrier not licensed by the Federal Aviation Administration to operate for compensation or hire (i.e., a private aircraft). If first-class fare is being provided, or if travel is via chartered or private aircraft, please provide an explanation describing why such travel is warranted: REGULAR SCHEDULED AIR SERVICE, ECONOMY CLASS

15. I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s). (signify "yes" by checking box):

16. I represent that either (check one of the following):
a. The trip involves an event that is arranged or organized without regard to congressional participation and that meals provided to congressional participants are similar to those provided to or purchased by other event attendees:
b. This trip involves events that are arranged or organized specifically with regard to congressional participation:
If "b" is checked, detail the cost per day of meals (approximate cost may be provided): _____

17. Reason for selecting the location of the event or trip: SEE ATTACHED

18. Name of hotel or other lodging facility: SONESTA MAHO BEACH RESORT

19. Cost per night of hotel or other lodging facility (approximate cost may be provided): \$110.00

20. Reason(s) for selecting hotel or other lodging facility: HAS APPROPRIATE MEETING ROOMS

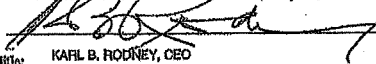
21. TOTAL EXPENSES FOR EACH PARTICIPANT:

<input type="checkbox"/> Actual amounts <input type="checkbox"/> Good faith estimates	Total Transportation Expenses per Participant	Total Lodging Expenses per Participant	Total Meal Expenses per Participant
For each Member, Officer, or employee	410	280	145
For each accompanying family member	410	0	145

	Other Expenses (dollar amount)	Identify Specific Nature of "Other" Expenses (e.g., taxi, parking, registration fee, etc.)
For each Member, Officer, or employee	\$150	Conference Registration
For each accompanying family member	\$ 25	Local transportation

22. I represent that reimbursement for miscellaneous travel expenses for the trip, such as travel to and from airports, security costs, interpreter fees, visa application fees, and similar expenses, will be for actual costs incurred and are necessary for the purpose of the trip (attach "logs" by checking box):

23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: 
 Name and title: KARL B. RODNEY, CEO
 Organization: CARIB NEWS FOUNDATION
 Address: 7 WEST 98th STREET, 8th FLOOR, NEW YORK, NY 10018
 Telephone number: (212) 944-1991
 Fax number: (212) 944-2099
 Email Address: CARIB-DESK@ATT.NET

The Committee staff may contact the above individual above if additional information is required.

If there are any questions regarding this form please contact the Committee at the following address:

Committee on Standards of Official Conduct
 U.S. House of Representatives
 HT-2, The Capitol
 Washington, DC 20515
 (202) 225-7103 (phone)
 (202) 225-7392 (general fax)
 (202) 226-7172 (fax for travel approvals)

Version date 4/2017 by Committee on Standards of Official Conduct

**MEMBERS OF CONGRESS INVITED TO THE
THIRTEENTH ANNUAL MULTI-NATIONAL BUSINESS
CONFERENCE, NOVEMBER 6-9, 2008, ST. MAARTEN, N.A.**

Congresswoman Diane E. Watson
Congressman David Scott
Congressman James Clyburn
Congresswoman Nydia Velazquez
Congressman Charles Rangel
Congressman Donald Payne
Congresswoman Donna M. Christensen
Congressman Edolphus Towne
Congressman G. K. Butterfield
Congressman Gregory Meeks
Congressman Jesse Jackson Jr.
Congressman Keith Ellison
Congressman Kendrick Meek
Congresswoman Maxine Waters
Congressman Melvin Watt
Congressman Robert Scott
Congressman William Lacy Clay
Congresswoman Barbara Lee
Congresswoman Caroline Cheeks Kilpatrick
Congresswoman Corrine Brown
Congresswoman Eddie Bernice Johnson
Congresswoman Sheila Jackson Lee
Congresswoman Yvette Clarke
Congressman Danny Davis
Congressman Bennie Thompson
Congresswoman Laura Richardson

July 2008

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Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10017
Tel: (212) 944-4991; Fax: (212) 944-2089
E-mail: info@caribnewsconference.com

Item #12

CARIB NEWS FOUNDATION is organized to provide education and information about the Caribbean in the area of Business, Education, Health and Culture, Promote Good neighborly within the United States and the hemisphere.

The participants are selected to participate in the various workshops during the Conference based on their demonstrated interest, expertise and assignment in the United States Congress.

Item#17

A Caribbean country whose proximity to other Caribbean Countries makes it conveniently located for delegates from the other Caribbean countries to attend.

Organized by Carib News Foundation. A non-profit project 501-C3 corporation

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**MEMBERS OF CONGRESS INVITED TO THE
13th Annual Multinational Business Conference
St. Maarten, November 6-9, 2008**

Congressman William Lacy Clay
U.S House of Representatives
131 Cannon HOB
Washington, DC 20515
Phone: 202-225-2406
Fax: 202-226-3717

Congresswoman Diane E. Watson
US House of Representatives
125 Cannon HOB
Washington, DC 20515
Phone: 202-225-7084
Fax: 202-225-2422

Congressman Kendrick Meek
U.S House of Representatives
1039 Longworth HOB
Washington, DC 20515
Phone: 202-225-4506
Fax: 202-226-0777

Congressman David Scott
U.S House of Representatives
417 Cannon HOB
Washington, DC 20515
Phone: 202-225-2929
Fax: 202-225-4268

Congressman James Clyburn
US House of Representatives
2135 Rayburn HOB
Washington, DC 20515
Phone: 202-225-3315
Fax: 202-225-9253

Congressman Robert Scott
U.S House of Representatives
1201 Longworth HOB
Washington, DC 20515
Phone: 202-225-8351
Fax: 202-225-8354

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Congresswoman Nydia Velázquez
U.S House of Representatives
2241 Rayburn HOB
Washington, DC 20515
Phone: 202-225-2361
Fax: 202-225-0327

Congressman Charles Rangel
U.S House of Representatives
2354 Rayburn HOB
Washington, DC 20515-3215
Phone: 202-225-4365
Fax: 202-225-0186

Congressman Donald Payne
U.S House of Representatives
2209 Rayburn HOB
Washington, DC 20515
Phone: 202-225-3436
Fax: 202-225-4160

Congresswoman Donna M. Christensen
U.S House of Representatives
1510 Longworth HOB
Washington, DC 20515
Phone: 202-225-1790
Fax: 202-225-5517

Congressman Edolphus Towns
U.S House of Representatives
2232 Rayburn HOB
Washington, DC 20515
Phone: 202-225-5936
Fax: 202-225-6018

Congressman G. K. Butterfield
U.S House of Representatives
413 Cannon HOB
Washington, DC 20515
Phone: 202-225-3101
Fax: 202-225-2256

Congressman Gregory Meeks
U.S House of Representatives
1710 Longworth HOB
Washington, DC 20515
Phone: 202-225-3461
Fax: 202-225-4169

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Congressman Jesse Jackson Jr.
U.S House of Representatives
2419 Rayburn HOB
Washington, DC 20515
Phone: 202-225-0779
Fax: 202-225-0899

Congressman Keith Ellison
U.S House of Representatives
1130 Longworth HOB
Washington, DC 20515
Phone: 202-225-4755
Fax: 202-225-4886

Congressman Kendrick Meek
U.S House of Representatives
1039 Longworth HOB
Washington, DC 20515
Phone: 202-225-4506
Fax: 202-225-0777

Congresswoman Maxine Waters
U.S House of Representatives
2324 Rayburn HOB
Washington, DC 20515
Phone: 202-225-2201
Fax: 202-225-7854

Congressman Melvin Watt
U.S House of Representatives
2236 Rayburn HOB
Washington, DC 20515
Phone: 202-225-1510
Fax: 202-225-1512

Congresswoman Barbara Lee
U.S House of Representatives
2444 Rayburn HOB
Washington, DC 20515
Phone: 202-225-2661
Fax: 202-225-9817

Congresswoman Caroline Cheeks Kilpatrick
U.S House of Representatives
1610 Longworth HOB
Washington, DC 20515
Phone: 202-225-2261
Fax: 202-225-5730

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Congresswoman Corrine Brown
 U.S House of Representatives
 2444 Rayburn HOB
 Washington, DC 20515
Phone: 202-225-0123
Fax: 202-225-2256

Congresswoman Eddie Bernice Johnson
 U.S House of Representatives
 1511 Longworth HOB
 Washington, DC 20515
Phone: 202-225-8885
Fax: 202-2256-1477

Congresswoman Sheila Jackson Lee
 U.S House of Representatives
 410 Canon HOB
 Washington, DC 20515
Phone: 202-225-3816
Fax: 202-225-3317

Congresswoman Yvette Clarke
 U.S House of Representatives
 1029 Longworth HOB
 Washington, DC 20515
Phone: 202-225-6231
Fax: 202-2256-0112

Congressman Danny Davis
 U.S House of Representatives
 1222 Longworth HOB
 Washington, DC 20515
Phone: 202-225-5006
Fax: 202-225-5641

Congresswoman Stephanie Tubbs-Jones
 U.S House of Representatives
 1516 Longworth HOB
 Washington, DC 20515
Phone: 202-225-7032
Fax: 202-2256-1539/2367

Congressman Bennie Thompson
 US House of Representatives
 2432 Rayburn HOB
 Washington, DC 20515
Phone: 202-225-5876
Fax: 202-225-5898

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Working Copy

13th Annual Caribbean Multi-National
Business Conference Program
St. Maarten, N.A.

**THEME: A REGION IN TRANSITION -- STRATEGY FOR
CHANGE -- BUILDING ALLIANCES**

Thursday, November 6, 2008

12:00 noon - 6:00pm : CONFERENCE REGISTRATION -

5:00 - 6:30 **TOWN HALL FORUM - HEALTH**
Healthy Eating and Living
Innovative Solutions for Life styles
Diseases- a Collaborative Approach - Diabetes,
Hypertension, Obesity, Oral Health

Venue **ROYAL ISLANDER**

Moderator **Dr. Marcia Bayne Smith**

Speakers **Mrs. Karen Boykin-Towns**
Congressmember Dr. Donna Christian Christensen
Commissioner Maria Buncamper Molanus, Health
Commissioner, St. Maarten
Dr. Leon Merrick
Dr. Jay Cohan
Dr. John Palmer

6:30- 7:30pm **OPENING RECEPTION**

Venue: **UPPER POOL.**

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Theme: *A REGION IN TRANSITION -*
Speakers: *Faye A. Rodney*
Hon. Roy Marlin - Commissioner for Tourism & Finance - St
Maarten.

MC: *Sabrina Hosang - Royal Caribbean Bakery*
7:30 - 9:30 pm *OPENING DINNER.*

Venue: *MAHO ROOM*

Theme: *STRATEGY FOR CHANGE*
MC *Judge Sylvia Hinds-Radix*
Speakers: *Susan Taylor*
Hon. Donald Payne, Member US Congress

10:00pm - 1:00am: *HOSPITALITY AREA*

Friday, November 7, 2008

8:00am - 8:45am *(BREAKFAST) - OCEAN TERRACE*

9:00am - 6:00pm	CONFERENCE REGISTRATION OCEAN TERRACE LOBBY CONFERENCE SECRETARIAT SABA ROOM
-----------------	---

9:00am - 10:15am **OPENING CEREMONIES**

Venue: **MAHO ROOM**

Theme: **BUILDING ALLIANCES FOR PROGRESS**

Invocation: **Rev. Susan Johnson-Cook**

Anthems: **St. Maarten**
Lift Every Voice

Remarks: **Eric Eve**
Karen Boykin-Towns
Marie Long
Ed Goldberg
Patrick Gaston
Hazel Dukes

Speakers: **Hon. Carolyn Cheeks Kilpatrick - Member**
US Congress
Commissioner Sarah Wescot-Williams, Leader
of Government, St. Maarten
Harry Belafonte

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RIBBON CUTTING CEREMONIES

10:15am - 10:30am COFFEE BREAK -

10:30am - 11:45am PRESENTATION

EDUCATION -- TECHNOLOGICAL ADVANCES - COLLABORATION

Moderator Dr. Emmannel Gonsalves
Greetings Marie Long
Speakers Dr. Edison Jackson
Patrick Gaston
Dr. Marcia Keiza
Congressmember Eddie Bernice Johnson
Professor Rex Nettleford

12:00 noon - 1:15p.m. PRESENTATION

TRAVEL AND TOURISM -

A Transformative Approach

Moderator Lloyd Williams
Greetings Wallace Ford
Speakers Commissioner Roy Marlin
Howard Dodson
Congressman Gregory Meeks
Professor Rex Nettleford
Dr. Martin Valdes

12:00 noon - 1:15p.m - PRESENTATION
**HEALTH - AN ECONOMIC DEVELOPMENT
STRATEGY FOR THE REGION**

Greetings Karen Boykin-Townis

Moderator Yvonne Graham
Speakers Dr. Denzil Douglas
Dr. Carl Kenel Pierre
Commissioner Maria Buncamper Molanus, Health
Commissioner, St. Maarten
Dr. Dexter McKenzie

1:30pm - 2:30pm LUNCHEON
Venue: Main Ballroom
Theme: **BUILDING A WINNING STRATEGY - PARTNERSHIPS
THAT WORK**

Moderator: Hon. Nick Perry, NYS Assembly
Speakers Eric Ivo

Keynote Speaker Hon. David Paterson, Governor New York State

3:00pm - 4:00pm
Round Table # 1
Theme **EDUCATION - THINKFINITY PRESENTATION &
DEMONSTRATION**

Venue **Royal Islander A**
 MC **Dr. Patricia Hazlewood**
 Speakers **Patrick Gaston**
Albert Browne

Round Table #2 --

Theme **LOCAL BUSINESS INITIATIVES**
Opportunities with US Companies

Venue **Royal Islander B**
 Speakers: **Ed Goldberg**
Eric Ebe
Albert Browne

4:30pm - 6:00pm

TOWN HALL FORUM - EDUCATION

Venue **Royal Islander A**
 Theme **EDUCATION -- SHARING WORKING SOLUTIONS**
 Greetings **Michael Flanigan**
 Moderator **Dr. Marcella Maxwell**

Speakers: **Hon. David M. Dinkins - Former Mayor, NYC**
Dr. Edison O. Jackson
Dr. Marcia Keizs
Professor Rex Nettleford, UWI
William Payne, Assemblyman New Jersey

Venue:
6:30:00pm - 7:30pm *HOST COUNTRY EVENING*

Venue:

Theme

MC:

Speakers:

7:30 - 8:00 pm:

8:00pm - 10:30 pm.

CULTURAL PRESENTATION

Venue :

Theme

10:00pm - 11:00am *HOSPITALITY AREA*

Venue:

Saturday, November 8, 2008

7:45 am - 8:15 am *BREAKFAST*

Venue *OCEAN TERRACE*

8:30am - 10:00am *PRESENTATION*

Theme *WOMEN OF INFLUENCE AND POWER*

Venue: *MAHO BEACH*

Greetings & Opening Remarks -	Brenda Scott
Moderator	Marilyn Johnson
Speakers:	Commissioner Sarah Wescot-Williams, Leader of Government Business Dame Billie Miller, former Deputy Prime Minister, of Barbados Dr. Marcia Keizs, President York College Michelle Paterson, First Lady New York State Congresswoman Eddie Betnice Johnson Rev. Dr. Susan Johnson-Cook
10:15am - 11:45am	PRESENTATION
Theme	THE CARIBBEAN, IT'S VALUE & POTENTIAL
Venue	Royal Islander A
Greetings	Wallace Ford
Moderator	Dame Billie Miller
Speakers	Hon. P. J. Patterson, former Prime Minister, Jamaica Hon. Dr. Ralph Gonsalves, Prime Minister St. Vincent and the Grenadines Hon. Dr. Denzell Douglas, Prime Minister, St. Kitts-Nevis Congressman Charles Rangel
12:00 noon - 1:30 p.m.	PRIVATE MEETING -- CLOSED DOOR SESSION with Members of Congress and Ministers of Government

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12:00 noon - 1:15p.m. **PRESENTATION**

Theme *TRADE & INVESTMENT - CREATIVE SOLUTIONS*
RETOOLING FOR GROWTH - PARTNERSHIP AT WORK

Venue Royal Islander A

Greetings Michael Flanigan

Moderator Ivanhoe Friend

Speakers Adolfo Carrion, Borough President, Bronx, New York
Compton Bourne, President Caribbean Development Bank
Congressman Edolphus Towns
Eric Eve

12:00 noon - 1:15pm **PRESENTATION**

Theme *Hemispheric Security - Ports/Airports -*
Crime - Drugs - Disaster

Venue Royal Islander B

Greetings Karl Brown, Deputy Borough President, Bronx
Judge Sylvia Ash

Moderator Tony Best

Speakers Congressman Bennie Thompson
Commissioner Theo Heyliger, St. Maarten
Professor Ivelaw Griffith
Hon. Lance Oglste, Brooklyn District Attorney

1:30pm - 2:30 pm **LUNCHEON**

Venue MAHO ROOM

Theme: **CARIBBEAN -- A SOLID INVESTMENT**

Greetings **Hon. Darryl Towns**

Speakers **Hon. William Thompson, NYC Comptroller**
Dr. Compton Bourne, President CDB

Round Table #1 **IMMIGRATION/DEPORTEES**

Venue **Royal Islander A**

Moderator **Dr. Marco Mason**

Speakers **Congressman Bennie Thompson**
Hon. Eddie Bernice Johnson, Member US Congress
Attorney Stanford Rubenstein
NYC Councilmember Dr. Kendall Stewart

Round Table#2: **HAITI -- BOLD INITIATIVES -- THE DIASPORA--**
CBC AND CARICOM

Venue **Royal Islander B**

Moderator **Hon. Yvonne Graham**

Speakers **Hon. Charles Rangel**
Hon. Gregory Meeks
Hon. Ralph Gonsalves
Dr. Lesly Kernisant

4:30 pm -- 6:00pm **TOWN HALL FORUM - TECHNOLOGY**

Venue: **Royal Islander A**

Greetings & Opening - Marie Long

Moderator Colin Ward

Speakers Congressman Edolphus Towns
Albert Brown
Commissioner of Technology

6:30 - 7:30pm GALA RECEPTION

Speakers Susan Taylor

7:30pm - 10:00pm - GALA DINNER & AWARDS PRESENTATION

Speaker - Dr. Harry Belafonte

Hon. Sarah Wescot-Williams, Leader of Government
Business

AWARDS PRESENTATION

ENTERTAINMENT

10:30pm - 1:00am - HOSPITALITY AREA

Venue: HOTEL CONFERENCE ROOM

Sunday, November 9, 2008

8:30 am - 10:00am POWER BREAKFAST

842

Theme: *SPIRITUALITY - THE BASICS IN BUSINESS*
Greetings: *Lowell Hawthorne*
Speakers: *Ed Goldberg*
Selection: *Local Choir*

October 13, 2008

12

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Exhibit 24



**Office of
Congresswoman Carolyn Cheeks Kilpatrick**

Date: 11/05/2008Cover sheet plus 5 pagesTo: CCK Office: _____

Fax Number: _____ Telephone Number: _____

Re: _____

 Urgent For Review Please Comment Please Reply
Comments: Flight Info.

From:

 Congresswoman Carolyn Cheeks Kilpatrick

<input type="checkbox"/> Duron Marshall	District Director
<input type="checkbox"/> Andrea Bragg	Executive Assistant
<input type="checkbox"/> Lynn Bell	Congressional Assistant
<input type="checkbox"/> Tracy Walker	Communication Director
<input type="checkbox"/> Rodney Johnson	District Coordinator
<input type="checkbox"/> Robert Clouston	District Coordinator
<input type="checkbox"/> James Slaughter	District Coordinator
<input type="checkbox"/> John Harris	District Coordinator
<input type="checkbox"/> Melissa Brown	District Coordinator

 Washington

2264 Rayburn HOB
Washington, DC 20515
Tel: 202-225-2261
Fax: 202-225-5730

 Detroit

1274 Library, Suite 1B
Detroit, MI 48226
Tel: 313-965-9004
Fax: 313-965-9006

 Wyandotte

3005 Biddle Street, Room A
Wyandotte, MI 48192
Tel: 734-246-0780
Fax: 734-246-1148

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If you have a U.S. DOMESTIC E-TICKET, check in for your flight using Flight Check-In at AA.com between 1 and 24 hours prior to flight time. Use the E-TICKET confirmation/record locator above to select or change your seat and obtain a boarding pass. On day of departure, you will be required to present a government-issued photo-ID at the airport.

As a security measure, if this ticket was purchased using a credit card with billing address in Latin America or the Caribbean (except Puerto Rico and U.S. Virgin Islands), the credit card holder must be present at time of check-in to verify identification and sign a credit card voucher. For your convenience, the credit card holder can present the credit card and provide this signature prior to departure date at any AA ticketing office in Latin America and the Caribbean.

See the ENDORSEMENT line below for key fare rules pertaining to your ticket, if applicable.

If you have begun travel, your online receipt record may only indicate portions of your trip which have not been flown.

Itinerary

Date:	06Nov - Thursday			
Flight:	AMERICAN AIRLINES	873	Boeing 737-800 Passenger (738)	Booking Code: V
Departure:	DTW Detroit	06:00 AM		3HR 5MIN
Arrival:	MIA Miami	09:05 AM		
	KILPATRICK, CAROLYN SEAT 13D	Economy	FF# :AA A833U50	
Date:	06Nov - Thursday			
Flight:	AMERICAN AIRLINES	687	Boeing 737-800 Passenger (738)	Booking Code: V
Departure:	MIA Miami	11:20 AM		2HR 50MIN
Arrival:	SXM St Maarten	03:10 PM		
	KILPATRICK, CAROLYN SEAT 8C	Economy	FF# :AA A833U50	
Date:	09Nov - Sunday			
Flight:	AMERICAN AIRLINES	2160	Boeing 737-800 Passenger (738)	Booking Code: Q
Departure:	SXM St Maarten	04:15 PM		3HR 20MIN
Arrival:	MIA Miami	08:35 PM		
	KILPATRICK, CAROLYN SEAT 14C	Economy	FF# :AA A833U50	
Date:	09Nov - Sunday			

09-2567 0272

Flight:	AMERICAN AIRLINES	390	Boeing 737-800 Passenger (738)	Booking Code: Q
Departure:	MIA Miami	08:25 PM		3HR 5MIN
Arrival:	DTW Detroit	11:30 PM		
	KILPATRICK, CAROLYN SEAT 13C	Economy	FF#:AA A833J50	

Receipt

PASSENGER	TICKET NUMBER	FARE	TAXES	TICKET TOTAL
KILPATRICK,CAROLYN	0012190117150	548.80 USD	77.35	626.15
Payment Type:	AMERICAN EXPRESS *****9426			Total 626.15 USD

Endorsements/Restrictions -

NONREF/CHG FEE APPLIES/NO VALUE AFTER FLT TIME

Note - If your ticket involves travel outside the U.S., Canada, U.S. Virgin Islands or Puerto Rico and has been reissued for any reason, the total amount above may not include all taxes. Please check with American Airlines Reservations at 1-800-433-7300 for the correct total.

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Check in for your flight using Flight Check-In (www.aa.com/checkin) at AA.com between 1 and 24 hours prior to flight time if you have a U.S. domestic e-ticket. You may also use the Self Service Check-In machine (www.aa.com/selfservice) at the airport on your day of departure. Use the e-ticket confirmation/record locator above to select or change your seat and obtain a boarding pass.

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If you are traveling internationally, please ensure that you have all necessary travel documents for the countries you are visiting. Visit the International Travel section at www.aa.com/intl for more information and helpful links.

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If you need special assistance due to a disability, or have children or pets traveling, visit the Special Assistance section www.aa.com/assistance before you travel.

FLIGHT STATUS

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Please check your departure/arrival gate information prior to arriving at the airport. This information can be found at www.aa.com/gates.

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Should you need to change your reservation, please call 1-800-433-7300 and refer to the above record locator.

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Thirteenth Annual Caribbean Mult Business Conference Registration Form - PI

SAINT MAARTEN . NOVEMBER €

Before you begin your application, you may want to gather your supplementary documentation so that you have it ha complete all sections of the application form except for, in some cases, section 4 ('Transportation'). After you have e within 24 hours. For more information please contact NY Carib News at 212-944-1991.

Step One - Applicant Profile

Please provide the following contact information.

*Last Name: Kilpatrick

*First Name: Carolyn

*E-mail Address: cckilpatrick@mail.house.gov

Home Phone: (313) 361-3662

Business Name: U.S. House of Representatives

Business Phone: (202) 225-2261

Business Address: 2264 Rayburn HOB

Business Address (co

Type of Business: Government

Area of Interest:

Step Two Part A - Accommodation (Standard Rooms) Choose Either Standard or Suite

Please choose an accommodation package, if you choose the double occupancy option, we ask that you provide the name of Beach Hotel. Please use this opportunity to make any special requests such as extra nights.

Extra Night Rate For Standard Rooms - \$180 per night based on Double Occupancy and \$265 per night based on provided packages, please contact us directly.

Single Occupancy Packages Standard Accommodation - Single

Rooming with...

Double Occupancy Standard Accommodation - Double

Sports: Golf Golf Shirt Size : Small

Step Two Part B - Accommodation (Suite Rooms - Limited Availability) Choose Either Standard or Suite

Please choose an accommodation package, if you choose the double occupancy option, we ask that you provide the name of Beach Hotel. Please use this opportunity to make any special requests such as extra nights.

Extra Night Rate For Suite Rooms - \$250 per night based on Double Occupancy and \$325 per night based on SI packages, please contact us directly.

Single Occupancy Packages Conference Package Suite - \$1198

Rooming with...

Double Occupancy Suite Accommodation - Double

Sports: Golf Golf Shirt Size : Small

Step Three - Transportation

In order for us to arrange your ground transportation, it's required that we have your flight information.

Airline:

Flight Number:

09-2567 0275

American Airlines
Departure Date:
November 6 2008
Return Airline:
American
Return Date:
November 6 2008

873
Departure Time:
6:00AM
Return Flight Number:
2160
Return Departure Time:
4:15PM

STEP 4: PAYMENT

Please enter your credit card information, then click on 'Submit Registration' to complete your online registration, wait a fee check, print this page and mail to NY Carib News with your check enclosed.

Form of Payment:
Credit Card
*Credit Card Number:

*Name on Card:
*Expiration Date (mm)

After you complete the Registration form, please double check your information. If you have any questions, please call us

Submit

Thank You Page

Page 1 of 2

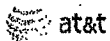
THANK YOU FOR FILLING OUT THE REGISTRATION FORM. This page verifies that your information has been sent to Carib News Conference. One of our planners will contact you by email or phone within a couple of days to answer any questions you may have.

Thank You In Advance

09-2567 0277

From: Andrea Bragg

Page 1 of 1



[Print] [Close]

From: "Bragg, Andrea" <Andrea.Bragg@mail.house.gov>
 To: <carib-desk@att.net>
 Subject: FW: Room Information
 Date: Friday, October 31, 2008 12:14:51 PM

Patricia, Ayanna Kilpatrick will be staying with Congresswoman Kilpatrick along with Annaya Ferguson (7-months-old). Please add a crib to the room. The travel dates are Thursday, November 6 thru Sunday, November 9. Thank you.

Andrea Bragg
 Executive Assistant/Scheduler
 for Congresswoman Carolyn Kilpatrick
 1274 Library Suite 1B
 Detroit, Michigan 48226
 (313) 966-8004 (office)
 (313) 966-8008 (fax)

From: Bragg, Andrea
 Sent: Friday, October 31, 2008 12:10 PM
 To: 'caribbean-desk@att.net'
 Subject: Room Information

Patricia, Ayanna Kilpatrick will be staying with Congresswoman Kilpatrick along with Annaya Ferguson (7-months-old). Please add a crib to the room. The travel dates are Thursday, November 6 thru Sunday, November 9. Thank you.

Andrea Bragg
 Executive Assistant/Scheduler
 for Congresswoman Carolyn Kilpatrick
 1274 Library Suite 1B
 Detroit, Michigan 48226
 (313) 966-8004 (office)
 (313) 966-8008 (fax)

<http://webmail.att.net/wmc/en-US/n/wm/490B4995000D794300005A2A22230706129B0...> 10/31/2008

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Exhibit 25



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of the
General CounselOffice of the
Secretary
Washington, D.C.
20201

June 2, 2000

MEMORANDUM

TO: Deputy Ethics Counselors
National Institutes of Health

FROM: Karen Santoro
Ethics Counsel

SUBJECT: Outside Activities of NIH Employees with Foundations

Recently, a provision of the Internal Revenue Code has been brought to my attention that has serious ramifications for NIH employees who have previously received approval to engage in outside employment activities with private foundations. The statute imposes a tax on "each act of self-dealing between a disqualified person and a private foundation." 26 U.S.C. § 4941(a)(1). This statute, which was enacted in 1969, was intended to curb private foundations' attempts to influence Government officials. The Internal Revenue Service has issued a number of revenue rulings with respect to Government employees and prospective activities with private foundations.

Issue: The Internal Revenue Service imposes an individual penalty tax of up to 200% of the amount of compensation from a private foundation to certain Government officials conducting outside activities with these foundations.

Conclusion: Certain Government officials should refrain from accepting compensation (other than travel expenses within the United States) for outside activities with private foundations.

Discussion: Specifically, the statute imposes a tax on each act of self-dealing by a disqualified individual equal to five percent of the amount involved for each year in the taxable period. 26 U.S.C. § 4941(a)(1) [1]. In any case in which an initial tax is imposed on an act of self-dealing which is not corrected within the taxable period, a tax equal to 200 percent of the amount involved will be imposed on the disqualified person. 26 U.S.C. § 4941(b)(1)[2].

The Code defines "self-dealing" as any direct or indirect agreement by a private foundation to make any payment to certain enumerated government officials. 26 U.S.C. § 4941(d)(1)(F)[3]. Government officials who are "disqualified persons" within the scope of this restriction are elective officials, Presidential appointees, Schedule C employees, and individuals compensated at or above GS-15-7 levels, irrespective of their appointment mechanism (Title 42, SBR5, Commissioned Corps), and personal or executive assistants or secretaries to any of the foregoing. 26 U.S.C. § 4941(c). Excluded from the definition of government employees is a "special governmental employee" as defined in 18 U.S.C. § 202 (a)[4]; Treas. Reg. § 3.4941-1(g)(1).

Also excluded from the definition of self-dealing are agreements to employ an individual for any period after the termination of his government service if that individual is terminating his government service within a 90 day period. 26 U.S.C. § 4941 (d)(1)(F). For purposes of the statute, a "private foundation" has the same meaning as in 26 U.S.C. § 609. A website for obtaining the status of a foundation can be found at http://www.irs.us/treas.gov/bus_info/eo/eoearch.html.

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Government officials who are within the scope of this statute will be required to pay the tax only if the individual participates in the act of self-dealing knowing that it is an act of self-dealing. 26 U.S.C. § 4941 (a)(1). The regulations define "knowing" to include those situations when: the individual has actual knowledge of the facts that such a transaction would be self-dealing; he is aware that the act violates Federal tax law governing self-dealing; and he negligently fails to make reasonable attempts to ascertain whether the act is an act of self-dealing or he is in fact aware that it is in an act of self-dealing. Treas. Reg. § 53.4941 (a)(1)-(b)(3). The burden is thus on the individual to determine whether he or she is liable under the statute.

An individual's participation in an act of self-dealing will not be considered "knowing" if the individual, after full disclosure of the factual situation to legal counsel, relies on the advice of counsel expressed in a "reasoned written legal opinion" that an act is not an act of self-dealing within the meaning of the statute, even if the act is subsequently determined to be self-dealing. Treas. Reg. § 53.4941(a)(1)-(b)(6).

Finally, a tax for self-dealing will not be imposed under the following circumstances: certain nontaxable prizes and awards if the recipients are selected from the general public; nontaxable scholarships and fellowship grants; qualifying annuity plans; contributions or gifts not exceeding an aggregate of \$25; payments made under the government employee training program in 5 U.S.C. Ch. 41; and payment of travel expenses within the United States. 26 U.S.C. § 4941 (d)(2)(B); Rev. Rul. 131, 1974-2 C.B. 385.

As a result of this statute, NIH employees paid at or above the GS 15-7 level are effectively prohibited from receiving compensation from a private foundation for activities such as teaching, writing, advising, or consulting. The Internal Revenue Service may serve a deficiency notice upon an employee, who would then be forced to pay the tax or contest the assessment.

Effective immediately, all requests for approval of outside activities must be reviewed in accordance with the statutory provision at 26 U.S.C. § 4941. The compensation level of the individual requesting approval must be considered in conjunction with an analysis of the nature of the private entity offering the opportunity for compensation. Previously approved outside activities with foundations for NIH employees who are paid at or above the GS 15-7 level should be reviewed to determine the status of the foundation. Should the status of the foundation be private, any affected employee must be advised to either accept only travel expenses within the United States for his/her service or resign from such service. Employees who have questions whether payment to them by a private foundation constitutes acts of self-dealing should consult private counsel.

For your information, the Foundation for the National Institutes of Health (FNIH) and the Foundation for Advanced Education in the Sciences (FAES) are for your information, the Foundation for the National Institutes of Health (FNIH) and the Foundation for Advanced Education in the Sciences (FAES) are not considered private foundations for purposes of this prohibition.

The NIH Office of the Legal Advisor has reviewed and concurs in this opinion.

cc: Robert Lanman, Stephen Benowitz

[1] When a tax is imposed on a self-dealer, a corresponding tax of 2.5 percent is imposed on any foundation manager unless the participation by the foundation manager is not willful and is due to reasonable care. 26 U.S.C. § 4941(a)(2). A maximum tax of \$10,000 may be imposed. 26 U.S.C. § 4941 (c) (2).

[2] The "taxable period" is defined as the period beginning with the date on which the act of self-dealing occurs, and ending on the earliest of: the date that a deficiency notice is mailed by the I.R.S.; the date on which the tax is assessed; or the date on which the correction of the act of self-dealing is completed. 26 U.S.C. § 4941 (a), Treas. Reg. § 53.4941 (a) -1 (a) (1). As with the initial tax, a corresponding additional tax of 50 percent will be imposed on any foundation manager who refuses to agree to the correction. 26 U.S.C. § 4941 (b) (2). As with the initial tax, the penalty on a foundation manager is limited to \$10,000. 26 U.S.C. § 4941 (c) (2).

[3] The statute also defines "self-dealing" to include: the sale or exchange, or leasing, of property; the lending of money or other extension of credit; the furnishing of goods, services, or facilities; payments to a disqualified person as defined in 26 U.S.C. § 4946 (a) (such as substantial contributors, foundation managers, holders of 20 percent of the voting power or beneficial interests; family members of disqualified individuals, or a corporation, partnership, or trust holding a 35 percent interest); and transfer to or use by a disqualified person of the foundation's income or assets. 26 U.S.C. § 4941 (d).

[4] 18 U.S.C. § 202 (a) defines "special Government employee" as temporary employee appointed for a term not to exceed 130 days, a part-time U.S. commissioner or magistrate, a part-time member of Congress, or a Reserve or National Guard officer.

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SANDLER, REIFF & YOUNG, P.C.

October 20, 2009

R. Blake Chisam, Esq.
Chief Counsel & Staff Director
Committee on Standards of Official Conduct
Suite HT-2, The Capitol
Washington, D.C. 20515

RECEIVED
2009 OCT 20 PM 5:09
COMMITTEE ON STANDARDS OF OFFICIAL CONDUCT

Dear Mr. Chisam:

In response to the Committee's letter of October 5, 2009, addressed to our client, U.S. Rep. Carolyn C. Kilpatrick, enclosed is a Statement of Congresswoman Kilpatrick in response to the Report of the Office of Congressional Ethics ("OCE") relating to allegations concerning the Congresswoman's participation in the 13th Annual Caribbean Multi-National Business Conference held in St. Maarten, N.A. from November 6-9, 2008.

As the Statement makes clear, there is simply no basis whatsoever for OCE's findings that there is a "substantial reason to believe" that the Congresswoman violated any of the House Rules or the Committee regulations.

Your letter of October 5 further states that, "Pursuant to Committee Rule 17(A)(e), OCE's report and findings will be released to the public at the conclusion of the Committee's investigation." The Congresswoman respectfully submits, however, that the Committee is not authorized to release the OCE Report, under Rule 17(A), for three reasons.

First, the OCE Report was not properly completed or issued under H. Res. 895, 110th Congress, 2d Sess. (2008). The Board repeatedly failed to comply with the deadlines established by that Resolution. The Resolution provides that, once a preliminary review is commenced, it must be completed within 30 days of the date a request for review is received, and if the Board decides to commence a second-phase review, the Board must vote to do so "[b]efore the end of the applicable time period," *i.e.*, before the end of that 30-day period. H. Res. 895, sections 1(e)(1)(B) & (C).

In this case, the written request was received on February 23, 2009. (OCE Report p. 6 ¶10). The 30-day period expired on March 25, 2009. The Board, however, did not vote to commence a second-phase review until March 27, 2009. (OCE Report p. 6 ¶11).

The Resolution required that second-phase review to be completed within 45 days, unless the Board voted to extend the period by an additional 14 days. H. Res. 895, section



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October 20, 2009
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1(c)(2)(A). The Board did vote to extend that period by 14 days and, therefore, the period in which to complete a second-phase review expired on May 25, 2009. Yet the Board did not vote to transmit its Report to this Committee until May 29, 2009. (OCE Report p. 6 ¶13). Further, the Board actually continued its investigation after the date on which it represented, to this Committee, that the Board had completed its second-phase review. Specifically, the Board reported to this Committee that its second-phase review ended on May 26, 2009 (OCE Report p. 6 ¶12). In fact OCE conducted interviews in the course of that investigation as late as May 27 and May 28, 2009. (OCE Report p. 42 note 87).

Second, substantial portions of the OCE Report contain information that is highly inflammatory yet which does not relate in any way to Congresswoman Kilpatrick and in fact was compiled in flagrant violation of H. Res. 895. Specifically, as the Congresswoman's Statement explains, the OCE Report, which is supposed to relate solely to the Congresswoman's conduct, also includes a very substantial discussion that has nothing whatsoever to do with the Congresswoman or her attendance at the Carib News Conference. Fully half of the OCE Report (Section III, pages 23 through 44) is devoted to an extensive review of allegations about the supposed "intervention" of the former Counsel to the Chair of the Committee in the Committee's review of the 2007 Carib News Conference.

Congresswoman Kilpatrick did not attend that 2007 Conference at all and was completely unaware of any of the events described relating to this supposed "intervention." Indeed, OCE concedes that the "intervention of the counsel to the former Chair...*did not involve Congresswoman Kilpatrick.*" (OCE Report p. 5 ¶8(b)(emphasis added). It is wholly inappropriate to release a report purportedly evaluating allegations against Congresswoman Kilpatrick, but fully half of which is devoted to derogatory information about another Member (now deceased) and her staffer, having nothing whatsoever to do with Congresswoman Kilpatrick.

Further, the investigation of the conduct of Committee staff taking place entirely within 2007 manifestly violates H. Res. 895, which clearly provides that "No review shall be undertaken by the board of any alleged violation of law, rule... not in effect at the time of the alleged violation; *nor shall any review be undertaken by the board of any alleged violation that occurred before the date of adoption of this resolution.*" H. Res. 895, section 1(e)(emphasis added). The Resolution was adopted on March 11, 2008. The Board had no authority whatsoever to investigate conduct taking place entirely in 2007.

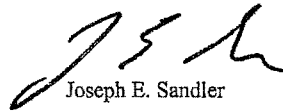
Third, release of the OCA Report is not required by Rule 17A(e) of this Committee's Rules. That Rule provides that, if this Committee votes to dismiss a matter referred from the Board "the Committee is not required to make public the written report and findings of the Board...unless the Committee's vote is inconsistent with the recommendation of the Board." In this case, for the first reason stated above, there is no valid recommendation of the Board because the Board's recommendation was issued in violation of the Resolution. Further, the Board's recommendation was simply that "the Committee... further review the above described allegations concerning Congresswoman Kilpatrick." (OCE Report p. 1). There would be nothing inconsistent with that recommendation in a vote by this Committee to dismiss the matter.

R. Blake Chisam, Esq.
October 20, 2009
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For these reasons, the OCE Report should be disregarded by this Committee in its entirety and should, in no event, be released.

The Congresswoman is grateful to the Committee for the opportunity afforded to the Congresswoman to respond to the OCE Report. If you have any questions or need any further information concerning the above or the Congresswoman's Statement, please do not hesitate to contact me.

Sincerely yours,



Joseph E. Sandler

**BEFORE THE
U.S. HOUSE OF REPRESENTATIVES
COMMITTEE ON STANDARDS OF OFFICIAL CONDUCT**

**STATEMENT OF U.S. REPRESENTATIVE CAROLYN C. KILPATRICK
IN RESPONSE TO REPORT OF
OFFICE OF CONGRESSIONAL ETHICS IN
REVIEW NO. 09-2567**

I am submitting this Statement at the invitation of the Committee on Standards of Official Conduct (the "Committee" or "House Ethics Committee"), by letter to me dated October 5, 2009, to respond to the Report of the Office of Congressional Ethics in Review No. 09-2567 (the "OCE Report"). That OCE Report addresses my acceptance of expenses from the Carib New Foundation to attend the 13th Annual Caribbean Multi-National Business Conference held in St. Maarten, N.A., from November 6-9, 2008 (the "Carib News Conference)."

For reasons stated in the accompanying letter from my counsel, the OCE Report should not be released at all. If that Report nevertheless is released, I respectfully request that this entire Statement be released to the public as well.

The OCE Report found "substantial reason to believe" that I violated "various provisions" of House Rule XXV, Section 5(b) in three ways: (1) by accepting reimbursement of expenses from entities that employ or retain lobbyists for participating in an event for more than one day; (2) by under-reporting the value of travel reimbursements received; and (3) by violating the "limitation that a Member may bring only one family member with them on privately sponsored travel." OCE Report, p. 4.

As explained below in more detail, OCE's findings on these three points are absolutely baseless. Those findings grossly misconstrue House Rules and House Ethics Committee procedures and ignore the evidence presented to OCE. The undisputed facts are that:

- In accepting travel expenses for this trip, I followed to the letter the procedures set out in House Rule XXV and the regulations of the Committee.
- I received written pre-approval from this Committee for reimbursement of these travel expenses.
- I accurately reported all information about the expenses reimbursed as provided to my office by the trip's sponsor, Carib News.

- No expenses of any kind were accepted for the travel expenses of any family member except the one family member, my sister, reimbursement of whose expenses was specifically approved by this Committee.

For these reasons, this Committee should reject the OCE Report's findings in their entirety and give them no consideration at all.

Further, the OCE Report, which is supposed to relate solely to my conduct, also includes a very substantial discussion that has nothing whatsoever to do with me or my attendance at the Conference. Fully half of the OCE Report (Section III) is devoted to an extensive review of allegations about the supposed "intervention" of the former Counsel to the Chair of the Committee, the late Rep. Stephanie Tubbs Jones (D-Ohio), in the Committee's review of the 2007 Carib News Conference, I did not attend the 2007 Conference at all and was completely unaware of any of the events described relating to this supposed "intervention." Indeed, OCE concedes that the "intervention of the counsel to the former Chair...*did not involve Congresswoman Kilpatrick.*" OCE Report p. 5 ¶8(b). Why then did OCE devote half of its report and hundreds of pages of exhibits to these allegations that have nothing to do with me? Inclusion of the material in this Report is wholly inappropriate.

The OCE Report also addresses limitations on the Carib News Foundation's ability to pay for overseas travel of government officials under the Internal Revenue Code. The OCE Report concludes that I told OCE that I was "unaware of any such limitations" and that, "The Board finds this statement to be credible." OCE Report p. 6 ¶8(d). No reason to question my conduct in any way, relating to this point, is set out in the OCE Report and therefore I do not address it further.

I. Identifying the Sponsor of the Trip

As the OCE Report concedes, I properly submitted a Privately Sponsored Travel: Traveler Form, to the House Ethics Committee, with respect to the acceptance of expenses for this trip from a private source. OCE Report, p. 9 ¶20. Attached to that form was a Private Sponsor Travel Certification Form provided to my office by the trip sponsor, Carib News, which certified that Carib News was the sole sponsor of the trip and that Carib News had "not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip." OCE Report Exhibit 1 at p. 0012. This Committee then approved payment of my travel expenses by Carib News Foundation, in a letter to me dated October 21, 2008. OCE Report p. 10 ¶23 & Exhibit 1 p. 0007.

The OCE Report finds no problem or fault whatsoever in the process I followed in obtaining the required pre-approval by this Committee of payment of the expenses for this trip. The Report charges, however, that “once at the conference, Congresswoman Kilpatrick was presented with evidence that other corporations were sponsors.” OCE Report p. 7 ¶16. That charge is based solely on the facts that (i) there were signs hung behind the speaker’s podium at the conference displaying the logos of several corporations and (ii) during my remarks at the Conference on November 7, 2008, in passing I stated: “and to the sponsors, by the way, all of you, we couldn’t do this, be with you, help Karl if you were’ here with us so we say thank you....” OCE Report p. 11 ¶¶24, 27-28 & Exhibit 3 p. 0053.

I will reiterate here what I told OCE and told the Investigative Subcommittee of this Committee during its interview of me: Carib News represented to this Committee, and thus to the Congress, in writing, that Carib News was the *sole sponsor* of the Conference. We are all aware that making a false statement to Congress is a federal felony. I had no information at any time that any corporation had earmarked any contribution for the Conference.

That logos of corporations were displayed on a sign—without any designation of them as sponsors of the Conference—meant nothing more to me than that they were either participants (as speakers) in the Conference and/or that they had contributed generally to support the work of Carib News. (The picture of the sign on page 212 of the OCE Report shows no designation of any sponsorship). My passing remarks thanking the “sponsors” reflected nothing more than my awareness that these companies were participating and/or had contributed funds generally to support the work of Carib News Foundation.

The OCE Report cites and reviews an extensive number of documents, and OCE interviews, indicating that various corporations in fact earmarked contributions to Carib News to defray expenses of the Conference. But it is undisputed that *I never saw a single one of these documents* until the OCE Report was delivered to me by this Committee on October 5, 2009. The OCE Report does not contend otherwise. None of these documents was copied to me. I was not a party to any of the correspondence or memos cited in this Report which supposedly pertains to my conduct. Needless to say, I was not privy to any of the interviews conducted by OCE in the course of its investigation.

OCE concedes that my reliance on the Carib News Private Traveler Form certification and the House Ethics Committee review to identify the sponsor of this trip “is reasonable to a point.” OCE Report p. 5 ¶8(a). OCE nevertheless implies that I somehow had an independent responsibility to investigate the true sponsor of the trip based on “information” that “numerous corporations were identified as sponsor of the conference at the conference.” OCE Report ¶32 p.

14. OCE further contends that, having conducted such an independent investigation, I should then have identified the “true” sponsors on my Member Post-Travel Disclosure Form. OCE Report ¶¶ 16-18 pp. 7-9.

Of course, I never received any such “information.” None of the speakers cited identified any corporation as a sponsor *of the Conference*, except for a Mr. Michael Flanigan of Citibank, (OCE Report p. 11 ¶¶24-26), whose remarks I do not recall hearing at all. The signage cited in the Report did not identify any corporation as a sponsor of the Conference.

OCE is apparently suggesting that a Member, having followed the proper pre-approval procedure under the House Rule and House Ethics regulations, and having commenced a trip, must then undertake an independent investigation on her own of the true sponsorship of the event if there are any “indications” potentially inconsistent with the sponsorship certified by the trip sponsor itself—and as confirmed by the review of House Ethics. That suggestion is absurd. No Member has the capability to conduct such an investigation.

As a Member of the House, I voted for the resolution, at the beginning of the 110th Congress, amending House Rule XXV with respect to privately-sponsored travel by Members and staff. As I understood these changes—and, I am sure, as virtually all other Members understood them—the entire point of the new pre-approval procedure is to provide Members with a mechanism for identifying the source of privately-sponsored travel. The new procedure does that by having the sponsor itself provide a certification identifying any funds earmarked for the travel and by having the House Ethics Committee then review the documentation submitted and pre-approve the receipt of expenses from the private source. In other words, a fundamental purpose of this process is precisely to allow Members *to rely on it* as a means of ensuring compliance with the rules.

OCE’s approach is thus completely inconsistent with the letter, meaning and spirit of the House Rules. OCE’s findings as to my acceptance of travel expenses from Carib News should be rejected outright by this Committee.

II. The Value of Travel Reimbursements as Reported on the Post-Travel Form

The OCE Report faults me for supposedly under-reporting, on my Member Post –Travel Disclosure Form, the value of the travel expenses paid for me by Carib News. OCE Report ¶98 p. 45. OCE correctly notes that I included, on this form, the exact information provided to me by Carib News. OCE Report pp. 46, 48 ¶¶ 100, 103-104

OCE, however, contends that I should have reported the airline cost as being about \$200 more than the figure I reported based on information appearing in fine print on the airline ticket itself and on an itinerary faxed to my office. OCE Report ¶105-6, pp. 48-49. OCE further contends that I should have reported a value for my hotel room as that appearing in an online registration document rather than the figure provided by Carib News. OCE Report ¶108 p. 51.

OCE suggests that the Post-Travel Form “puts the obligation on Members, not staff, not the Standards Committee and not sponsors, to certify that the information on the form is ‘true, accurate and complete’ to the ‘best of the Member’s knowledge.’” OCE Report p. 5 ¶8(c). OCE argues that I “saw the *value* of [my] travel” and had copies “of documents that showed its true *value*” in my office files, but certified differing information. OCE Report p. 5 ¶8(c).

OCE’s position is based on a blatant misreading of the applicable rules and regulations. The Post-Travel Form itself, in item 9, “Trip Expenses” instructs Members to “*Obtain actual dollar amounts from the sponsor.*” (See OCE Report ¶103 p. 48, showing that page of the Form as I filled it out). That is an appropriate instruction because, contrary to OCE’s misimpression, the rules do *not* call for reporting of the *value* of the transportation and lodging provided, but rather for reporting the amount of actual “*expenses reimbursed.*” Rule XXV, Section 5(b)(1)(A)(ii). Rule XXV, Section 5(b)(3), specifically addressing this form, refers to “a good faith estimate of total transportation expenses reimbursed or to be reimbursed” (Subsection (A)) and “a good faith estimate of total lodging expenses reimbursed.” (Subsection B).

In other words, the *actual amount paid by the private sponsor* is what is supposed to be reported. And that amount can only come *from the sponsor*, as the Form directs. That an air fare appears on an itinerary or ticket does not mean that the sponsor paid that amount, especially if the airline has offered special discounts, etc. to the sponsor to serve as an official airline for the sponsor’s convention, or the like. Similarly, it is common for the sponsors of a meeting or convention to obtain special discounted rates for hotel rooms, or even a number of free rooms, meaning the actual total costs to the sponsor could be prorated over a number of rooms including complimentary rooms, resulting in a lower per-room cost.

OCE notes that Mr. Rodney admitted to them, long after the trip, that the actual cost paid per individual was higher than that reported by Carib News to the Members attending the Conference. OCE Report p. 47 ¶102. That information, of course, was not available to me until the OCE Report was provided to me on October 5, 2009, long after the Post-Travel Form was filed.

For these reasons, the only proper way for a Member to comply with the Rule by reporting the actual amount of “expenses reimbursed” is to obtain the information from the sponsor and report it, which is exactly what the Form itself instructs the Member to do and exactly what I did. For that reason OCE’s finding that I underreported the value of travel in my Post-Travel Form is completely unsupported and should be disregarded by this Committee.

III. Relatives Accompanying Me on the Trip

OCE found “reason to believe” that I “violated the limitation that a Member may only bring one family member with them on privately sponsored travel” by bringing both my daughter and granddaughter to the Conference. OCE Report p. 4 ¶5. In fact, I brought my sister—whose expenses were paid by Carib News as approved by this Committee—and my daughter and granddaughter, whose expenses I paid personally.

The “limitation” referred to by OCE simply does not exist. The limitation is *not* on who can accompany the Member but on who can have their *expenses covered* by the private sponsor. The applicable Rule, House Rule XXV, Section 5(b)(4)(D) provides that the expenses that may be reimbursed by a private sponsor—that is, “necessary transportation, lodging and related expenses”—“may include travel expenses incurred on behalf of a relative of the Member . . .” As explained in the House Ethics Manual, “This provision does not allow *the acceptance of travel expenses* for any accompanying individual other than a relative. Further this provision allows *the acceptance of expenses* for only one relative.” House Ethics Manual p. 101 (emphasis added).

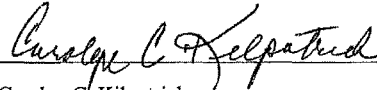
I did not accept any expenses from Carib News or any private sponsor for any relative other than my sister. This Committee specifically approved the acceptance of expenses for my sister. I personally paid for the airfare of my daughter and granddaughter and there was no incremental lodging expense at all because they stayed in my room.

For these reasons, there was clearly no violation of the House Rule and the OCE finding on this point should, again, be completely disregarded by this Committee.

IV. Conclusion

For the reasons I have set out above, OCE's findings of a "substantial reason to believe" that I violated any of the House Rules or Committee regulations are clearly wrong and should be rejected by this Committee.

I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief. Executed on October 28, 2009.


Carolyn C. Kilpatrick

866

111th CONGRESS, 1st SESSION

U.S. HOUSE OF REPRESENTATIVES

COMMITTEE ON STANDARDS OF OFFICIAL CONDUCT

**Investigation into Officially Connected Travel of House Members to Attend the Carib
News Foundation Multinational Business Conferences in 2007 and 2008.**

Appendix C

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS

U.S. HOUSE OF REPRESENTATIVES

REPORT

Review No. 09-4403

The Board of the Office of Congressional Ethics, by a vote of no less than four members, on May 29, 2009 adopted the following report and ordered it to be transmitted to the Committee on Standards of Official Conduct of the U.S. House of Representatives.

SUBJECT: Representative Donald Payne

NATURE OF THE ALLEGED VIOLATION: There is substantial reason to believe that Congressman Donald Payne's participation in the 13th Annual Caribbean Multi-National Business Conference in St. Maarten, N.A. from November 6-9, 2008, his acceptance of reimbursement of expenses to attend that conference and the Member Post Travel Disclosure Form he filed violated various provisions of House Rule XXV Section 5(b).

RECOMMENDATION: The Board of the Office of Congressional Ethics recommends that the Committee on Standards of Official Conduct further review the above described allegations concerning Congressman Payne.

VOTES IN THE AFFIRMATIVE: 6

VOTES IN THE NEGATIVE: 0

MEMBER OF THE BOARD OR STAFF DESIGNATED TO PRESENT THIS REPORT TO THE STANDARDS COMMITTEE: Leo Wise, Staff Director & Chief Counsel.

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

FINDINGS OF FACT AND CITATIONS TO LAW

Review No. 09-4403

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CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

FINDINGS OF FACT AND CITATIONS TO LAW

Review No. 09-4403

On May 29, 2009 the Board adopted the following findings of fact and accompanying citations to law, regulations, rules and standards of conduct (*in italics*). The Board notes that these findings do not constitute a determination that a violation actually occurred.

I. INTRODUCTION

1. Congressman Donald Payne attended the 13th Annual Caribbean Multi-National Business Conference in St. Maarten, N.A., from November 6-9, 2008. Congressman Payne received funds from a private source to participate in the conference.

A. Summary of Allegations

2. There is substantial reason to believe that Congressman Payne violated the requirement that he identify the “true, correct and accurate” sponsor of his travel “to the best of his knowledge” on his Member Post Travel Disclosure Form. While forms submitted to his office and the Standards Committee before the conference identified one entity as the sponsor—the Carib News Foundation—once at the conference, Congressman Payne was presented with indications that other corporations—including Citigroup, IBM, AT&T, Pfizer, Macy’s and Verizon Foundation—were also sponsors. Those indications proved to be true—the corporations were in fact sponsors of Congressman Payne’s travel according to House travel rules because the corporations had donated funds specifically for the conference (i.e. earmarked funds). Further, events that occurred in 2007 affected the Standards Committee’s ability to determine whether these corporations were sponsors in 2008:
 - a. In 2007, the House of Representatives changed the rules governing travel. Those changes placed limitations on the number of days Members of Congress could participate in events (such as conferences) when their travel was sponsored by an entity that employs or retains a lobbyist. These changes affected the annual Caribbean Multi-National Business Conference. In 2007, the Carib News Foundation continued to identify various corporations as sponsors on the

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conference agenda and on a draft version of the Private Sponsor Travel Certification Form prepared for submission to the Standards Committee for approval. However, after interacting with the counsel to the then-Chair of the Standards Committee, and apparently without the knowledge of the staff attorney reviewing the trip, the documents identifying these corporations as “sponsors” were changed and their sponsorship was not disclosed.

- b. The 2007 conduct and attendant misrepresentations appear to have directly influenced what occurred in 2008. When the Carib News Foundation submitted materials to the Standards Committee for their approval of the 2008 conference, the Carib News Foundation took the same approach as in 2007 and did not disclose the role of the corporate sponsors on the forms they submitted to the Standards Committee.
3. There is substantial reason to believe that Congressman Payne violated House Rule 25, clause 5(b)(1)(C) by accepting trip-related reimbursements from entities that employ or retain lobbyists for participating in an event for more than one day.
4. There is substantial reason to believe that Congressman Payne violated House Rule 25 clause 5(h)(i)(1)(B) by underreporting the value of the travel reimbursements he received to attend the 13th Annual Caribbean Multi-National Business Conference.
5. There is substantial reason to believe that the Carib News Foundation’s payment of travel expenses for Representative Payne and his acceptance of payment violated the Internal Revenue Code. As stated above, Carib News Charities, the name previously held by the 501(c) organization now known as the Carib News Foundation, is listed as a private foundation in the Internal Revenue’s cumulative list of charitable organizations, Publication 78. Therefore, the Standards Committee should not have approved the trip because the funds came from a prohibited source.

B. A Note on Culpability

6. These findings fall into four categories: (1) the sponsor or sponsors, as the case appears to be, of the conference; (2) the intervention of the counsel to the former Chair of the Standards Committee in the Standards Committee’s review process of the conference in 2007 and how it affected the information before the Standards Committee in 2008; (3) the accuracy of the value of the reimbursement submitted by Congressman Payne and (4) whether, because of its tax status, the Carib News Foundation could lawfully pay for Congressman Payne’s conference-related expenses.

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7. While all these topics are relevant, the Board notes that they do not all involve conduct by Congress Payne to the same degree.
 - a. As to topic 1, determining the identity of the true sponsor or sponsors implicates the conduct of both Congressman Payne and the Standards Committee. Congressman Payne told the OCE he relied on the Standards Committee to make that determination. It is the Board's view that the Member's approach is reasonable to a point. Once Congressman Payne arrived at the conference, however, he was confronted with information that other corporations were co-sponsors. That information, at least in 2008, does not appear to have been before the Standards Committee when they initially approved the 2008 travel.
 - b. As to topic 2, the intervention of the counsel to the former Chair of the Standards Committee in the Standards Committee's review of the 2007 conference did not involve Congressman Payne. Nonetheless, it directly bears on whether and to what extent the Standards Committee could determine the true sponsor of the conference in 2008.
 - c. As to topic 3, the Board notes that while the difference between the amount that Representative Payne reported and the correct amount is minimal, the amount certified is nevertheless inaccurate.
 - d. As to topic 4, limitations on Carib News Foundation's ability to pay for overseas travel of government officials, Congressman Payne told the OCE he was unaware of any such limitations. The Board finds this statement to be credible. Nonetheless, the law prohibits such payments. Therefore, the Board feels compelled to include a discussion of this issue in this referral.

C. Jurisdictional Statement

8. The allegations that are the subject of this review concern Representative Donald Payne, a Member of the United States House of Representatives from the 10th District of New Jersey. The Resolution the United States House of Representatives adopted creating the Office of Congressional Ethics directs that, "[n]o review shall be undertaken...by the board of any alleged violation that occurred before the date of adoption of this resolution."¹ The House adopted this Resolution on March 11, 2008. Because the conduct under review occurred or relates to actions taken after March 11, 2008, review by the Office of Congressional Ethics is in accordance with the Resolution.

¹ House Resolution 895 of the 110th Congress, Section 1(e).

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D. Procedural History

9. A preliminary review in this matter commenced on March 6, 2009 following a written request by at least two members of the OCE Board which was made on February 23, 2009.
10. At least three members of the Board voted to initiate a second-phase review in this matter on March 27, 2009. The Board voted to extend the second-phase review by 14 days, as provided for under the Resolution, on April 24, 2009.
11. The second-phase review ended on May 26, 2009.
12. The Board voted to refer the matter to the Standards Committee for further review on May 29, 2009.
13. The OCE requested documents from and interviews with representatives of:
 - (1) Representative Sheila Jackson-Lee's Congressional office;
 - (2) the Verizon Foundation;
 - (3) Citibank;
 - (4) American Airlines;
 - (5) IBM;
 - (6) Macy's, Inc;
 - (7) Pfizer;
 - (8) AT&T;
 - (9) Representative Kilpatrick's Congressional office;
 - (10) Representative Payne's Congressional office;
 - (11) Representative Rangel's Congressional office;
 - (12) Representative Thompson's Congressional office;
 - (13) Delegate Christensen's Congressional office;
 - (14) The Carib News; and

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(15) The Carib News Foundation

II. Multiple Entities, Including CARIB NEWS (the Newspaper), the Government of St. Maarten and Several Corporations, Sponsored Representative Payne's Trip

14. *Under House Rule 25 clause 5(d), Members are required to obtain prior approval of the Standards Committee for trips where the Member's travel expenses will be reimbursed by a private source. The Standards Committee has adopted regulations, pursuant to House Rule 25 clause 5(h)(i)(1)(B)² that requires Members to identify the "sponsor(s)," i.e. the party reimbursing travel expenses, for any trip where the payor is a private entity.*

15. There is substantial reason to believe that Congressman Payne violated the requirement that he identify the "true, correct and accurate" sponsor of his travel "to the best of his knowledge" on his Member Post Travel Disclosure Form. While forms submitted to his and the Standards Committee before the conference identified one sponsor—the Carib News Foundation—once at the conference, Congressman Payne was presented with evidence that other corporations were also sponsors. As will be discussed below, those indications proved to be true—these corporations were in fact sponsors of Congressman Payne's travel according to House travel rules because these corporations had donated funds specifically for the conference (i.e. earmarked funds).

A. Representative Payne's Knowledge of The Involvement of These Corporations in the Conference

16. On his Member Post-Travel Disclosure Form, Congressman Payne listed Carib News Foundation as the only sponsor of the 13th Annual Caribbean Multi-National Business Conference in St. Maarten, N.A. (hereafter "the trip" or "conference"³) in November 2008.⁴

² House Rule 25(5)(h)(i)(1)(B) directs the Standards Committee to establish, "regulations describing the information it will require individuals subject to this clause to submit to the committee in order to obtain the prior approval of the committee for any travel covered by this clause . . ." On February 20, 2007, the Committee issued guidelines and regulations concerning the travel restrictions and requirements.

³ The "Member/Officer Post-Travel Disclosure Form" asks the filer at question 5, "Sponsor(s) (who paid for the trip)." This in turn raises the question is a conference a "trip" or is a trip limited to the travel expenses associated with attending the trip, e.g., transportation, lodging and meal expenses? The House Ethics manual and the relevant forms use the terms "travel" and "trip" interchangeably. For example, the relevant form is called a Member/Officer Post-Travel Disclosure Form" (emphasis added). The introductory paragraph on the form provides, "[t]his form is for disclosing the receipt of travel expenses from a private source for meetings, speaking engagements, fact-finding trips or similar events in connection with official duties" (emphasis added). However, question 9 on the form asks the filer to detail, "TRIP EXPENSES" and uses as an example, "registration fees." Registration fees are not "travel" expenses unless one defines travel (or a trip) to include participating in a conference. The Board uses the

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OFFICE OF REPRESENTATIVES

Original Amendment

**U.S. House of Representatives
110th Congress**

**MEMBER / OFFICER
POST-TRAVEL DISCLOSURE FORM**

This form is for disclosing the receipt of travel expenses from a private source for meetings, speaking engagements, fact-finding trips or similar events in connection with official duties. You need not disclose government-funded or political travel on this form, or travel that is unrelated to official duties. This form does not eliminate the need to report all privately-funded travel on the Member or officer's annual Financial Disclosure Statement. In accordance with clause 5 of House Rule 25, complete this form and file it with the Clerk of the House of Representatives, B-106 Cannon House Office Building, within 15 days after travel is completed. The Clerk is to make these forms available to the public as soon as possible after they are received. Obtain the dollar amounts from the sponsor; if exact dollar amounts are unavailable, provide a good faith estimate.

Name of Member or Officer (print or type): Donald Payne

Name of Accompanying Family Member (if any): N/A

Relationship to Member/Officer (check one): Spouse Child Other (specify): _____

Date of Departure and Date of Return: Nov. 6-11, 2008

Dates at personal expense: Nov. 10-11, 2008

Itinerary (Cities of departure - destination - return): Newark, NJ - St. Maarten,
Newark, NJ

Sponsor (Who paid for the trip): Carib News Foundation

17. Congressman Payne certified that this information was "true, correct and complete" to the "best of [his] knowledge."⁵

I certify that the information contained in this form is true, complete, and correct to the best of my knowledge. I have determined that all of the expenses listed above were necessary and that the travel was in connection with my duties as a Member or Officer of the U.S. House of Representatives and would not create the appearance that I am using public office for private gain.

SIGNATURE OF MEMBER OR OFFICER: Donald Payne

DATE: Nov. 19, 2008

term "trip" to include the conference. The Board also notes that the Standards Committee treated the conference as the "trip" in its letter pre-approving Congressman Payne's trip.

⁴ Member/Officer Post-Travel Disclosure Form signed by Representative Donald Payne (Nov. 19, 2008) (Exhibit 1 at 09-4403 0002).

⁵ *Id.*

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18. In an interview with the OCE, Congressman Payne confirmed he signed this document.⁶
19. Prior to the conference, Karl Rodney, the CEO of the Carib News Foundation, submitted a Private Sponsor Travel Certification Form to Congressman Payne, which he in turn submitted to the Standards Committee that identified the Carib News Foundation as the sponsor of the trip.⁷

<p>U.S. House of Representatives Committee on Standards of Official Conduct</p> <p>PRIVATE SPONSOR TRAVEL CERTIFICATION FORM (provide directly to each House invitee)</p> <p>This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers or employees under House Rule XXV, clause 5. A completed copy of the form (and any attachments) should be provided to each invited House Member, officer or employee, who will then forward it to the Committee. The trip sponsor should NOT submit the form directly to the Committee.</p> <p><i>Private sponsors are urged to submit this form to each House invitee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the invitee not receiving approval for the trip. The submission of an incomplete form will delay the review process. Before completing this form, sponsors are urged to carefully review the Committee's private travel guidelines and advisory memoranda detailing the rules and restrictions for private travel, as well as the instructions for completing this form. Sponsors should call the Committee with any questions prior to submitting the form. Please type form.</i></p> <p>1. Sponsor(s) (who will be paying for the trip): <u>CARIB NEWS FOUNDATION</u></p>

20. Later, on that same form, Mr. Rodney represented that "the trip sponsor(s) [had] not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip."⁸

<p>15. I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s). (signify "yes" by checking box): <input checked="" type="checkbox"/></p>
--

21. Rodney also certified that the information was "true, complete, and correct."⁹

⁶ Memorandum of Interview of Representative Donald Payne (May 12, 2009) (Exhibit 2 at 09-4403 0030).

⁷ Private Sponsor Travel Certification Form signed by Karl Rodney (Oct. 3, 2008) (Exhibit 1 at 09-4403 0007).

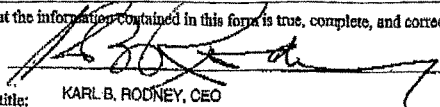
⁸ *Id.*

⁹ *Id.*

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23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: 

Name and title: KARL B. RODNEY, CEO

22. Prior to the conference, the Standards Committee approved the reimbursement of Congressman Payne's expenses by the Carib News Foundation.¹⁰

U.S. House of Representatives
 COMMITTEE ON STANDARDS OF
 OFFICIAL CONDUCT
 Washington, DC 20515

October 16, 2008

The Honorable Donald M. Payne
 U.S. House of Representatives
 2209 Rayburn House Office Building
 Washington, DC 20515

Dear Colleague:

Pursuant to House Rule 25, clause 5(d)(2), the Committee on Standards of Official Conduct hereby approves your proposed trip to St. Maarten, N.A. scheduled for November 6 to 11, 2008 sponsored by the Carib News Foundation. We note that this trip includes 2 days at your personal expense.

23. At the conference, several corporations, including Citibank, IBM, AT&T, and others, were identified as "sponsors."¹¹
24. On November 6, 2009, at the conference's opening dinner, Representative Donald Payne spoke. In an interview with the OCE, Congressman Payne confirmed that he thanked several corporations identified at the conference as "sponsors."¹²

¹⁰ Letter from the Committee on Standards of Official Conduct to Representative Donald M. Payne (Oct. 16, 2008) (Exhibit 1 at 09-4403 0004-5).

¹¹ Photographs taken at the 13th Annual Caribbean Multi-National Business Conference (Exhibit 5 at 09-4403 0066-74) (The Board notes that the source of this information may have a bias, interest, or motive in this matter.).

¹² Memorandum of Interview of Representative Donald Payne (May 12, 2009) (Exhibit 2 at 09-4403 0030).

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25. On November 7, 2008, the conference's organizer, Karl Rodney, began the first morning program by thanking Citigroup, Pfizer, Macy's, IBM, AT&T, the Verizon Foundation and American Airlines, as well as their executives by name, who were present.¹³ This morning session was recorded by an individual attending the conference and the recording was subsequently transcribed. The OCE obtained a copy of the transcript. Mr. Rodney described AT&T as "support[ing] the Conference all 13 years" (this was the thirteenth annual conference).¹⁴
26. Michael Flanigan, an executive from Citibank, spoke immediately after Mr. Rodney and described Citibank as the "lead sponsor of the premier event."¹⁵
27. Following Mr. Flanigan's remarks, and the remarks of several other speakers, Representative Carolyn Cheeks Kilpatrick spoke. At the end of her remarks she stated, "[a]nd to the sponsors, by the way, all of you, we couldn't do this, be with you, help Karl if you weren't here with us so we say thank you very much, you are so important. To all of the sponsors, thank you very much."¹⁶
28. In an interview with the OCE, Congressman Payne told the OCE he attended the conference from November 5-8.¹⁷
29. In addition to these comments, signs for the conference displayed these corporations' logos, including signs hung behind the speaker's podium.¹⁸

¹³ Transcript of Recording of November 7, 2008 AM Session of the 13th Annual Caribbean Multi-National Business Conference (Exhibit 3 at 09-4403 0033-35) (The Board notes that the source of this information may have a bias, interest, or motive in this matter).

¹⁴ *Id.*

¹⁵ *Id.* at 09-4403 0035.

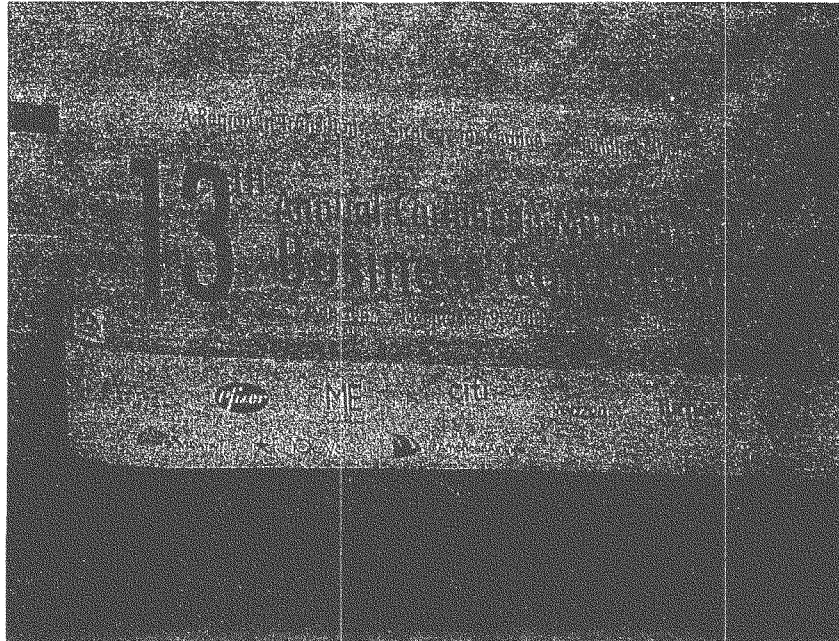
¹⁶ Transcript of Recording of November 7, 2008 AM Session of the 13th Annual Caribbean Multi-National Business Conference (Exhibit 3 at 09-4403 0050).

¹⁷ Memorandum of Interview of Representative Donald Payne (May 12, 2009) (Exhibit 2 at 09-4403 0030).

¹⁸ Photographs taken at the 13th Annual Caribbean Multi-National Business Conference (Exhibit 5 at 09-4403 0066).

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30. In an interview with the OCE, Congressman Payne stated that he relied on the entity that invited him to the conference, the Carib News Foundation, to identify the sponsor of his trip and, further, that he relied on the Standards Committee, who pre-approved his trip, to determine if that information was accurate.¹⁹ As a result, Congressman Payne told the OCE that the involvement of these corporations in the conference did not raise questions in his mind about whether the Carib News Foundation was the sole sponsor of the conference.²⁰

31. The Board notes that the practice of relying entirely on the Standards Committee to determine the sponsor of a Member's travel carries with it a degree of risk. Further, while Members are required to receive pre-approval from the Standards Committee before they travel, it is the Member, and not the Standards Committee, that is ultimately accepting the travel from a private sponsor. The Board reads the pre-clearance process as

¹⁹ Memorandum of Interview of Representative Donald Payne (May 12, 2009) (Exhibit 2 at 09-4403 0031).

²⁰ *Id.*

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a free-standing requirement the House adopted in 2007. There is no indication that the House intended it to supplant, or at the very least to completely supplant, Members' responsibility to abide by the travel rules when they accept privately sponsored travel. As a result, it is the Board's view that a reasonable reading of the travel rules places responsibility for identifying the sponsor with both the Member and the Standards Committee and not the Standards Committee alone. This shared responsibility also reflects the practical reality that, because the Member actually takes the trip, and the Standards Committee does not, the Member may, in certain circumstances, have access to information about the trip not available to the Standards Committee. In this instance, the Member's had information about the sponsors of the conference not available to the Standards Committee, namely that numerous corporations were identified as sponsors of the conference.

32. Further, as described below, these other entities were, in fact, sponsors of the conference.

B. CARIB NEWS also Sponsored Congressman Payne's Travel

33. Karl Rodney is the publisher of the CARIB NEWS, a weekly newspaper published in New York. He also identified himself as the CEO of the Carib News Foundation on the Private Sponsor Travel Certification described above.²¹

34. According to Mr. Rodney, "general funds" of CARIB NEWS were "pooled" with payments from corporate sponsors, made both to CARIB NEWS and the Carib News Foundation and fees from attendees at the conference to pay conference expenses including "travel" and "hotel payments."²²

35. Therefore, CARIB NEWS was also effectively a sponsor of Congressman Payne's trip.

C. Corporate Donations Were Earmarked for the Conference

36. *According to the House Ethics Manual:*

The rule and implementing regulations are concerned with the organization(s) or individual(s) that actually pay for travel. Thus, for example, when a nonprofit organization pays for travel with donations that were earmarked, either formally or informally, for the trip, each such donor is deemed a —private source for the

²¹ Private Sponsor Travel Certification Form signed by Karl A. Rodney (Oct. 16, 2008) (Exhibit 1 at 09-4403 0009).

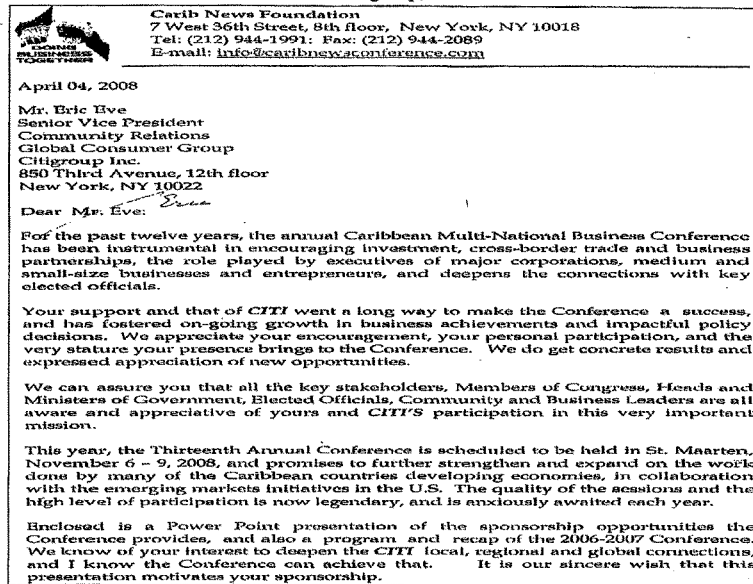
²² Letter from Joel Cohen, Counsel for Karl Rodney (May 18, 2009) (Exhibit 6 at 09-4403 0076-77).

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trip and (1) must be publicly disclosed as a trip sponsor on the applicable travel forms and (2) must itself be required to satisfy the above standards on proper sources of travel expenses.

37. In the course of conducting its review, the OCE has learned that the Carib News Foundation solicited earmarked funds for the conference. For example, Carib News Foundation sent a solicitation letter to Citigroup, Inc.²³



38. Attached to this solicitation letter was a PowerPoint presentation.²⁴ The presentation solicits money only for the conference and not for any other purpose, outlining the benefits of each level of sponsorship – Platinum, Gold, and Silver, along with lesser levels of sponsorship – in terms of the conference.²⁵ In each instance, the sponsorship covers travel related expenses such as gala events and meals.

²³ Letter from Carib News Foundation to Mr. Eric Eve, Citigroup, Inc. (Apr. 4, 2008) (Exhibit 7 at 09-4403 0081-82) (a nearly identical letter was sent to IBM, AT&T, Pfizer, Verizon Foundation and others).

²⁴ *Id.* at 09-4403 0083-98

²⁵ *Id.*

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PARTICIPATION

PLATINUM LEVEL - \$75,000

- ◆ Keynote Speaker at Main Event
- ◆ Sponsor Private VIP Reception and specially arranged forum
- ◆ Special Awards Presentation
- ◆ Display, Exhibition and signage
- ◆ Area of Conference -Reserved for exclusive sponsorship
- ◆ Full page Ad in program
- ◆ Air Transportation for 2 people
- ◆ Accommodations: One Suite and One Standard Room
- ◆ Included in all printed materials
- ◆ Included in Internet promotion
- ◆ Display company logo and link to our website
- ◆ Sponsor of a Gala Event
- ◆ Sponsor and Participate in a workshop
- ◆ Representative listed in program with bio and photo

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PARTICIPATION

GOLD LEVEL - \$50,000

- ◆ Sponsor a Workshop
- ◆ Sponsor a Gala Event
- ◆ Display, Exhibition and signage
- ◆ Included in all Printed Material
- ◆ Included in all Internet Promotion
- ◆ Display of Company Logo and Link to Our Website
- ◆ Full Page Ad in Program
- ◆ Representation in the Brochure
- ◆ Air Transportation & room accommodations for 1

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PARTICIPATION

SILVER LEVEL - \$25,000

- ◆ Sponsor & Participate in a Workshop
- ◆ Display and Exhibition
- ◆ Banner in Public areas & at workshop
- ◆ Included in all printed materials
- ◆ Included in Radio and TV Promotions
- ◆ Included in the internet promotion
- ◆ Sponsor an event i.e. breakfast, lunch or dinner
- ◆ Full Page ad in program and recap
- ◆ Representatives listed in program with bio & photos
- ◆ Representatives listed in brochure

39. The OCE also learned that at least four of the corporations identified at the conference did, in fact, make payments to the Carib News Foundation and CARIB NEWS (the newspaper) earmarked for the conference. The Carib News Foundation itself appears to

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be nothing more than a conduit in this case, and a partial one at that, for payments from corporations to support the conference. There is no evidence that the organization has filed a tax return with the IRS, under either Carib News Foundation or Carib News Charities, since 2005.²⁶ On its 2005 Form 990, the Carib News Foundation is shown as having no assets, no income and no expenses.²⁷ Not a single witness from a sponsor interviewed by the OCE knew of any other work of the Foundation. Indeed one witness, from IBM, was not aware that the Foundation played a role in the conference.²⁸

40. **Citigroup.** Citigroup made a \$75,000 payment to the CARIB NEWS for the conference.²⁹

41. **Verizon Foundation.** Verizon Foundation made a \$35,000 payment to the Carib News Charities³⁰ for the conference.³¹

²⁶ Letter from IRS to OCE (April 17, 2009) (Exhibit 8 at 09-4403 0103).

²⁷ *Id.* at 09-4403 0103-115.2.

²⁸ Memorandum of Interview of Representative from IBM (May 8, 2009) (Exhibit 9 at 09-4403 0119).

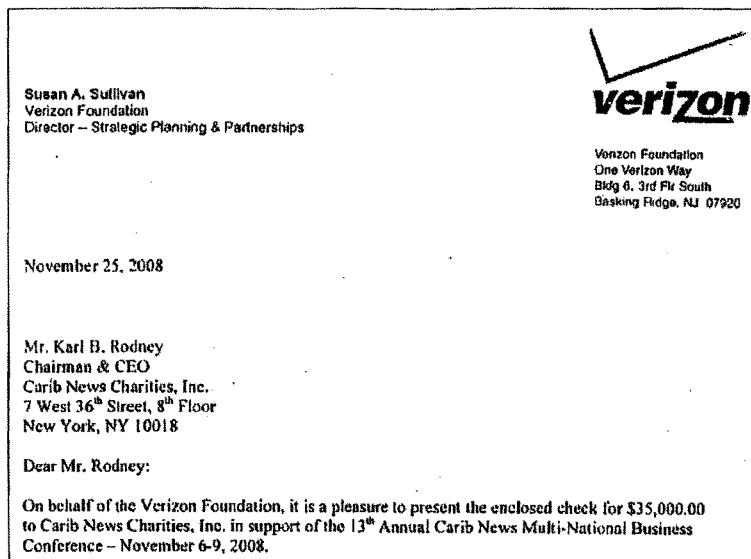
²⁹ Documents submitted to the OCE by Citigroup (Exhibit 7 at 09-4403 0079-98).

³⁰ Mr. Rodney accepted corporate payments under the names of three entities: The Carib News, the Carib News Foundation, and the Carib News Charities. According to the Secretary of State for the State of New York, the organization that currently operates as the Carib News Foundation originally operated under the name the Carib News Charities.

³¹ Documents Submitted to the OCE by the Verizon Foundation (Exhibit 10 at 09-4403 0124-127).

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42. Representative 1 of the Verizon Foundation said the Verizon Foundation funded the Carib News Foundation for the first time in 2008 and that the grant was issued to provide funding for the 13th Annual Caribbean Multi-National Business Conference.³²

43. **IBM.** IBM made a \$20,000 payment to Carib News Foundation for the conference as indicated on the invoice that CARIB NEWS, INC. (not Carib News Foundation) sent IBM.³³

³² Memorandum of Interview of Representative 1 of Verizon Foundation (Mar. 23, 2009) (Exhibit 11 at 09-4403 0130).

³³ Documents submitted by IBM to the OCE (Exhibit 13 at 09-4403 0147).

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CARIB NEWS INC. 7 WEST 36TH STREET 8TH FLOOR NEW YORK, 10018 212-944-1991		Invoice					
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Description	Amount						
Sponsorship Multi-National Business Conference 2008 TAX ID 13-362060	20,000.00						

44. **Macy's.** Macy's made a \$35,000 payment to CARIB NEWS for the conference.³⁴
45. **Pfizer.** Pfizer made a \$25,000 payment to CARIB NEWS for the conference.³⁵
46. Only American Airlines explicitly limited their sponsorship of the conference to individuals who were not elected officials, prohibiting CARIB NEWS from using any part of their sponsorship on Members of Congress and other government officials and their staff.³⁶ No other sponsor with whom we spoke placed restrictions on how or on whom their contribution could be spent. The only expectation was that the contribution would be used for expenses associated with the conference.

D. Because Entities that Employ or Retain Lobbyists Sponsored the Event, Congressman Payne's Involvement Should Have Been Limited to One Day

47. *According to the House Ethics Manual:*

³⁴ Memorandum of Interview of Representative 1 of Macy's (Exhibit 20 at 09-4403 0240).

³⁵ Interview with Investigative Counsel on May 22, 2009.

³⁶ Documents submitted by American Airlines to the OCE (Exhibit 14 at 09-4403 0150-154) (American Airlines provided an in-kind contribution in the form of ten roundtrip tickets to be used by Carib News in any manner they chose with the exception that no ticket could be used for an elected official or the official's staff or family. The estimated value of their contribution was between \$6,200 and \$7,500).

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One-Day Event Trip. *The sole exception to the general prohibition on accepting officially-connected travel from a private source that retains or employs lobbyists or agents of a foreign principal is for trips involving attendance at or participation in one-day event (exclusive of travel time and an overnight stay).*

Under the rule, it is permissible for a Member or staff person to accept and meals related to a single night's lodging and meals related to the trip, if offered by the trip sponsor. Members and staff must limit their involvement in connection with the event to a single calendar day, exclusive of travel time and an overnight stay. A Member or staff person may therefore attend only a single day of a multiple-day conference, forum, or other event that is being hosted primarily for individuals other than congressional invitees.

Under the Committee's travel regulations and guidelines implementing the travel provisions of the gift rule, the Committee may permit a second night's stay when determined —on a case-by-case basis to be practically required to participate in the one-day event (House Rule 25, clause 5(b)(1)(C)). Some circumstances in which the Committee may permit a second night's stay are for certain long-distance trips, when a Member or staff person is participating in a full day's worth of officially-connected activities such that a second night's stay is necessary to accomplish the purpose of the trip, or other exceptional circumstances that are described in detail by the traveler. The traveler will be personally responsible for any expenses incurred beyond those allowed by the Committee in connection with the second night's stay.³⁷

48. Citigroup, IBM and Verizon employ or retain lobbyists.³⁸
49. Congressman Payne spent four days at the conference at the expense of the third-party.³⁹
50. There is substantial reason to believe that Congressman Payne violated *House Rule 25, clause 5(b)(1)(C)* by accepting trip-related reimbursements from entities that employ or retain lobbyists for participating in an event for more than one day.

³⁷ House Ethics Manual at 92-93 citing (House Rule 25, clause 5(b)(1)(C)) (emphasis in original).

³⁸ Clerk of the House of Representatives Lobbying Disclosure Report 2008 (excerpt attached hereto as "Exhibit 15").

³⁹ Member/Officer Post-Travel Disclosure Form signed by Representative Donald Payne (Nov. 19, 2008) (Exhibit 1 at 09-4403 0002).

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E. The Government of St. Maarten Made In-Kind Donations to the 2008 Conference and Played a Significant Role in Planning, Organizing and Conducting the 2008 Conference

51. The Government of St. Maarten was the host of the 2008 conference.
52. In that capacity, the Government of St. Maarten provided in-kind donations to support the conference and also had a substantial role in planning the conference. As a result, it was effectively a sponsor of the 2008 conference.⁴⁰
53. Rodney provided the Leader of Government of St. Maarten, Commissioner Sarah Wescott-Williams, with a list of "Basic Requirements to Host Caribbean Multi-National Business Conference."⁴¹ These included:

⁴⁰ In 2007, the "host" of the conference was the Government of Antigua and Barbuda. In the event that the Government of Antigua and Barbuda provided the same support as St. Maarten did in 2008, then the members may have accepted gifts from a foreign government which would have been reportable under the Foreign Gift and Decorations Act. In addition, if the Government of Antigua provided these gifts to the Members, and if they were more than \$335 in value, then the Members should have disclosed them on their financial disclosure form for 2007, which was filed in May 2008.

⁴¹ Letter from Karl Rodney to Commissioner Sarah Wescott-Williams (Aug. 13, 2008) (Exhibit 16 at 09-4403 0163).

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- To provide the care and comfort for the VIP's attending i.e.
 - To provide 25 all-inclusive rooms for the VIP's and members of Congress attending;
 - To provide appropriate mode of transportation for VIP's and members of Congress - cars or specialized vans - not buses;
- To be a designated sponsor in one of the categories: *Title, Main or Regular Sponsor* (See Attachment)
- To organize a "Host Country Evening" - The Friday evening, the host country will host at an appropriate location an evening of food, refreshment, cultural presentation and entertainment.
- Provide for local entertainment for the various functions:-
 - The Opening Ceremonies
 - The Reception
 - The Gala Dinner
- To assist in Promotion and Publicity of the conference both locally and through international offices and official publications.
- Assist in securing competitive hotel rates.
- Equip and staff conference secretariat.
- Prime Minister to issue invitations along with CARIB NEWS to members of the US Congress, other Prime Ministers and Ministers of Government.
- Participate in the Forum with Members of Congress.
- Arrange tours and activities of interest for VIP's and/or their spouse.

54. According to a statement from Mr. Rodney submitted to the OCE, the Government of St. Maarten, (1) developed local Host Committees to facilitate local planning; (2) helped negotiate the rate with the hotel, (3) assisted in developing the theme of the Conference, (4) assisted in identifying local speakers, including the Leader of Government, (5) assisted in local publicity, (6) provided local entertainment, including a school choir and cultural items, (7) arranged Host Country Evening on Friday, November 8 (the whole group was transported to another property for refreshments and entertainment), (8) helped with local transportation for some CARIB NEWS employees and helped arrange accommodations for some guests (not paying for such accommodations), (9) participated as event speakers, and (10) issued invitations to attend to specially invited guests.⁴²

⁴² Letter from Joel Cohen, Counsel for Karl Rodney (May 18, 2009) (Exhibit 6 at 09-4403 0076-77).

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These contributions to the conference were all in-kind, according to Mr. Rodney, and he did not provide an estimated value for them.⁴³

55. In addition, because these donations to the conference are from a foreign government, Members are required to take certain actions under the Foreign Gifts and Decorations Act.⁴⁴
56. Representative Payne told the OCE that he was unaware of what role the Government of St. Maarten played in the conference.⁴⁵

III. Role of the Chair's Counsel in the Approval of the 12th Annual Caribbean Multi-National Business Conference in 2007

57. As previously stated, Congressman Payne told the OCE that he relied on the Standards Committee to determine who the true sponsor of the conference was based on information the Standards Committee received from the organization that invited him to the conference—the Carib News Foundation.⁴⁶ In the course of the Board's review, the OCE requested documents from Mr. Karl Rodney, the CEO of the Carib News Foundation. Mr Rodney voluntarily submitted documents to the OCE that included, among other things, communication with certain members of the staff of the Committee on Standards of Official Conduct in 2007. The contents of these documents from 2007 are relevant because they indicate the role of the corporations was concealed from the Committee in 2008.
58. The Board requested that the Committee provide the information submitted to it for 2008 and the Committee declined to do so.
59. The documents submitted by Mr. Rodney show that in 2007 the CARIB NEWS initially identified, on several occasions, other corporations as sponsors of the Conference. The designation of these corporate entities as sponsors presented a problem for CARIB NEWS and the Members who wished to attend the conference insofar as their attendance would be limited to one day. In 2007, as a result of changes in the travel rules, a Member could not, in most instances, participate in an event (such as a conference) for more than one day if their travel to and participation in the event was paid for by an entity that

⁴³ *Id.*

⁴⁴ 5 U.S.C. § 7342.

⁴⁵ *Id.*

⁴⁶ Memorandum of Interview of Representative Donald Payne (May 12, 2009) (Exhibit 2 at 09-4403 0030).

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employed or retained a lobbyist.⁴⁷ Many of the corporate entities who sponsored the 2007, as well as the 2008 conference, employed or retained lobbyists. Although CARIB NEWS initially identified these entities as sponsors, following interactions with the counsel to the then-chair of the Committee, apparently without the knowledge of the Standards Committee staff attorney assigned to review the trip, the documents identifying these organizations as sponsors were changed.

60. Subsequently, in 2008, the Carib News Foundation submitted documents that omitted the role of these other corporations as sponsors of the conference. Further, the staff attorney assigned to review the trip in 2008 was not the same staff attorney that reviewed the trip in 2007.
61. The earliest communication between CARIB NEWS or the Carib News Foundation and anyone associated with the Ethics Committee in the documents submitted to the OCE from Mr. Rodney is an e-mail dated September 17, 2007 from Patricia Louis, an Executive Assistant at CARIB NEWS, to Dawn Kelly Mobley, Counsel to the then-Chair of the Ethics Committee.⁴⁸
62. The next day, on September 18, 2007, Ms. Mobley responded and asked for “any information on your sponsor’s status.”⁴⁹
63. That same day Ms. Louis responded, indentifying multiple corporations as “sponsors” of the trip.⁵⁰

⁴⁷ House Ethics Manual (2008) at 92-93 (citing House Rule 25, clause 5(b)(1)(C)).

⁴⁸ E-mail from Patricia Louis to Dawn Kelly Mobley (Sept. 17, 2007, 3:47 PM EST) (Exhibit 17 at 09-4403 0212) (The Board elected not to interview Ms. Mobley and Ms. Olson because the Standards Committee voted against disclosing information to the OCE. The Board determined that it would have been an act of bad faith on the part of the OCE to attempt to interview staff and former staff of the Standards Committee in light of the Committee’s refusal to grant OCE access to their records.)

⁴⁹ E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 18, 2007, 12:57 PM EST) (Exhibit 17 at 09-4403 0212).

⁵⁰ E-mail from Patricia Louis to Dawn Kelly Mobley (Sept. 18, 2007) (Exhibit 17 at 09-4403 0212) (The Board notes that while the document that contains the e-mail does not have a header which indicates a date and time, both the e-mail before it and responding to it are dated September 18, 2007).

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**We had received the forms from Shelley.
The sponsors to date are : MACYS, PFIZER, AMERICAN AIRLINES, GOLDEN KRUST
BAKERY, CARIBBEAN FOOD DELIGHTS, PREFERRED HEALTH PARTNERS, IBM,
AT&T/CINGULAR**

Regards

Patricia Louis
Executive Assistant
CARIB NEWS
7 West 36th Street, 8th Floor
New York, NY 10018

64. In response that same day, Ms. Mobley asked, “[d]o any of these organizations have or retain a lobbyist?”⁵¹
65. The next day, Ms. Mobley further responded asking Ms. Louis whether she, Ms. Mobley, should “assume” the sponsor was CARIB NEWS, despite the fact that Ms. Louis had not identified CARIB NEWS as a sponsor.⁵² The Board notes that in her e-mail, Ms. Louis did not identify CARIB NEWS as a sponsor. Further, Ms. Mobley acknowledged that she had been told corporations identified by Ms. Louis were “sponsoring food and other parts of the Antigua travel.” Under House rules in place at the time, and under current rules, sponsoring a meal makes these corporations sponsors of a Member’s travel.⁵³ The Board also notes Ms. Mobley’s use of the phrase “safe review,” which the Board takes to mean a review which results in approval of the trip.

⁵¹ E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 18, 2007, 7:03 PM EST) (Exhibit 17 at 09-4403 0211).

⁵² E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 19, 2007, 2:16 PM EST) (Exhibit 17 at 09-4403 0211).

⁵³ House Ethics Manual (2008) at 97-98.

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From: Kelly Mobley, Dawn
 Sent: Wednesday, September 19, 2007 2:16 PM
 To: 'plouis'
 Subject: RE: Draft Program - 2007 Business Conference (No agenda or program attached)

Patricia:

I understand that several organizations will take part in sponsoring food and other parts of the Antigua travel. However, I need clarification on the *official* sponsor; that organization providing travel, lodging, and organizing the trip? Am I to assume it is CARIB NEWS? The official sponsoring organization must not retain or employ a registered lobbyist or registered foreign agent (and the sponsor must have a direct and immediate relationship with the event or location being visited). To assist with this, I am scanning information/guidelines and emailing in just a moment. Please provide a fax number if that method of submittal will be more helpful. If there is someone handling this matter, please provide me their direct contact information as I must ensure adherence to these new guidelines pre-travel.

In any event, I do need to know who the official sponsor will be. I have assigned a staff attorney to review your documents and will remain in contact with you until this matter is finalized.

Please respond today or tomorrow at the latest. I will be travelling for a while thereafter and must ensure that my staff attorney has all that is necessary for a safe review.

Dawn Kelly Mobley
 Ethics Counsel for Congresswoman Stephanie Tubbs Jones
 Chairwoman, Committee on Standards of Official Conduct
 U.S. of Representatives
 Washington, DC 20515
 202/226-7103

66. Later in the afternoon on September 19, 2007, Ms. Mobley sent Ms. Louis another e-mail where she discussed the limitations posed by the new travel rules the House had adopted in 2007. Ms. Mobley told Ms. Louis, "the new rules might prohibit some things you were able to do with so many different sponsors in the past." Thus, Ms. Mobley again acknowledged that these corporations were sponsors and that the new travel rules affected the nature of their participation in the trip.⁵⁴

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
 Sent: Wednesday, September 19, 2007 3:23 PM
 To: plouis
 Subject: RE: Draft Program - 2007 Business Conference (No agenda or program attached)

Lastly, just send the sponsor form asap for review. The new rules might prohibit some things you were able to do with so many different sponsors in the past, but until we get the form, we can't make the most informed decision. I have let the Congresswomen know we are awaiting your sponsor form. Just as you do, they would also like assurance. Thank you.

67. On September 21, 2007, Ms. Louis responded.⁵⁵

⁵⁴ E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 19, 2007, 3:23 PM EST) (Exhibit 17 at 09-4403 0211).

⁵⁵ E-mail from Patricia Louis to Dawn Kelly Mobley (Sept. 21, 2007, 1:56 PM EST) (Exhibit 17 at 09-4403 0209).

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Registration

From: plouis [plouis@nycaribnews.com]
Sent: Friday, September 21, 2007 1:56 PM
To: 'Dawn.KellyMobley@mail.house.gov'
Subject: Re Sponsorship Information

The official sponsor of the conference is the CARIB NEWS FOUNDATION, a not-for-profit 501C3 Organization that provides educational information about the Caribbean Region and its relationship with the US in doing business and developing good neighborly ties with the United States, security, health, education etc.

The CARIB NEWS FOUNDATION does not retain or employ a registered lobbyist or registered foreign agent.

Please use me as your contact for the purposes of this Conference.

The form will be emailed to you this afternoon.

Regards

Patricia Louis

Executive Assistant
CARIB NEWS
7 West 36th Street, 8th Floor
New York, NY 10018

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68. That same day, on September 21, 2007, Ms. Louis faxed Ms. Mobley a Private Sponsor Travel Certification Form. On the form Carib News Foundation is listed as the sponsor of the trip in question 1.⁵⁶

<p>U.S. House of Representatives Committee on Standards of Official Conduct</p> <p>PRIVATE SPONSOR TRAVEL CERTIFICATION FORM (provide directly to each House invitee)</p> <p>This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers or employees under House Rule XXV, clause 5. A completed copy of this form (and any attachments) should be provided to each invited House Member, officer or employee, who will then forward it to the Committee. The trip sponsor should NOT submit the form directly to the Committee.</p> <p>Private sponsors are urged to submit this form to each House invitee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the invitee not receiving approval for the trip. The submission of an incomplete form will delay the review process. Before completing this form, sponsors are urged to carefully review the Committee's private travel guidelines and advisory memoranda detailing the rules and restrictions for private travel, as well as the instructions for completing this form. Sponsors should call the Committee with any questions prior to submitting the form. Please type form.</p> <p style="text-align: center;">Carib News Foundation</p> <p>1. Sponsor(s) (who will be paying for the trip): _____</p>

69. However, the Carib News Foundation listed a number of corporations as private sponsors, each with responsibility for planning and conducting the trip, in question 12.⁵⁷ This is at least the second instance where the Carib News Foundation identified these corporations as the trip's sponsors.

<p>12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip. Pfizer-Education/Health AT&T and IBM: provide technology to the region. MACYS: seek new vendor sources, Citibank: opportunities in the region.</p>

70. This prompted the following e-mail from Ms. Mobley to Ms. Louis.⁵⁸ The Board notes that Ms. Mobley stated she was "working through" the Carib News Foundation's forms "before leaving them with our staff attorney."

⁵⁶ Private Sponsor Travel Certification Form (Sept. 21, 2007) (Exhibit 17 at 09-4403 0199).

⁵⁷ *Id.*

⁵⁸ E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 25, 2007, 12:42 PM EST) (Exhibit 17 at 09-4403 0196).

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From: Kelly Mobley, Dawn
 Sent: Tuesday, September 25, 2007 12:42 PM
 To: plouis
 Subject: Query

I am working through your forms before leaving them with our staff attorney and have a question. Query: Why did you not list CARIB NEWS as the sponsor as you'd indicated instead of Macy's, etc. The official sponsor for travel, lodging, and planning is still Carib News, correct?

71. Later that same day, Ms. Mobley queried further.⁵⁹ At least as of this date, following at least two instances where Ms. Louis identified these corporations as sponsors, Ms. Mobley appeared to treat these entities as "co-sponsors."

From: Kelly Mobley, Dawn
 Sent: Monday, October 01, 2007 5:08 PM
 To: Kelly Mobley, Dawn
 Subject: RE: Query

We are trying to work through a problem in approving the co-sponsors place. Are they each paying for a one-day, widely attended event or more days? Please read the Gift Rules I forwarded you on this matter.

72. On October 3, 2007, Ms. Mobley informed Ms. Louis that Susan Olson was the staff attorney assigned to review the trip.⁶⁰
73. A copy of the Private Sponsor Travel Certification Form provided to a Member's office on October 5, 2007, shows that by October 5, 2007, following its interaction with Ms. Mobley, Carib News Foundation changed its answer to question 12 regarding other private sponsors. As previously highlighted, as of September 21, 2007, Carib News Foundation provided the following answer to question 12.⁶¹

12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip: Pfizer Education/Health AT&T and IBM - provide technology to the region, MACYS - seeks new vendor sources, Citibank - support office in the region.

74. However, as of October 5, 2007, it provided a different answer to question 12.⁶²

⁵⁹ E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 25, 2007, 5:08 PM EST) (Exhibit 17 at 09-4403 0196).

⁶⁰ E-mail from Dawn Kelly Mobley to Patricia Louis (Oct. 3, 2007, 12:39 PM EST) (Exhibit 17 at 09-4403 0193).

⁶¹ Private Sponsor Travel Certification Form (Sept. 21, 2007) (Exhibit 17 at 09-4403 0200).

⁶² Private Sponsor Travel Certification Form (Oct. 5, 2007) (Exhibit 18 at 09-4403 0215).

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<p>12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip:</p> <p>CARIB NEWS FOUNDATION (SEE ATTACHED SHEET)</p>
--

And the attached sheet provided the following information.⁶³

<p>Item #12</p> <p>CARIB NEWS FOUNDATION is organized to provide education and information about the Caribbean in the area of Business, Education, Health and Culture, Promote Good neighborly within the United States and the hemisphere.</p>
--

On October 10, 2007, Susan Olson, the staff attorney on the Standards Committee assigned to review the trip e-mailed Ms. Louis the following questions⁶⁴ (and copied Ms. Mobley and the Chief Counsel of the Standards Committee at that time, Bill O'Reilly). While the Private Sponsor Travel Certification Form for the trip had been changed by this date, the draft agenda for the conference apparently had not and still showed corporate sponsors for various events. What Ms. Olson does not appear to be aware of is the fact that Carib News Foundation had previously identified the same corporations she is raising questions about as private sponsors on its original Private Sponsor Travel Certification form.

<p>Original Message</p> <p>From: Olson, Susan [mailto:Susan.Olson@mail.house.gov]</p> <p>Sent: Wednesday, October 10, 2007 4:01 PM</p> <p>To: plouis@ny.caribnews.com</p> <p>Cc: Dawn.Kelly.Mobley@mail.house.gov; O'Reilly, Bill</p> <p>Subject: Carib News - Pre-trip Approval Issues</p> <p>Dear Mrs. Louis:</p> <p>With regard to the pre-trip approval requests for the Carib News Foundation's</p>
--

⁶³ *Id.* at 09-4403 0219

⁶⁴ E-mail from Susan Olson to Patricia Louis (Oct. 10, 2007, 4:01 PM EST) (Exhibit 17 at 09-4403 0181-182).

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(Foundation) trip to Antigua, the issues involving sponsorship are as follows:

While the sponsor form that you completed indicates that the Foundation is the sole sponsor of the 2007 trip, the draft schedule, however, indicates that the following entities are "sponsoring" sessions, events, etc. during this trip:

- o Antigua Government
- o Sandals
- o Royal Caribbean Bakery
- o CITI
- o Pfizer
- o Macy's
- o AT&T
- o HSBC
- o IBM
- o Goodhope International
- o Preferred Health Partners
- o Antigua & Barbuda
- o American Airlines
- o Golden Krust

Last year the Foundation provided the following information regarding these "additional sponsors" for the November 9 to 12, 2006 trip:

The Foundation, which is a 501(c)(3) nonprofit organization, will be paying for the Members' travel expenses including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a "contribution to the overall pool of expenses in contribution to the Foundation" which is used to "underwrite the overall expenses of the Conference," primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organization who will be attending and participating in the Conference.

Accordingly, the Committee's Advisory Opinion, dated October 27, 2006, provided that all of the organizations that provided financial underwriting for the trip along with the Foundation were required to be listed as the "trip sponsors" on the participating Members' post-travel disclosure form and their 2006 annual financial disclosure statements.

Accordingly, you need to provide information describing the role of these "additional sponsors" as listed in the 2007 trip draft schedule for this current trip. Without such information, I cannot proceed with the review of the pre-trip approval requests for the Foundation's Antigua trip.

Susan L. Olson
Counsel
House Committee on Standards of Official Conduct

75. The Committee's Advisory Opinion dated October 27, 2006 indicates, as Ms. Olson wrote, that Carib News Foundation told the Standards Committee in 2006 that there were several corporate entities that sponsored the conference.⁶⁵ The "Advisory Opinion" did not conclude that these entities were, in fact, the trip's sponsors, as the e-mail seems to indicate.

⁶⁵ Committee on Standards of Official Conduct, Advisory Opinion (Oct. 27, 2006) (Exhibit 17 at 09-4403 0205-207).

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76. A draft agenda for the conference dated October 3, 2007, identified a “sponsor” for each event listed.⁶⁶ This appears to be the version of the agenda that Olson is referring to in her e-mail. For example, “Preferred Health Partners” is identified as the sponsor of this event on “Port & Airport Security—The Mandates.”⁶⁷

PORT & AIRPORT SECURITY – THE MANDATES	
Moderator	Lance Ogiste Hon. Bennie Thompson
Speakers	Dr. Basil Wilson
Venue	
Sponsor	Preferred Health Partners

And Citi is identified as the sponsor of this event on “Community Outreach – Education – Access and Collaboration.”⁶⁸

4:00pm – 5:30pm	COMMUNITY OUTREACH – EDUCATION – ACCESS AND COLLABORATION
Venue	Off Site
Sponsor	CITI
Moderator	Michael Flanigan
Speakers	Dr. Edison Jackson – President Medgar Evers College Hon. Danny Davis – Member of Congress Hon. David M. Dinkins – Former Mayor New York City Hon. Eddie Bernice Johnson – Member of Congress Hon. Bertrand Joseph

⁶⁶ Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 3, 2007) (Exhibit 19 at 09-4403 0221-237).

⁶⁷ *Id.* at 09-4403 0226-227.

⁶⁸ *Id.* at 09-4403 0223.

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77. Ms. Louis forwarded Ms. Olson's e-mail to Ms. Mobley, Congressman Charles Rangel's Chief of Staff George Dalley and Delegate Donna Christensen's scheduler Shelley Thomas, and asked them to advise her on a response.⁶⁹

-----Original Message-----
 From: plouis -plouis@nyearibnews.com
 To: Kelly Mobley, Dawn Thomas, Shelley Dalley, George
 Sent: Wed, Oct 10, 17:56:25 2007
 Subject: FW: Carib News - Pre-trip Approval issues

Please see e-mail I received from Ms. Olson of the Committee on Standards of Official Conduct.

A possible response could be: The sponsors contribute to the overall expense of the trip and the general work of the Foundation. As a courtesy, each contributor is given an opportunity to be attached to a part of the program that is being presented. They do not determine the content or the other participants in the Conference.

Please advise us.

Regards and Thanks

Ms. Louis appears to be pre-clearing her response to questions posed by the Standards Committee staff attorney. There is no indication that the staff attorney knew that the answer to her question had already been discussed with the counsel to the then-chair of the Standards Committee. Substantively, based on documents obtained by the OCE and interviews with sponsors, the statement "the sponsors contribute to the overall expense of the trip" appears to be true. However, the statement "and the general work of the Foundation," does not appear to be true. All of the sponsors OCE interviewed stated unequivocally that the contribution was intended for the conference.⁷⁰

⁶⁹ E-mail from Patricia Louis to Dawn Kelly Mobley, George Dalley, and Shelley Thomas (Oct. 10, 2007, 5:56 PM EST) (Exhibit 17 at 09-4403 0187).

⁷⁰ Memorandum of Interview of Representative of IBM (May 8, 2009) (Exhibit 9); Memorandum of Interview of Representative 1 of the Verizon Foundation (Mar. 23, 2009) (Exhibit 11); Memorandum of Interview of Representative of Citi (Mar. 17, 2009) (Exhibit 4); Memorandum of Interview of Representative 1 of Macy's (May 28, 2009) (Exhibit 20).

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78. Less than an hour later Ms. Mobley responded.⁷¹ The Board notes Ms. Mobley's concern with whether any of the corporate sponsors paid for an event and also retained a lobbyist⁷² and her conclusion that if they did, Members of Congress could only attend for one day.

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Wednesday, October 10, 2007 8:49 PM
To: plouis@nycafbnews.com
Subject: Re: Carb News - Pre-hip Approval Issues

Her question centers on whether any of these "co-sponsors" retains a lobbyist or foreign. This is the issue you and I focused on previously. It is a central problem if any do and are paying for the events. If so, you are in the same position as last year with one day events. Call Susan back tomorrow as early as possible. Hopefully, these co-sponsors don't retain lobbyists, but you should have their representations on this matter. At a minimum, Macy's does, right? Alternatively, if they are only sponsoring event tables or the like, a lobbyist will not be problematic.

Sent using BlackBerry


79. Ms. Louis then faxed Ms. Mobley.⁷² The Board notes that Ms. Louis again appears to be pre-clearing her responses to the staff attorney, Ms. Olson, with Ms. Mobley ("Kindly review and advise before I send to Ms. Olson.").

⁷¹ E-mail from Dawn Kelly Mobley to Patricia Louis (Oct. 10, 2007, 6:49 PM EST) (Exhibit 17 at 09-4403 0187).

⁷² Fax from Patricia Louis to Dawn Kelly Mobley (Oct. 11, 2007) (Exhibit 17 at 09-4403 0184).

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THE NEW YORK CARIB NEWS
THE WEEKLY VOICE OF THE CARIBBEAN-AMERICAN COMMUNITY
 7 WEST 36TH STREET, 42 FLOOR, NEW YORK, NY 10018

TEL: (212) 944-1991; FAX: (212) 944-2089
 E-MAIL ADDRESS: NYCARIB@AOL.COM;
 CARIBNEWS@ATT.NET

FACSIMILE TRANSMITTAL SHEET

TO: Dawn Kelly Mobley	FROM: P. Louis <i>[Signature]</i>
COMPANY: Ethics Counsel for Cong. Stephanie Tubbs Jones	DATE: 10/11/07
FAX NUMBER: 202-225-7392	TOTAL NO. OF PAGES INCLUDING COVER:
RE: Travel Form	

URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY YOUR INFORMATION

Further to our conversations of this morning, following is the Travel Certification Form ..

~~The Conference is paid for by the Carib News Foundation. The companies are participants, are not sponsors or co-sponsors for any part of the trip and play no role in the planning or content.~~

The program has been amended to reflect the companies as Participants.

I regret the mis-understanding and thank you for holding my hand as I go through and grow through this process which is new to me.

Kindly review and advise before I send to Ms. Olsen.

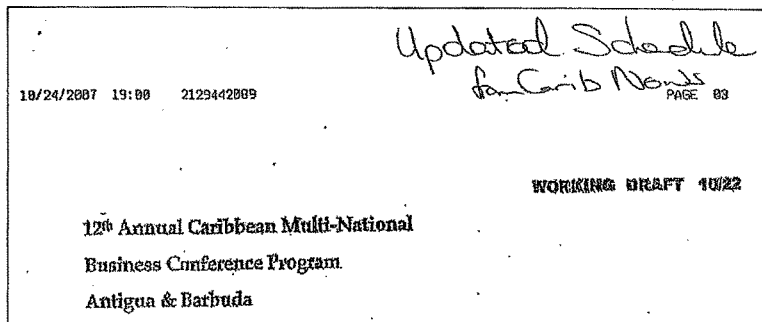
I look forward to hearing from you.

80. The Board further notes that Ms. Louis represented that, "the program has been amended to reflect the companies as Participants," an action taken following Ms. Louis' interactions with Ms. Mobley. A copy of the revised agenda was submitted by another

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Member of Congress who attended the conference.⁷³ The Board notes that this “updated” schedule changed the label applied to “sponsors” to “participants” and in some cases deleted any mention of the corporate entity that had previously been identified as a “sponsor.”



81. This event was previously identified in the earlier draft as being “sponsored” by Preferred Health Partners.⁷⁴ Now it identifies them as merely a “participant.”⁷⁵

<u>PORT & AIRPORT SECURITY - THE MANDATES</u>	
Moderator :	Mr. Lance Ogiste Hon. Bernice Thompson Hon. Dwer Antaphan
Venue	Sandals Grande
Participant	Preferred Health Partners

⁷³ Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 22, 2007) (Exhibit 21 at 09-4403 0243).

⁷⁴ Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 3, 2007) (Exhibit 19 at 09-4403 0226-227).

⁷⁵ Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 22, 2007) (Exhibit 21 at 09-4403 0247).

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82. In another example, the Board notes that the following event was previously identified as being sponsored by CITI.⁷⁶ Now CITI is not even mentioned.⁷⁷ Michael Flanigan, the moderator, was an executive at CITI at the time and represented the company at the conference.⁷⁸

5:00pm - 6:30pm	-	COMMUNITY OUTREACH - <u>EDUCATION & YOUTH DIRECTION - ACCESS AND COLLABORATION</u>
Venue:	-	Multipurpose Cultural & Exhibition Centre
Moderator:	-	Michael Flanigan
Speakers:	-	Dr. Edison Jackson - President Medgar Evers College Hon. David M. Dinkins - Former Mayor New York City Hon. Eddie Bernice Johnson - Member of Congress Hon. Bertrand Joseph

83. These changes were entirely cosmetic. There is no indication that the corporations' substantive role in the conference changed in any way.

84. That same day, October 11, 2007, Ms. Louis responded to Ms. Olson, stating that "[t]he sponsors contribute to the overall expense of the trip."⁷⁹ The Board notes that this is precisely the answer she had pre-cleared with Mobley.

⁷⁶ Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 3, 2007) (Exhibit 19 at 09-4403 0223).

⁷⁷ Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 22, 2007) (Exhibit 20 at 09-4403 0253).

⁷⁸ Memorandum of Interview of Representative of Citi (Mar. 17, 2009) (Exhibit 4 at 09-4403 0060).

⁷⁹ E-mail from Patricia Louis to Susan Olson (Oct. 10, 2007, 10:33 AM EST) (Exhibit 17 at 09-4403 0181).

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From: plouis [mailto:plouis@nycaribnews.com]
 Sent: Thursday, October 11, 2007 10:33 AM
 To: Olson, Susan
 Subject: Re: Carib News - Pre-trip Approval Issues

Ms. Olson,
 In response to your e-mail:
 The sponsors contribute to the overall expense of the trip and the general work of the Foundation.
 As a courtesy, each contributor is given an opportunity to be attached to a part of the program that is being presented. They do not determine the content or the other participants in the Conference.
 No federally registered lobbyist or foreign agent will be accompanying the Members or participating in the program.

Regards

Patricia Loyis
 Executive Assistant
 CARIB NEWS
 7 West 36th Street, 8th Floor
 New York, NY 10018

85. Ms. Olson then forwarded her exchange with Ms. Louis to Bill O'Reilly, the Staff Director and Chief Counsel of the Ethics Committee at that time, and to Dawn Mobley.⁸⁰ Based on this e-mail, it appears that Ms. Olson was unaware that Mobley had been communicating directly with the Carib News Foundation. There is also no evidence that Ms. Mobley told her she had been involved in this manner. Witnesses for the various sponsors told the OCE that they did contribute funding directly to the trip (the conference) and in no case did they simply make donations to the "general funds" of the CARIB NEWS or the Carib News Foundation.⁸¹

⁸⁰ E-mail from Susan Olson to Bill O'Reilly and Dawn Kelly Mobley (Oct. 12, 2007 9:29 AM) (Exhibit 17 at 09-4403 0181-182).

⁸¹ Memorandum of Interview of Representative of IBM (May 8, 2009) (Exhibit 9); Memorandum of Interview of Representative 1 of the Verizon Foundation (Mar. 23, 2009) (Exhibit 11); Memorandum of interview of Representative of Citi (Mar. 17, 2009) (Exhibit 4); Memorandum of Interview of Representative 1 of Macy's (May 28, 2009) (Exhibit 20).

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From: Olson, Susan
 Sent: Friday, October 12, 2007 9:29 AM
 To: O'Reilly, Bill; Kelly Mobley, Dawn
 Subject: FW: Carib News - Pre-trip Approval Issues

Bill and Dawn,
 Please note the following response from Ms. Louis at Carib News: Unfortunately, it appears that if each sponsor contributes funding directly to the trip (an earmark of funds) and not simply to the general funds of Carib News, then the assumption is that all of these entities are co-sponsors of the trip for purposes of the House travel rules. If that is the case and since it is likely that at least one of these co-sponsors hires or retains a federally registered lobbyist, the trip could only be a one-day event trip. Thus the Committee can't approve the trip as it currently exists.

But, if you have a different interpretation of the below information from Ms. Louis, please do let me know. Thanks! Susan.

86. Ms. Mobley then forwarded Ms. Olson's internal e-mail to Ms. Louis.⁸² The Board notes that Ms. Mobley counseled that these "other organizations" can "participate" in the program but "should not help pay for the trip."

From: Kelly Mobley, Dawn
 Sent: Friday, October 12, 2007 9:59 AM
 To: 'pbjls'
 Subject: FW: Confidential

Please read both emails below. Give Susan a call as soon as you work through the kink, let her know you are following up. Please make yourself available to work through this matter today. Thank you Patricia. (These other organizations can participate in the program but should not help pay for the trip).

87. Later that day, Ms. Mobley sent Ms. Louis an additional e-mail.⁸³ As previously stated, the sponsors whom the OCE interviewed all stated that they did not "support [the] foundation annually" and did specifically designate their donations for the 2007 conference. Either Ms. Mobley was repeating inaccurate information Ms. Louis had given her, or she was giving inaccurate information to Ms. Olson without prompting.

⁸² E-mail from Dawn Kelly Mobley to Patricia Louis (Oct. 12, 2007 9:59 AM EST) (Exhibit 17 at 09-4403 0180).

⁸³ E-mail from Dawn Kelly Mobley to Patricia Louis (Oct. 12, 2007 1:55 PM EST) (Exhibit 17 at 09-4403 0180).

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Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Friday, October 12, 2007 1:55 PM
To: plouis
Subject: RE: Confidential

The fax did not come through. I will be stepping out of the office for the remainder of the day, but will be in early Monday. Please follow up again with Susan. I have explained that the organizations you labeled as co-sponsors are not. They support your foundation annually, but have not and will not pay for the Members trip. This is simply a misunderstanding of the terms "sponsor", "contributor", and "participant" as used in the Ethics rules which is why I sent you the Rules book for preparation.

Once you are able to clarify these issues and make sure your itinerary passes too, you should be fine. An Ethics Committee Staff Attorney must review and approve as well. Your Staff Attorney is Susan.

88. Ms. Olson then sent Ms. Louis additional questions about the corporate entities previously identified as "sponsors."⁸⁴

From: Olson, Susan
Sent: Friday, October 12, 2007 2:41 PM
To: plouis
Cc: Kelly Mobley, Dawn; O'Reilly, Bill
Subject: RE: Caribbean News - Pretrip Approval Issues

Ms. Louis,

Please explain in more detail your email message below relative to the "sponsors contribute to the overall expense of the trip." In this regard, do the following entities pay for any of the expenses of the trip for the invited House Members, including roundtrip air transportation costs, lodging costs, meal costs, cost of a particular meal or reception, etc.?

- o Antigua Government
- o Sandals
- o Royal Caribbean Bakery
- o CITI
- o Pfizer
- o Macy's
- o AT&T
- o HSBC
- o IBM

⁸⁴ E-mail from Susan Olson to Patricia Louis (Oct. 12, 2007 2:41 PM EST) (Exhibit 17 at 09-4403 0175-176).

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- o Goodworks International
- o Preferred Health Partners
- o Antigua & Barbuda
- o American Airlines
- o Golden Krust

Susan L. Olson

Counsel

House Committee on Standards of Official Conduct

89. Three days later, Ms. Louis sent an e-mail to Ms. Mobley, but addressed to Ms. Olson.⁸⁵ This may have been inadvertent or, based on their previous practice, Ms. Louis may have done this before she then sent it to Ms. Olson. This is the final communication regarding the 2007 conference provided to the OCE.

From: plouis1@caribnews.com
 Sent: Monday, October 15, 2007 11:00 AM
 To: 'Kelly Mobley, Dawn'
 Subject: RE: Carib News - Pre- trip Approval Issues

Ms. Olson,
 In response to your e-mail, the answer to your question is NO.

Regards and Thanks for your patience.

Patricia Louis
 Executive Assistant
 CARIB NEWS
 7 West 36th Street 8th Floor
 New York, NY 10018

90. In an interview with the OCE, a staff member of Representative Rangel's office, Staff Member 1 of Congressman Rangel's Office, described discussions with Ms. Louis and Ms. Mobley in 2007 on the topic of how the new travel rules would affect the Members' participation in the 2007 conference.⁸⁶ The staff member said that Ms. Louis, and Mr. and Mrs. Rodney told him that the then Chair of the Standards Committee had assigned

⁸⁵ E-mail from Patricia Louis to Dawn Kelly Mobley (Oct. 18, 2007 11:00 AM EST) (Exhibit 17 at 09-4403 0175).

⁸⁶ Memorandum of Interview of Staff Member 1 of Congressman Rangel's Office (May 27-28, 2009) (Exhibit 22 at 09-4403 0257-0258).

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her counsel on the Committee, Ms. Mobley, to “find a way” to allow Members of Congress to participate in the conference under the new travel rules passed by the House in 2007.⁸⁷ The staff member told the OCE that Congressman Rangel told him that the then-Chair had made similar statements to him.

91. Staff Member 1 of Congressman Rangel’s Office said the “framework” that was decided upon was that the Carib News Foundation would raise money from corporate donors who had previously sponsored the conference and that this money in turn would be deposited in a “common fund” that would then be used to pay for the conference. It was Staff Member 1 of Congressman Rangel’s Office’s understanding that if this was done, then Members of Congress could participate in the conference without any restrictions imposed by the new rules. Staff Member 1 of Congressman Rangel’s Office said that it was important to break the link between the corporations and the conference under the new rules and that using the Foundation in this way would enable that to happen. Staff Member 1 of Congressman Rangel’s Office said he learned of this new framework for the conference from Mr. and Mrs. Rodney and that they represented this approach had come from Ms. Mobley on the Standards Committee.
92. This conduct in 2007 is relevant to the present reviews for a number of reasons. First, in and of itself, the intervention of the Chair’s counsel in this matter is troubling and more likely constituted an improper manipulation of the clearance process. Following Ms. Mobley’s intervention, Carib News Foundation changed the Private Sponsor Travel Certification Form to delete any mention of private sponsors before it was sent to the Standards Committee’s staff attorney assigned to review the matter. This occurred after Carib News Foundation had told Ms. Mobley that these corporations were sponsors of the conference on several occasions. Ms. Louis’s initial, and presumably truthful, submissions regarding the conference described the corporate entities as sponsors. However, if the corporations were sponsors of the conference, as opposed to Carib News Foundation, then the Members of Congress ability to attend would have been limited because, the corporations, unlike the Carib News Foundation, employed or retained lobbyists. It appears from the correspondence between Ms. Mobley and Ms. Louis, and Ms. Olson’s apparent ignorance of the correspondence, that Ms. Mobley assisted Ms. Louis in preparing inaccurate answers for Ms. Olson in order to ensure that Ms. Olson would approve the trip in a manner that would not limit the attendance of the Members of Congress. Ms. Mobley’s involvement in the process seems to have prevented the Standards Committee and its staff from correctly performing its responsibilities. Ms. Olson’s approval of the trip was predicated on an incomplete or inaccurate factual record,


⁸⁷ *Id.* at 09-2567 0258.

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in which Ms. Mobley apparently was complicit, putting at risk those Members of Congress who relied on that approval.

93. The 2007 conduct and attendant misrepresentations appear to have directly influenced what occurred in 2008. When the Carib News Foundation submitted materials to the Standards Committee for their approval of the 2008 conference, the Carib News Foundation took the same approach that they had been counseled to take in 2007 and did not disclose the role of the corporate sponsors on the Private Sponsor Travel Certification Form or the conference agenda.
94. In fact, in 2008, Carib News Foundation again first submitted its document to Ms. Mobley.⁸⁸ The Board notes that while Ms. Mobley remains an employee of the U.S. House of Representatives as of the date of this report, the above described conduct did not occur after the day the House passed the resolution creating the OCE, and therefore, under the terms of the that resolution, the OCE does not have jurisdiction to open a preliminary review into Ms. Mobley's conduct.

 THE NEW YORK CARIB NEWS <small>THE WEEKLY VOICE OF THE CARIBBEAN-AMERICAN COMMUNITY 7 WEST 36TH STREET, 24 FLOOR, NEW YORK, NY 10018</small>	
TEL: (212) 944-1991; FAX: (212) 944-2089 E-MAIL ADDRESS: NYCARIB@AOL.COM; CARIBNEWS@ATT.NET	
FACSIMILE TRANSMITTAL SHEET	
TO: Kelly Mobley	FROM: Patricia Louis
COMPANY: Committee on Standards of official conduct	DATE: 8/20/08
FAX NUMBER: 202-225-7392	TOTAL NO. OF PAGES INCLUDING COVER:
RE: 2008 MULTINATIONAL BUSINESS CONFERENCE	
<input type="checkbox"/> URGENT <input type="checkbox"/> FOR REVIEW <input type="checkbox"/> PLEASE COMMENT <input type="checkbox"/> PLEASE REPLY <input type="checkbox"/> YOUR INFORMATION	
Following is the completed form and attachments re travel for Members of Congress to attend the 2008 Multinational Business Conference scheduled for November 6-9, 2008 in St. Maarten.	
Regards	

⁸⁸ Fax from Patricia Louis to Dawn Kelly Mobley (Aug. 20, 2008) (Exhibit 23 at 09-4403 0263).

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IV. The Value of the Trip Reported on the Member's Post-Travel Disclosure Form

95. *Under House Rule 25 clause 5(d), Members are required to obtain prior approval of the Standards Committee for trips where the Member's travel expenses will be reimbursed by a private source. The Standards Committee has adopted regulations, including a pre- and post-travel form Members must complete, pursuant to House Rule 25 clause 5(h)(i)(1)(B)⁸⁹ that requires Members to publicly disclose "trip expenses."*
96. *According to the House Ethics Manual, "[t]he rule and implementing regulations are concerned with the organization(s) or individual(s) that actually pay for travel." House Ethics Manual (2008) at 97.*
97. There is substantial reason to believe that Congressman Payne violated House Rule 25 clause 5(h)(i)(1)(B) by underreporting the value of the travel reimbursements he received to attend the 13th Annual Caribbean Multi-National Business Conference.

A. Representations from Carib News Foundation

98. Carib News Foundation submitted a Private Sponsor Travel Certification Form to each Member it sponsored for the 2008 trip—Representatives Christensen, Kilpatrick, Payne, Rangel and Thompson.⁹⁰ This form was provided to each Member Office and then submitted by the Member Office to the Standards Committee as part of the pre-travel approval process.

⁸⁹ House Rule 25(5)(h)(i)(1)(B) directs the Standards Committee to establish, "regulations describing the information it will require individuals subject to this clause to submit to the committee in order to obtain the prior approval of the committee for any travel covered by this clause . . ." On February 20, 2007, the Committee issued guidelines and regulations concerning the travel restrictions and requirements.

⁹⁰ Private Sponsor Travel Certification Form signed by Karl Rodney (Oct. 3, 2008) (Exhibit 1 at 09-4403 0009).

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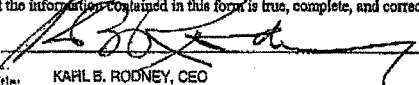
21. **TOTAL EXPENSES FOR EACH PARTICIPANT:**

<input type="checkbox"/> actual amounts <input type="checkbox"/> good faith estimates	Total Transportation Expenses per Participant	Total Lodging Expenses per Participant	Total Meal Expenses per Participant
For each Member, Officer, or employee	410	280	145
For each accompanying family member	410	0	145

	Other Expenses (dollar amount)	Identify Specific Nature of "Other" Expenses (e.g., taxi, parking, registration fee, etc.)
For each Member, Officer, or employee	\$150	Conference Registration
For each accompanying family member	\$ 25	Local transportation

22. I represent that reimbursement for miscellaneous travel expenses for the trip, such as travel to and from airports, security costs, interpreter fees, visa application fees, and similar expenses, will be for actual costs incurred and are necessary for the purpose of the trip (signify "yes" by checking box):

23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: 

Name and title: KARL E. RODNEY, CEO

Organization: CARIB NEWS FOUNDATION

99. The Board notes that the Carib News Foundation provided the same exact dollar figure with very minor variations for each Member of Congress that attended the conference despite the fact that Carib News Foundation recognized on the same form that the Congressional travelers were travelling to and from different cities. In fact, the Congressional travelers came from St. Croix, U.S. Virgin Islands; Detroit, Michigan; Newark, New Jersey; New York, New York; and Jackson, Mississippi.

100. In addition, according to Mr. Rodney, the cost charged to "the public" to attend the conference for four days and three nights was \$840 for double occupancy or \$1085 for single occupancy.⁹¹ The cost of attendance included "room accommodations, meals, and admission to the Conference."⁹² However, these figures were not disclosed pre-travel to

⁹¹ Letter from Joel Cohen, Counsel for Karl Rodney (May 18, 2009) (Exhibit 6 at 09-4403 0076-77).

⁹² *Id.*

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the Members or the Standards Committee, nor were these figures disclosed to the Members after the conference.

B. Information Required from the Congressional Traveler

101. On his Member/Officer Post-Travel Disclosure Form,⁹³ Representative Payne certified his travel cost as the following:

TRIP EXPENSES:			
	Total Transportation Expenses	Total Lodging Expenses	Total Meal Expenses
For Member or Officer:	\$410.00	\$405.00	
For accompanying family member:			
	Other Expenses (dollar amount)	Specific Nature of Expenses (e.g., taxi, parking, registration fee, etc.)	
For Member or Officer:		\$175.00	
For accompanying family member:			

I certify that the information contained in this form is true, complete, and correct to the best of my knowledge. I have determined that all of the expenses listed above were necessary and that the travel was in connection with my duties as a Member or Officer of the U.S. House of Representatives and would not create the appearance that I am using public office for private gain.

SIGNATURE OF MEMBER OR OFFICER: Donald Payne

DATE: Nov. 19, 2008

102. In his interview, Congressman Payne stated that he did not see any documented dollar amounts for the registration fee or for the cost of meals. He thought the pre-travel form contained that information. He also stated that he does not handle the paperwork for his travel and he did not review the post-travel report for this trip. His staff handles all aspects of travel for him.⁹⁴



⁹³ Member/Officer Post-Travel Disclosure Form signed by Representative Donald Payne (Nov. 19, 2008) (Exhibit at 09-4403 0003).

⁹⁴ Memorandum of Interview of Representative Donald Payne (May 12, 2009) (Exhibit 2 at 09-4403 0030).

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103. Documents obtained from Mr. Rodney and Mr. Payne indicate his transportation costs were slightly higher than those reported.⁹⁵ While the difference between the reported and actual cost is *de minimis*, the amount that was reported was, nevertheless, inaccurate.

Continental Airlines				Confirmation: Print your boarding pass at AK13X5 within 24 hours of your flight
Issue Date: October 23, 2008				
Traveler PAYNE/DONALDMR	eTicket Number 0052179750461	Frequent Flyer	Seats 19F/16F	
FLIGHT INFORMATION				
Day, Date	Flight Class	Departure City and Time	Arrival City and Time	Aircraft Meal
Thu, 06NOV08	CO861 I	NEWARK EWR (EWR) 7:48AM	ST MAARTEN AN (SXM) 12:48PM	737-700 Snack
Tue, 11NOV08	CO860 I	ST MAARTEN AN (SXM) 1:40PM	NEWARK EWR (EWR) 5:20PM	737-700 Snack
FARE INFORMATION				
Fare Breakdown				
Airfare:	318.00USD	Form of Payment:	AMERICAN EXPRESS	
Per Person Total:	412.15USD		Last Four Digits 9426	
eTicket Total:	412.15USD			
The airfare you paid on this itinerary totals: 318.00 USD				
The taxes you paid on this itinerary total: 94.15 USD				

V. Carib News Foundation, as a Private Foundation, Was Prohibited From Paying for Congressman Payne's Travel

104. The Carib News Foundation is identified as the "sponsor" of this conference on at least three forms filed with the Committee on Standards of Official Conduct: (1) the "Private Sponsor Travel Certification Form,"; (2) the "Privately Sponsored Travel: Travel Form," and; (3) the "Member/Officer Post-Travel Disclosure Form."⁹⁶
105. According to a query of the New York State's Office of the Secretary of State, Mr. Rodney appears to operate two organizations – the "Carib News, Inc" which operates a newspaper and the "Carib News Charities, Inc" which also may operate under the name "Carib News Foundation." The OCE has not been able to identify any additional activity, other than the annual Caribbean Multi-National Business Conference, in which the latter organization is involved. Furthermore, while "Carib News Charities, Inc" / "Carib News Foundation" is listed with New York's Office of the Secretary of State as a domestic not-for-profit corporation, it is not listed, as required by law, with the New York State

⁹⁵ Flight Reservation for Representative Donald Payne (Oct. 23, 2008) (Exhibit 24 at 09-4403 0287).

⁹⁶ Member/Officer Post-Travel Disclosure Form signed by Representative Donald Payne (Nov. 19, 2008) (Exhibit 1).

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Charities Bureau. In addition, there is no evidence that the organization has filed a tax return with the IRS, under either name, since 2005.⁹⁷ According to Publication 78 of the IRS, a list of all charities claiming 501(c) status, Carib Charities, Inc is a private foundation.⁹⁸

106. Every organization that qualifies for tax exemption described in section 501(c)(3) of the Internal Revenue Code is defined as a private foundation unless the organization falls into one of the categories specifically excluded from the definition under section 509(a).⁹⁹ In effect, the definition divides 501(c)(3) organizations into two classes: private foundations and public charities. Private foundations are generally funded through a single donor, family or corporation and operate through investment income; whereas, public charities are typically funded and operated through diversified support from governmental sources and the general public.

107. There are several restrictions that are placed on private foundations. At issue here is the restriction on “self-dealing” between a disqualified person (the definition of which includes Members of Congress) and a private foundation.¹⁰⁰ The Code defines the act of “self-dealing” to include any direct or indirect agreement to make any payment of money (including reimbursement of expenses) or other property by a private foundation to a government official.¹⁰¹ Although framed as a tax provision, the statute essentially bars certain federal employees and federally elected officials from receiving compensation, including reimbursements for international travel, from a private foundation.¹⁰²

108. As such, it appears that the Carib News Foundation’s payment of travel expenses for Representative Payne and his acceptance of payment potentially violated the Internal Revenue Code.

109. The Board infers from the fact that the Standards Committee approved the reimbursement that the Standards Committee is unaware of this restriction. The Board notes, however,

⁹⁷ Letter from IRS to OCE (Apr. 17, 2009) (Exhibit 8 at 09-4403 0102-0115).

⁹⁸ Online Version of Publication 78 (Accessed online on June 5, 2009 at <http://www.irs.gov/app/pub-78/>) (Exhibit 8 at 09-4403 0115.1-0115.2).

⁹⁹ 26 U.S.C. §§ 501 and 509.

¹⁰⁰ 26 U.S.C. §§ 4941 and 4946.

¹⁰¹ 26 U.S.C. § 4941(d)(1)(F). The Code imposes a tax (currently 10 percent of the amount involved) on the illegal payments, with later penalties (up to \$20,000 per act of self-dealing) for failure to pay back the foundation. The tax is imposed on the disqualified person, including a government official if the official participates in the act of self-dealing knowingly.

¹⁰² The payment or reimbursement of travel expenses for travel solely from one point in the United States to another point in the United States is excepted from the definition of self-dealing provided that the payment or reimbursement does not exceed the actual cost of the transportation involved and provided the amount for all other traveling expenses does not exceed 125 percent of the maximum amount payable under section 5702 of title 5, United States Code, for like travel by employees of the United States. 26 U.S.C. § 4941(d)(2)(G)(vii).

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that its own research revealed that numerous other ethics-related entities in the federal government are aware of this restriction, and have for some time been enforcing it.¹⁰³

110. Congressman Payne told the OCE that he was unaware of any limitations on the ability of private foundations to pay for overseas travel by government officials.¹⁰⁴
111. The Board notes that these facts show failures at multiple points by multiple parties in complying with and enforcing the travel rules. Inaccurate information was provided by the Carib News Foundation to Members and the Standards Committee. Congressman Payne certified inaccurate information to the Standards Committee. The counsel to the former Chair of the Standards Committee intervened in the review process in a way that both frustrated the process in 2007 and set a pattern of obfuscation that continued in 2008. Finally, the Standards Committee appears unaware of limitations on the ability of private foundations to pay for overseas travel by Members.
112. For all these reasons, the Board concludes further review of this matter by the Standards Committee is appropriate.

¹⁰³ Memorandum from Ethics Counsel at the National Institutes of Health to Deputy Ethics Counsels at NIH (Jun. 2, 2000) (Exhibit 23 at 09-4403 0289-291).

¹⁰⁴ Memorandum of Interview of Representative Donald Payne (May 12, 2009) (Exhibit 2 at 09-4403 0031).

EXHIBIT 1

LEGISLATIVE RESOURCE CENTER
2009 NOV 19 PM 3:39
U.S. HOUSE OF REPRESENTATIVES

Original Amendment

U.S. House of Representatives
110th Congress

MEMBER / OFFICER
POST-TRAVEL DISCLOSURE FORM

This form is for disclosing the receipt of travel expenses from a private source for meetings, speaking engagements, fact-finding trips or similar events in connection with official duties. You need not disclose government-funded or political travel on this form, or travel that is unrelated to official duties. This form does not eliminate the need to report all privately-funded travel on the Member or officer's annual Financial Disclosure Statement. In accordance with clause 5 of House Rule 25, complete this form and file it with the Clerk of the House of Representatives, B-106 Cannon House Office Building, within 15 days after travel is completed. The Clerk is to make these forms available to the public as soon as possible after they are received. Obtain the dollar amounts from the sponsor; if exact dollar amounts are unavailable, provide a good faith estimate.

Name of Member or Officer (print or type): Donald Payne

Name of Accompanying Family Member (if any): N/A

Relationship to Member/Officer (check one): Spouse Child Other (specify): _____

Date of Departure and Date of Return: Nov. 6-11, 2008

Dates at personal expense: Nov. 10-11, 2008

Itinerary (Cities of departure - destination - return): Newark, NJ - St. Maarten, Newark, NJ

Sponsor (Who paid for the trip): Carib News Foundation

Describe meetings and events attended (attach additional pages if necessary): See attached.

Attached to this form are ALL of the following (signify "yes" for each item by checking the corresponding box):

- 1. the Private Sponsor Travel Certification Form completed by trip sponsor, including all attachments
- 2. the Privately-Sponsored Travel Approval Form completed by the Member or Officer; and
- 3. the Committee on Standards' letter approving participation on this trip.

I represent that I participated in each of the activities reflected in the sponsor's agenda (signify "yes" by checking box):

If not, explain: _____

PAYNE

TRIP EXPENSES:

	Total Transportation Expenses	Total Lodging Expenses	Total Meal Expenses
For Member or Officer:	\$410.00	\$405.00	
For accompanying family member:			

	Other Expenses (dollar amount)	Specific Nature of Expenses (e.g., taxi, parking, registration fee, etc.)
For Member or Officer:		\$115.00
For accompanying family member:		

I certify that the information contained in this form is true, complete, and correct to the best of my knowledge. I have determined that all of the expenses listed above were necessary and that the travel was in connection with my duties as a Member or Officer of the U.S. House of Representatives and would not create the appearance that I am using public office for private gain.

SIGNATURE OF MEMBER OR OFFICER: Donald Payne

DATE: Nov. 19, 2008

Version date 3/2007 by Committee on Standards of Official Conduct

LEGISLATIVE RESOURCE CENTER
 2008 NOV 19 PM 3:40
 U.S. HOUSE OF REPRESENTATIVES

U.S. House of Representatives

COMMITTEE ON STANDARDS OF
OFFICIAL CONDUCT
Washington, DC 20515

October 16, 2008

The Honorable Donald M. Payne
U.S. House of Representatives
2209 Rayburn House Office Building
Washington, DC 20515

Dear Colleague:

Pursuant to House Rule 25, clause 5(d)(2), the Committee on Standards of Official Conduct hereby approves your proposed trip to St. Maarten, N.A. scheduled for November 6 to 11, 2008 sponsored by the Carib News Foundation. We note that this trip includes 2 days at your personal expense.

You must complete a Member Travel Disclosure Form and file it with the Clerk of the House within 15 days after your return from travel. As part of that filing, you are required to attach a copy of this letter and the Private Sponsor Travel Certification Form, including attachments. You must also report all travel expenses totaling more than \$335 from a single source on Schedule VII of your annual Financial Disclosure Statement.

Because the trip may involve meetings with foreign government representatives, we note that House Members may accept, under the Foreign Gifts and Decorations Act, gifts "of minimal value [currently \$335] tendered as a souvenir or mark of courtesy" by a foreign government. Any tangible gifts valued in excess of \$335 received from a foreign government must, within 60 days of acceptance, be disclosed on a Form for Disclosing Gifts from Foreign Governments and either turned over to the Clerk of the House, or, with the written approval of the Committee, retained for official use.

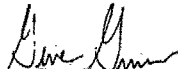
However, we would note that since this trip is scheduled to commence after the general election on November 4, 2008 and because officially-connected travel must be related to official duties, it may be questionable whether a Member who was not reelected in the general election should to accept an invitation for a trip that is fact-finding in nature. Arguably, as of that time, the official responsibilities that may justify the acceptance of travel expenses for such a purpose will have come to an end. This consideration generally will not limit the Committee's authority to approve travel of a departing Member to participate substantially in an officially-related event (for example, to give a speech). Please keep this guidance in mind, as you may need to reevaluate your ability to participate in the trip following the election.

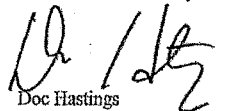
09-4403 0004

The Honorable Donald M. Payne
October 16, 2008
Page 2

If you have any further questions, please contact the Committee's Office of Advice and Education at extension 5-7103.

Sincerely,


Gene Green
Acting Chairman


Doc Hastings
Ranking Republican Member

GG/DH:pgp

U.S. House of Representatives
Committee on Standards of Official Conduct

PRIVATELY SPONSORED TRAVEL; TRAVELER FORM
For Members, Officers and Employees
(submit directly to the Committee)

This form should be completed by House Members, officers or employees seeking Committee approval of privately-sponsored travel or reimbursement for travel under House Rule XXV, clause 5. The completed form should be submitted directly to the Committee by each invited House Member, officer or employee, together with the completed and signed Private Sponsor Travel Certification Form.

Members, officers and employees seeking approval for travel are urged to submit all forms to the Committee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the invitee not receiving approval for the trip. A copy of this form will be made available for public inspection. Please type form. Form (and any attachments) may be faxed to the Committee at (202) 225-7392.

1. Name of Member, officer or employee (traveler): Donald M Payne
2. Sponsor(s) (who will be paying for the trip): Carib News Foundation
3. Travel destination(s): Newark, NJ - St. Maarten, Newark, NJ
4. a. Dates of travel: Nov. 6-11, 2008
 b. Will you be extending the trip at your personal expense? Yes No
 If yes, dates at personal expense: Nov. 10-11, 2008
5. a. Name of accompanying family member (if any): -
 b. Relationship to Member/Officer: Spouse Child Other (specify): _____
6. a. Did the trip sponsor answer "yes" to Question 9(c) on the Trip Sponsor form (i.e., the travel is being sponsored by an entity that employs a lobbyist)? Yes No
 b. If yes, check one of the following:
 (1) Approval for one-night's lodging and meals is being requested: or
 (2) Approval for two-nights' lodging and meals is being requested:
 If "(2)" is checked, explain why the second night is warranted: _____
7. Private Sponsor Travel Certification Form is attached, including agenda, invitee list, and any other attachments (indicate that form is attached by checking box):

U.S. House of Representatives
Committee on Standards of Official Conduct

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM
(provide directly to each House invitee)

This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers or employees under House Rule XXV, clause 5. A completed copy of the form (and any attachments) should be provided to each invited House Member, officer or employee, who will then forward it to the Committee. The trip sponsor should NOT submit the form directly to the Committee.

Private sponsors are urged to submit this form to each House invitee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the invitee not receiving approval for the trip. The submission of an incomplete form will delay the review process. Before completing this form, sponsors are urged to carefully review the Committee's private travel guidelines and advisory memoranda detailing the rules and restrictions for private travel, as well as the instructions for completing this form. Sponsors should call the Committee with any questions prior to submitting the form. Please type form.

1. Sponsor(s) (who will be paying for the trip): CARIB NEWS FOUNDATION
2. I represent that the trip will not be financed (in whole or in part) by a federally-registered lobbyist or a registered foreign agent (signify "yes" by checking box):
3. I represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip (signify "yes" by checking box):
4. Is travel being offered to an accompanying family member of the House invitee(s)? Yes No
5. Provide names and titles of ALL House invitees; for each invitee, provide explanation of why the individual was invited (include additional pages if necessary): BASED ON COMMITTEE OR SUB-COMMITTEE WHICH IMPACTS US/CARIBBEAN RELATIONS ON WHICH THE MEMBER SERVES.
6. Dates of travel: NOVEMBER 6-8, 2008
7. Cities of departure -- destination -- return: VARIES - DEPENDING ON MEMBER
8. Attached is a detailed agenda of the activities taking place during the travel (i.e., an hourly description of planned activities) (signify "yes" by checking box):
9. I represent that (check one of the following):
 - a. The sponsor of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965: or
 - b. The sponsor of the trip does not retain or employ a federally registered lobbyist or registered foreign agent: or
 - c. The trip is for attendance at a one-day event and lobbyist involvement in planning, organizing, requesting, or arranging the trip was *de minimis* under the Committee's travel regulations.
10. If travel is for participation in a one-day event (i.e., if you checked Question 9(c)), check one of the following:
 - a. One-night's lodging and meals are being offered: or
 - b. Two-nights' lodging and meals are being offered:
 If "b" is checked, explain why the second night is warranted: _____

11. If the trip is not sponsored by an institution of higher education, I represent that a federally-registered lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip (signify "yes" by checking box):

12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip: CARIB NEWS FOUNDATION (* SEE ATTACHED)

13. Describe each sponsor's organizational interest in the purpose of the trip: THE INTEREST OF CARIB NEWS FOUNDATION IS TO PROMOTE, INFORM, TRADE AND ESTABLISHMENT OF MEANINGFUL CONNECTIONS BETWEEN THE U.S AND THE CARIBBEAN

14. Describe the type and class of the transportation being provided. Indicate whether coach, business-class or first-class transportation will be provided. In addition, for travel via aircraft, please indicate if travel is being offered on a commercial flight, chartered flight or on an aircraft operated or paid for by a carrier not licensed by the Federal Aviation Administration to operate for compensation or hire (i.e., a private aircraft). If first-class fare is being provided, or if travel is via chartered or private aircraft, please provide an explanation describing why such travel is warranted: REGULAR SCHEDULED AIR SERVICE, ECONOMY CLASS

15. I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s). (signify "yes" by checking box):

16. I represent that either (check one of the following):
a. The trip involves an event that is arranged or organized without regard to congressional participation and that meals provided to congressional participants are similar to those provided to or purchased by other event attendees:
b. The trip involves events that are arranged or organized specifically with regard to congressional participation:
If "b" is checked, detail the cost per day of meals (approximate cost may be provided): _____

17. Reason for selecting the location of the event or trip: SEE ATTACHED

18. Name of hotel or other lodging facility: SONESTA MAHO BEACH RESORT 800-766-3762

19. Cost per night of hotel or other lodging facility (approximate cost may be provided): \$110.00

20. Reason(s) for selecting hotel or other lodging facility: HAS APPROPRIATE MEETING ROOMS

21. TOTAL EXPENSES FOR EACH PARTICIPANT:

<input type="checkbox"/> actual amounts <input type="checkbox"/> good faith estimates	Total Transportation Expenses per Participant	Total Lodging Expenses per Participant	Total Meal Expenses per Participant
For each Member, Officer, or employee	410	280	145
For each accompanying family member	410	0	145

	Other Expenses (dollar amount)	Identify Specific Nature of "Other" Expenses (e.g., taxi, parking, registration fee, etc.)
For each Member, Officer, or employee	\$150	Conference Registration
For each accompanying family member	\$ 25	Local transportation

22. I represent that reimbursement for miscellaneous travel expenses for the trip, such as travel to and from airports, security costs, interpreter fees, visa application fees, and similar expenses, will be for actual costs incurred and are necessary for the purposes of the trip (signify "yes" by checking box):

23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: 

Name and title: KARL E. RODNEY, CEO

Organization: CARIB NEWS FOUNDATION

Address: 7 WEST 38th STREET, 8th FLOOR, NEW YORK, NY 10018

Telephone number: (212) 944-1991

Fax number: (212) 944-2089

Email Address: CARIB-DESK@ATT.NET

The Committee staff may contact the above individual above if additional information is required.

If there are any questions regarding this form please contact the Committee at the following address:

Committee on Standards of Official Conduct
 U.S. House of Representatives
 HT-2, The Capitol
 Washington, DC 20515
 (202) 225-7103 (phone)
 (202) 225-7392 (general fax)
 (202) 226-7172 (fax for travel approvals)

Version date 6/2007 by Committee on Standards of Official Conduct

**MEMBERS OF CONGRESS INVITED TO THE
THIRTEENTH ANNUAL MULTI-NATIONAL BUSINESS
CONFERENCE, NOVEMBER 6-9, 2008, ST. MAARTEN, N.A.**

Congresswoman Diane E. Watson
Congressman David Scott
Congressman James Clyburn
Congresswoman Nydia Velazquez
Congressman Charles Rangel
Congressman Donald Payne
Congresswoman Donna M. Christensen
Congressman Edolphus Towns
Congressman G. K. Butterfield
XCongressman Gregory Meeks
Congressman Jesse Jackson Jr.
Congressman Keith Ellison
Congressman Kendrick Meek
Congresswoman Maxine Waters
Congressman Melvin Watt
Congressman Robert Scott
Congressman William Lacy Clay
Congresswoman Barbara Lee
Congresswoman Caroline Cheeks Kilpatrick
Congresswoman Corrine Brown
Congresswoman Eddie Bernice Johnson
Congresswoman Sheila Jackson Lee
Congresswoman Yvette Clarke
Congressman Danny Davis
Congressman Bennie Thompson
Congresswoman Laura Richardson

July 2008

09-4403 0010



Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10017
Tel: (212) 944-1991; Fax: (212) 944-2084
E-mail: info@caribnewsconference.com

Item #12

CARIB NEWS FOUNDATION is organized to provide education and information about the Caribbean in the area of Business, Education, Health and Culture, Promote Good neighborly within the United States and the hemisphere.

The participants are selected to participate in the various workshops during the Conference based on their demonstrated interest, expertise and assignment in the United States Congress.

Item #17

A Caribbean country whose proximity to other Caribbean Countries makes it conveniently located for delegates from the other Caribbean countries to attend.

Organized by Carib News Foundation. A non-profit project 501-C3 corporation

Working Copy

13th Annual Caribbean Multi-National
Business Conference Program
St. Maarten, N.A.

THEME: **A REGION IN TRANSITION – STRATEGY FOR
CHANGE – BUILDING ALLIANCES**

Thursday, November 6, 2008

12:00noon– 6:00pm : CONFERENCE REGISTRATION-

5:00 – 6:30 - TOWN HALL FORUM - HEALTH

Innovative Solutions for Life styles
Diseases- a Collaborative Approach – Diabetes,
Hypertension, Obesity, Oral Health

Speakers - Dr. Denzil Douglas – Prime Minister, St. Kitts and Nevis
Mrs. Karen Boykin-Towns
Hon Diane Watson, Member of US Congress
Health Commissioner, St. Maarten
Hon. Jesse Jackson Jr., Member of US Congress

6:30- 7:30pm - OPENING RECEPTION

Venue: - POOLSIDE

Theme: - A REGION IN TRANSITION -

Speakers: - Faye A. Rodney

Hon. Roy Marlin – Commissioner for Tourism & Finance – St
Maarten.

Hon. Yvette Clarke, Member of Congress

MC: - Sabrina Hosang - Royal Caribbean Bakery

7:30 - 9:30 pm - OPENING DINNER

Venue: - Main Ballroom

Theme: - STRATEGY FOR CHANGE

Greetings:

Speakers: - Dame Billie Miller

Hon. Donald Payne, Member US Congress

Hon. Nick Perry, New York State Assembly

Hon. G.K. Butterfield, Member of Congress

10:00pm - 1:00am: - HOSPITALITY AREA

Friday, November 7, 2008

8:00am - 8:45am - (BREAKFAST)

9:00am - 6:00pm CONFERENCE REGISTRATION

9:00am - 10:15am - OPENING CEREMONIES

Venue: - Main Ballroom

Theme: - BUILDING ALLIANCES FOR PROGRESS

- Invocation:** - **Rev. Susan Johnson=Cook**

- Anthems:** - **St. Maarten**
Lift Every Voice

- Remarks:** - **Eric Eve**
Karen Boykin-Towns
Marie Long
Ed Goldberg
Patrick Gaston
Hazel Dukes

- Speakers:** - **Hon. Carolyn Cheeks Kilpatrick – Member**
US Congress
Hon. Melvin Watt, Member of US Congress
Commissioner Sarah Wescot-Williams, Leader
of Government, St.Maarten

- Keynote Speaker** - **Hon. Charles Rangel –Member US Congress**

RIBBON CUTTING CEREMONIES

10:15am – 10:30am - COFFEE BREAK -

10:30am -11:45am - PRESENTATION

- Theme:** "Health – an Economic development Strategy
For the Region"
- Speakers:** - Hon. Donna Christensen, Member US Congress
Hon. Barbara Lee, Member US Congress
Dr. Carl Kenel-Pierre, Preferred Health Partners
Dr. Denzil Douglas, Prime Minister St.Kitts/Nevis
Hon. Yvonne Graham
- 10:30 – 11.45** - **PRESENTATION**
- Theme** - "Access to Capital – Creative and unique
Financial packages "
- Speakers** - Michele Chow Tai, HSBC Bank
Hon. Adolfo Carrion, Bronx Borough President
William Lacy Clay, Member of US Congress
Hon. Compton Bourne, President, CDE
Commissioner of Finance, St. Maarten
Hon. Keith Ellison, Member US Congress
- 12:00noon – 1:15pm** - **PRESENTATION**
- Theme:** - **TRAVEL & TOURISM –**
Need for a Competitive Transportation Network
Emerging Tourism Market
Health Tourism

Greeting: - Dale Morris

Speakers: - Hon. Gregory Meeks, Member of US Congress
 Hon. Allan Chastanet, Minister of Tourism, St. Lucia
 Hon. Roy Marlin, Commissioner of Tourism,
 St. Maarten
 Hon. Bennie Thompson, Member of US Congress

12:00noon -1:15pm **PRESENTATION**

Theme - Technological Innovation - A Path to Economic
 Development

Moderator - Colin Ward

Speakers Hon. Edolphus Towns, Member of US Congress
 Hon. Eddie Bernice Johnson, Member US Congress
 Commissioner of Technology, St. Maarten

1:30pm - 2:30pm - **LUNCHEON**

Venue: - Main Ballroom

Theme: - **BUILDING A WINNING STRATEGY - PARTNERSHIPS
 THAT WORK**

Speakers: - Hon. Nick Perry, NYS Assembly
 Eric Eve
 Hon. Jesse Jackson, Member US Congress

Keynote Speaker - Hon. David Paterson, Governor New York State

3:00pm - 4:00pm

**Round Table #1 - NEXT GENERATION --
Business Retention and Expansion**

Speakers -

- Sabrina HoSang
- Lita Balram
- Karlisa Rodney
- Hon. Yvette Clarke, Member of US Congress
- Hon. Kendrick Meek, Member of US Congress

**Round Table #2 - LOCAL BUSINESS INITIATIVES --
Opportunities with US Companies**

Speakers :

- Ed Goldberg
- Eric Eve
- Cheryl Monroe
- Albert Brown
- Member of Congress

**Round Table #3 - HEALTH -
QUALITY HEALTH CARE
HIV/AIDS Programs in the Region**

4:30pm - 6:00pm - TOWN HALL FORUM - EDUCATION

Speakers: - **Dr. Edison O. Jackson**
Dr. Marcia Keizs
Patrick Gaston
Hon. Sarah Wescot-Williams, Commissioner of Education, St. Maarten
Hon. Danny Davis, Member of US Congress
Professor Rex Nettleford, UWI

Venue:

6:30:00pm - 7:30pm - HOST COUNTRY EVENING

Venue:

Theme

MC:

Speakers:

7:30 - 8:00 pm:

8:00pm - 10:30 pm.

Venue :

Theme

CULTURAL PRESENTATION

Speakers: **Hon. David Scott, Member of US Congress**

10:00pm - 1:00am - HOSPITALITY AREA

Venue:**Saturday, November 8, 2008**

**8:00am – 10:00am - WOMEN'S BREAKFAST
WOMEN OF INFLUENCE AND POWER**

Venue: - Main Ballroom

Moderator - Marilyn Johnson

**Speakers: - Hon. Maxine Waters, Member US Congress
Hon. Sheila Jackson-Lee, Member US Congress
Hon. Barbara Lee, Member US Congress
Brenda Scott
Hon. Sarah Wescot-Williams
Rev. Dr. Susan Johnson-Cook**

**10:15am – 11:45am - PRESENTATION – EDUCATION
A Collaboration with US Institution *ThinkUnity*
UWI/Medgar Evers College Initiatives**

**Speakers: Dr. Edison Jackson
Patrick Gaston
Hon. Yvette Clarke, Member US Congress
Hon. Danny Davis, Member of Congress**

10:15am - 11:45am - **PRESENTATION - AGRICULTURE**
A New Emphasis in the Region - Can it Survive Globalization.

Chair & Greetings:

Speakers: Hon. David Scott, Member US Congress
 Hon. Gregory Meeks, Member US Congress

11:00am - 1:00pm All Members of Congress are requested to attend
**Closed Door Meeting with Prime Ministers,
 Ministers of Government of the Caribbean,
 Commissioners, to review US/Caribbean Relations**

12:00noon - 1:15pm - **PRESENTATION - CREATIVE FINANCIAL SOLUTIONS
 TRADE & INVESTMENT**
 Retooling for Growth
 Community Capitalism

Speakers: - Hon. Maxine Waters, Member US Congress

Panelists:

12:00 noon - 1:15pm - **PRESENTATION**
**Theme Hemispheric Security - Ports/Airports -
 Crime - Drugs - Disaster**

Speakers

- Hon. Bennie Thompson, Member of US Congress
- Theo Heyliger – Commissioner of Ports, St. Maarten
- Hon. Yvette Clarke – Member US Congress
- Hon. Lance Ogiste, Brooklyn District Attorney
- Dr. Basil Wilson
- Hon. Keith Ellison, Member of US Congress

1:30pm – 2:30 pm LUNCHEON

Theme: **CARIBBEAN – A SOLID INVESTMENT**

Speakers

- Hon. Charles Ranel, Member of US Congress
- Hon. William Thompson, NYC Comptroller
- Dr. Compton Bourne, President CDB
- Dr Enrique Riggs
- Javier Evans

Round Table #1 - **EDUCATION**

Speakers

- Hon. Danny Davis, Member of US Congress
- Hon. Eddie Bernice Johnson, Member US Congress

Round Table#2: - **IMMIGRATION**
 Hon. Sheila Jackson-Lee, Member of US Congress
 Dr. Marco Mason

Round Table#3: - **HAITI - HOPE II - Diaspora Initiatives**
 Hon. Charles Rangel, Member of US Congress
 Hon. Kendrick Meek, Member of US Congress

Round Table# 4 - **MICRO FINANCING - CONFERENCE GENERATED**
 Laura Blackburne
 Hon. Keith Ellison, Member of US Congress
 Lucille McEwen
 Michael Flanigan

4:30 pm - 6:00pm - **TOWN HALL FORUM - TECHNOLOGY**

Venue:

Speakers - Marie Long
 Marilyn Johnson
 Colin Ward
 Al Brown

Hon. Corrine Brown, Member of Congress
Hon. James Clyburn, Member of Congress
Commissioner on Technology

6:30 - 7:30pm - GALA RECEPTION

Speakers - Hon. James Clyburn, Member of US. Congress

7:30pm - 10:00pm - GALA DINNER & AWARDS PRESENTATION

Speaker - Hon. Charles Rangel, Member of US Congress
Hon. Sarah Wescot-Williams, Leader of Government
Business

AWARDS PRESENTATION

ENTERTAINMENT

10:30pm - 1:00am - HOSPITALITY AREA

Venue:

Sunday, November 9, 2008

8:30 am - 10:00am - POWER BREAKFAST

Theme: - ***SPIRITUALITY - THE BASICS IN BUSINESS***

Speakers - **Rev. Susan Johnson Cook**
Ed Goldberg
Lowell Hawthorne

Selection: - **Local Choir**

September 30, 2008

- CARIBBEAN'S INC

CARIBBEAN MULTINATIONAL BUSINESS CONFERENCE

[View 2007 A]

REGISTER AGENDA ABOUT THE CONFERENCE HOTEL FAQ PARTICIPANTS PRESS CONTACT I

The 2008 Program Agenda

[View 2007 A]

Theme : A Region In Transition - Strategy For Change - Building Alliances

THURSDAY NOVEMBER 6TH 2008

13TH ANNUAL CARIBBEAN MULTI NATIONAL BUSINESS CONFERENCE REGISTRATION
Time - 12:00 Noon to 6:00 PM

TOWN HALL FORUM - HEALTH
Time - 5:00 PM to 6:30 PM

- Healthy Living - 'The Worldwide Challenge'
- Innovative Solutions For Life Styles
- Diseases - A Collaborative Approach - Diabetes, Hypertension, Obesity, Oral Health

Venue - Royal Islander
Moderator - Dr. Marcia Bayne Smith

Speakers - Mrs. Karen Boykin-Towns, Congress Member Dr. Donna Christian Christensen, Commissioner Marla Buncamper Molanus, Health Commissioner, St Maarten, Dr. John Palmer, Harlem Hospital Center Dr. Jay Cowan, National Medical Association, Dr. Leon Merrick - Merrick's Dental Studio, First Lady Michelle Palga Paterson, Health Advocate

MULTI-NATIONAL BUSINESS CONFERENCE OPENING RECEPTION
Time - 6:30 PM to 7:30 PM
Venue - Upper Pool

Theme - A Region In Transition

MC - Sabrina Hosang - Royal Caribbean Bakery

Speakers - Faye A. Rodney, Hon. Roy Marlin - Commissioner For Tourism & Finance Of St Maarten

MULTI-NATIONAL BUSINESS CONFERENCE OPENING DINNER
Time - 7:30 PM to 9:30 PM
Venue - The Maho Room

Theme - A Strategy For Change

http://www.caribnewsconference.com/conference_05/agenda.html

10/28/2008

09-4403 0025

Greeting - Karen Boykin Towns
 Speakers - Dr. Denzil Douglas, Dr. Carl Kenel Pierre, Commissioner Maria Buncamper Molanus, Health Commissioner of St Maarten, Dr Dexter McKenzie

LUNCHEON

Time - 1:30 PM to 2:30 PM
 Venue - Main Ballroom

Theme - Building A Winning Strategy - Partnerships That Works

Moderator - Hon. Nick Perry, NYS Assembly

Speaker - Eric Eve * Keynote Speaker - Hon. David Paterson, Governor New York State

ROUND TABLE ONE - EDUCATION - THINKINFINITY PRESENTATION & DEMONSTRATION

Time - 3:00 PM to 4:00 PM
 Venue - Royal Islander A

MC - Dr. Patricia Hazlewood

Speakers - Patrick Gaston & Albert Browne

ROUND TABLE TWO - LOCAL BUSINESS INITIATIVES

Time - 3:00 PM to 4:00 PM
 Venue - Royal Islander B

Speaker - Ed Goldberg, Eric Eve, Albert Browne

TOWN HALL FORUM - EDUCATION SHARING WORKING SOLUTIONS

Time - 4:30 PM to 6:00 PM
 Venue - Royal Islander A

Greetings - Michael Flanigan

Moderator - Dr. Marcella Maxwell

Speakers - Hon David M. Dinkins (Former Mayor, NYC), Dr. Edison O. Jackson, Dr. Marcia Keizs, Professor Rex Nettleford, UWI and William Byrd

HOST COUNTRY EVENING - CULTURAL PRESENTATION

Time - 6:30 PM to 7:30 PM

HOSPITALITY AREA

Time - 10:00 PM to 1:00 AM

SATURDAY NOVEMBER 8 2008**BREAKFAST - OCEAN TERRACE**

Time - 7:45 AM to 8:15 AM

PRESENTATION - WOMEN OF INFLUENCE AND POWER

Time - 8:30 AM to 10:00 AM
 Venue - Maho Beach

Greeting & Opening Remarks - Brenda Scott

Attorney Stanford Rubenstein, NYC Councilmember Dr. Kendall Stewart

ROUND TABLE TWO - HAITI BOLD INITIATIVES - THE DIASPORA - CBC & CARICOM
Venue - Royal Islander B

Moderator - Hon. Yvonne Graham

Speakers - Hon. Charles Rangel, Hon. Gregory Meeks, Hon. Ralph Gonsalves, Dr. Lesly Kernisant

TOWN HALL FORUM - TECHNOLOGY
Venue - Royal Islander A

Moderator - Colin Ward
Greeting & Opening - Marie Long

Speakers - Congressman Edolphus Towns, Albert Browne, Commissioner of Technology,
Congresswoman Eddie Bernice Johnson

GALA RECEPTION
Time - 6:30 PM to 7:30 PM

Speaker - Susan Taylor

GALA DINNER & AWARDS PRESENTATION
Time - 7:30 PM to 10:00 PM

Speakers - Dr. Harry Belafonte, Hon. Sarah Wesbot Williams, Leader of Government Business

HOSPITALITY AREA
Time - 10:30 PM to 1:00 AM
Venue - Hotel Conference Room

SUNDAY NOVEMBER 9TH 2008

POWER BREAKFAST - SPIRITUALITY THE BASICS IN BUSINESS
Time - 8:30 AM to 10:00 AM

Greeting - Lowell Hawthorne
Speakers - Ed Goldberg Local Minister

Selection - Local Choir

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POWERED BY JURAWAN TECHNOLOGY

EXHIBIT 2

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re: Representative Donald Payne
Review #: 09-4403; 09-3698; 09-6333; 09-2222; 09-2567
Date: May 12, 2009
Location: 2310 Rayburn HOB, Washington, D.C.
Participants: Leo Wise
Beth Horton

Summary: Representative Donald Payne attended the 13th Annual Caribbean Multinational Business Conference. We requested an interview with Representative Payne he consented. Representative Payne was given an 18 U.S.C. § 1001 warning and he signed a written acknowledgement of the warning. Representative Payne made the following statements in response to our questioning:

1. He attended the 13th Annual Caribbean Multinational Business Conference in 2008.
2. The conference was held in St. Maarten.
3. He made the decision to attend the conference. He co-chairs the Caucus so it made sense for him to attend.
4. He attended the conference the prior year.
5. He was invited to attend the conference by the Carib News Foundation.
6. He knows Faye and Karl Rodney and knows that they are involved with Carib News. He assumed they also ran the Foundation.

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

7. He met the Rodneys at the first conference that he attended.
8. He does not otherwise interact with the Rodneys. They are an older couple.
9. He does not see the Carib News often, it is primarily available in Brooklyn and the Bronx. It is a well respected paper that is geared towards the Caribbean.
10. He attended the conference from Wednesday through Sunday and extended his stay on his own for an additional two days. He departed on Tuesday.
11. He stayed at the Royal Sonesta in a standard room during his entire stay. He did not change rooms.
12. He did not recall the cost of the room, it would have been the same as the other days. He confirmed the charge on his American Express was for the conference stay.
13. He paid for the expenses for the extra two days with his personal American Express. He paid for meals separately.
14. Meals at the conference were included in the conference cost.
15. He did not see any figures for the registration fee or for the cost of meals. He stated that the pre-travel form should have the information.
16. He does not handle the paperwork for his travel. He did not review the post travel report, his staff handles all aspects of travel.
17. He thought the signature on the post travel report was his.
18. Darlene can sign for him but he usually does so himself.
19. He made remarks during the first night of the conference.
20. He recalled welcoming the participants to the conference and commending the sponsors, Carib News, for their efforts and objectives on the 3rd Border Initiative.
21. He thought that he commended the corporations for sponsoring the Foundation.
22. He recalled that Sears, Pfizer, and Macy's were sponsors.
23. He did not recall IBM.
24. He did not recall the ribbon cutting.

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25. He assumed Representative Kilpatrick spoke at the conference.
26. He assumed the corporate sponsors were general participants.
27. He relied on the Standards Committee approval and did not feel there was any issue after he received approval.
28. He was not aware of any restrictions on private foundation's ability to provide travel.
29. He has traveled with Aspen and on other trips so is familiar with travel rules.
30. He recalled that the government officials discussed deportation issues, healthcare, and education issues at the ministers meeting; otherwise, he was not aware of any participation by the government of St. Maarten in the organization of the conference.
31. He had several discussions with government ministers on various issues during the conference.
32. His brother also attended the conference.
33. He was surprised that there was an issue with the trip since he had received approval from the Standards Committee prior to attending the conference.

Beth Horton
Investigative Counsel

Exhibit 3

TRANSCRIPT OF AUDIO FILE:

11-7 AM SESSION - FIRST 30 MIN

Thank you for working with Accentance for your transcription needs. The text below represents a professional transcriptionist's understanding of the words spoken. No guarantee of complete accuracy is expressed or implied, particularly regarding spellings of names and other unfamiliar or hard-to-hear words and phrases. "(ph)" or "(sp?)" indicate phonetics or best guesses. To verify important quotes, we recommend listening to the corresponding audio. Timestamps throughout the transcript facilitate locating the desired quote, using software such as Windows Media or QuickTime players.

BEGIN TRANSCRIPT:

KARL RODNEY: ...Mike Flanigan how through the year his division has been supportive of the Mission and the Conference. And so we want to say thanks to Citi. You'll be hearing from Mike later but it's a great team to have working and great partners. We have Pfizer and a big supporter of (inaudible) aspect. Karen Boykin-Towns is not here, she has been able to in the past eight years and there's a death in her family and so she's not here to begin. Through the years work had done in the Caribbean circle in the United States and then a special touch to our work that can be done not only on the delivery of health care but overall awareness. [0:01:00.4]

And over from Macy's and its very fine team has been innovative in outreach to various locations we've gone to, finding new vendors, developing new contacts and really helping to make the conference a success by engagement of our local participants. So Ed and Brenda are tremendous supporters and we're so delighted that they're here with us.

IBM and Marilyn Johnson, Marilyn is Vice-President of Market Development, responsible for strategic marketing for Black, Asian and Hispanic, Native American and Women. Marilyn's a dynamic partner and you'll be hearing from Marilyn also. You should be alerted that between Brenda and Marilyn tomorrow is Women's sessions is going to be something to talk about. [0:02:09.5]

Marie Long is here from ATT but ATT has supported the Conference all 13 years. We started with them. They made sure that the Vision, the Mission of the Conference is supported through the many years.

We have with us Mr. Pat Gaston. Mr. Gaston is the President of Verizon Foundation, one of the largest private foundations in the United States. And Mr. Gaston has made his mark in moving that foundation to be a force in education in the United States. We are delighted he is here to be with us and to introduce a wonderful program that has been very effective in the United States (inaudible) to see if there is potential here in the Caribbean. So, Patrick, we are delighted you are here and we look forward to your presentation. [0:03:14.9]

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Preferred Health and a wonderful group of doctors, Dr. Valdez, Dr. Carl Kenel-Pierre, Dr. Kernisant, a group of doctors who have a network of centers through the United States but they also see and want to have that expanded to the Caribbean and also to bring a new kind of emphasis with respect to health tourism to the Caribbean and so they're here today also.

Dale Morris from American. American has been a partner with us for several years. Dale is expected to come in later on today but we want to acknowledge American and want to say "thanks".

Lloyd Williams from the Harlem Chamber of Commerce enough of his members are around and Lloyd has been supportive of this Conference from its inception and the Chamber has always been here with us and so we want to say "thanks" to Lloyd. [0:04:20.9]

Medgar Evers College under the dynamic leadership of President Edison O. Jackson has not only brought to the Caribbean a new vision of education, a new initiative with respect to men and empowerment but also the team that you see moving around they're from Medgar through the instrumentality of President Jackson working with us to document the Conference. It will be available too for a widespread distribution afterwards. So Medgar has been a true partner in making this Conference and this Mission work. [0:05:07.0]

Turner Construction, we have had a working relationship with Rev. Hilton Smith, he has attended several conferences and now he's with his colleague John Pierce to be a partner in the Mission of the Conference.

And, of course, the government of St. Maarten's under the dynamic leadership of leader Sarah Westcott-Williams and her dynamic team. We have always been working with - we always work with the leader and her dynamic group and we are just delighted at her own creative vision, her own determination and dynamic way of dealing with the Mission and dealing with the situation at hand. And we met with Commissioner Westcott-Williams and her team and she had a vision to suggest the theme of the Conference, time of transition, stretching for change and building the land session. So it was with that kind of background that we're here and to St. Maarten's we say, "Thank you very, very much." [0:06:31.4]

We have so many great partners that we shall hear from throughout the morning. We have through the Conventional Black Caucus and their members a set of agendas that have been accomplished, policies that have been achieved and programs that have been enhanced. And through the years they have been very effective when they have attended the Conferences our own (inaudible).

It was here at St. Maarten's six years ago that a group of hoteliers and vendors approached the members of our caucus to suggest that the Caribbean had been treated unfairly with respect to the duty-free allowance going into the United States. And it was within six months that it was changed through the effort of the members of the Black Caucus and so the Caribbean is better. And the Caribbean has benefited through millions of dollars of duty-free items that you know come through to the Caribbean.

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It was also here in St. Maarten's that the issue of tax exemption for conferences held in the Caribbean was again brought to the attention of the members of the Congressional Black Caucus and again that was achieved within a year. [0:08:08.2]

And so we've seen that kind of work constantly throw it's really the conference. So we can try to serve real achievement in fact in this room there is a couple that came from Denver to Barbados for their first Conference and they have built a region wide distribution for ice cream and fast food. And this has grown considerably.

It was also through the Conference that a small technology company with the value of \$2 million came, got a contract and that company in two years became a \$12 million company. And we've seen that kind of connection throughout the Conference. We could point to Barbados where technology was enhanced with respect to ATT work with the local Barbadian telecommunication company. St. Croix the fiber optics center, Grenada an oil refinery, all coming up with the expertise of the Conference to the (inaudible). [0:09:30.7]

And so the Mission is there to continue, the Mission is there to enhance, the Mission is there for us to make it work particularly now when we see the change has come and we can now come together to pad the agenda and to look forward to this kind of strategy for change. And so we want to welcome you. We promise that our sessions are going to be interesting. We have some of the best speakers that you can find on the various topics. We're going to see more when we get together the support we can bring to each other. The support we can provide with respect to the met work and certainly when we go back in the Caribbean we can really see results. We can come together as a people. You've been a great Conference. Thanks so much for being here. God bless. [0:10:28.4]

REV. DR. SUZAN JOHNSON-COOK: Thank you Mr. Rodney and we also thank you Mrs. Rodney as well. With interest we're here on the wave of the man who campaigned about change and on this transition to change and also strategic alliances. And we hope that will happen for you while you're here. Mr. Vide mentioned all of the sponsors who were with us and the partners who helped to make this happen and we're going to hear from three of them at this time at this quarter, Michael Flanigan from Citibank (Citi) and Ed Goldberg, Senior Vice-President at Macy's and Community for the Relations, and Patrick Gaston the President of the Verizon Foundation. In that order we will receive them this morning as they come, please. (clapping) [0:11:15.6]

MICHAEL FLANIGAN: Good morning.

ALL: Good morning.

MICHAEL FLANIGAN: It's really a pleasure to be here. As you heard before, Eric is on his way so I have the great privilege and honor of putting in for Eric. But first just wanted to say "thank you" and again welcome to the 13th Annual Caribbean Business Conference. This year was significant for Citi. For the first time we are the lead sponsor of this premier event. But I would be remiss in not thanking the organizers and our hosts here at St. Maarten so to the

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government, to the Commissioner Sarah Westcott-Williams, Governor Franklin Richards and Commissioner Roy Marlin and all the other elected officials here in St. Maarten and elected Congress members, appointed officials from the United States it's a pleasure to be here with you. [0:12:15.6]

We also of course have to thank the Rodney's as being 13 years in ensuring that this vision is carried out and delivered all across the Caribbean and I don't call to talk about some successes but I think one of the most important success that I think that I've experienced in coming to the Conference for the last six or seven years is just reunited with his great family. It's all about developing our communities. About we're all about the same thing, I think. We're all on the same page. We're all about the same agenda. And we're all about making sure that we absolutely care about each other, yourself but we care about the broader community. So it's always a pleasure to be here. I get re-energized every time I come. And so it's - I look forward to it - so it's one conference that I will never miss.

This Conference is an important gallery that makes a tangible contribution to dialog on the issues of important to communities. From recognizing the untapped wealth for underserved communities to building property alliances so that together we can build healthy, robust, organic economies. Today and tomorrow and even into Sunday are very important to that conversation at least to building a winning strategy to succeed in these turbulent economic times. I trust that we will all take full advantage of the great minds and the leaders that we are privileged to spend time with. I know my Citi bank black (inaudible) are ready. Thank you so much for having us here at Conference. (clapping) [0:13:58.2]

ED GOLDBERG: Good morning everyone.

ALL: Good morning.

ED GOLDBERG: As Mike said it's really a pleasure to be back with family today. We look forward to this Conference very year. Obviously, we hope that there will be many, many more over the years to come. I learned something from David Dinkins several years ago when you have a whole list of dignitaries in the house, the best thing to say is, "Present, protocol observed." So, Mr. Mayor, thank you for those kind words. (laughter)

Now a week and a half ago, Macy's celebrated its 150th anniversary. (clapping) When you think about anniversaries of companies today to believe that somebody could be around in the retail industry in particular for 150 years is quite an amazing feat. I'm sure that when R. H. Macy opened his store in lower Manhattan on 14th Street on October 28, 1858, he did not have the vision that the company some day; number one would last for 150 years; or that it would employ 225,000 people; or that they would do \$27 billion a year in business; or for being in 46 of our 50 states; and also the opportunity of having a business in 64 or 65 major markets in the United States. [0:15:30.9]

But today I'm hear to talk more about the Caribbean contract. The fact that we have been supportive of Carolyn Fay and this particular venture for the number of years but more importantly the fact that we come here to look for that spark that will ignite an opportunity to

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find that next Martha Stewart; that next design; or that new product that's going to sell in our stores such as we've done with the Rwandan peace baskets and products like that. And I think it is really why our Mission is so important, it's not just a question of change, not just a question of transition but it's building those ties and looking for those opportunities. That I think will bring us closer together. [0:16:15.9]

There's no question that we all face difficult times but I believe that the Caribbean is our backdoor and the bottom line in opening for us for expansion. No, I don't think we can build 250,000 sq. ft. mall stores but Macy's has to learn in transition how do we conduct business in the Caribbean communities. And I think we're going to find that way and obviously this particular convention is one of those opportunities to do so.

You all know Brenda Scott, my wife, (laughter), Judy's back in the room sleeping so I can say that. But Brenda and I have been together for more than 20 years. We have obviously been very much involved in our communities where we do business and we still believe we have a long way to go. But our mission is being supported by a great Chairman, Terry Lundgren, and the people of Macy's, so obviously we look forward to developing these bridges and developing the relationships. And I hope that in the not too distant future, we will be talking about a Macy's store here in the Caribbean. So enjoy your convention. I hope I'll get a chance to talk to each and every one of you as the time goes by over the next couple of days. And again, thank you so much, Carolyn Fay for the great work that you do. (clapping) [0:17:32.9]

PATRICK GASTON: Good morning everyone.

ALL: Good morning.

PATRICK GASTON: Thank you, Karl, for the wonderful introduction. Thank you, Michael and Ed for these great remarks. I extend welcome from our CEO, Ivan Seidenberg, and our 225,000 employees, many of whom are from the Caribbean mason including me. I want to acknowledge my colleagues and members of the public sector, members of the community, and I also, I guess, want to respect present protocol. Okay, but I have to single out a couple people, right? So thank you to the leader of government Sarah Westcott-Williams for hosting us today and the great people of St. Maarten. It's a delight to be back here. This is my eighth time in St. Maarten and I may stay. (laughter) It's wonderful. I want to acknowledge Karl Rodney for his exceptional ability to bring people together to recognize the collaborations that are important for business development. He does so with the grace that I admire and it's the first time I've had the chance to be here with you, Karl. and it's an honor to be here and a privilege so thank you for inviting me. [0:19:06.0]

I want you all to recognize Rex Nettleford, I don't know if he's in the audience still. But Rex and I have known each other for about nine years when I first joined the Foundation of the University of West Indies Board of Directors. And one of the things that attracted me to the University in addition to Karl, of course, was that Rex was the kind of leader that reflected a lot of commitment and enthusiasm about education; something that I care deeply about. And over the years has provided me with his counsel and friendship and I thank you for that, Rex. (clapping)

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You know. Verizon does not have a retail presence in the Caribbean and I hope some day we will. But we do provide global Internet networks that help to provide a lot of communications that you might experience here. So I think we're in the game and we realize the value of technology to ensure that folks have access to incubation and education. In my case at the Verizon Foundation, Karl mentioned that I head up the Verizon Foundation and our emphasis is on education. And what we're trying to do is deliver resources to teachers in the classroom that need it really badly. So we're developing contact and we're taking with our partners, we're taking that contact and making it available through our technology platforms so during the course of today in the discussions that we'll have, we'll talk about that resource. Which, by the way, is offered free of charge to teachers around this country and now around the globe, so we want to make sure that we present this resource as another thing that this community can use and use it in a way that's free. So I'm looking forward to this dialogue and am excited about this Conference and I thank you very much, Karl, for inviting us to hear quality. [0:21:06.2] (clapping)

REV. DR. SUZAN JOHNSON-COOK: Thank you very much. I loved language in school. I remember ottomottopea and phizz and those words and oxymoron, best of times, worst of times, homonyms, the words that sounded alike with different meanings but synonyms when you said the word you could understand what it meant. It was synonymous with something. So when we say the words, "front line", "civic leader", "activist", "Miss NAACP", "world leader". "you don't want to mess with her", you know it is synonymous with Hazel Dukes and we want to hear from her, our God, mother, our community, don't you think I'm right? (clapping) Miss NAACP, Miss Leader, our dignitary, let us receive this morning, the Honorable Hazel Dukes of New York City. Are there any New Yorkers in the house? (clapping) Let's get a little noise over here. All right.

HAZEL DUKES: Good morning.

ALL: Good morning.

HAZEL DUKES: This is my 12th Conference. Missed only one because I had a broken ankle and it was just like four weeks before the Conference, not even, be on the cast. But let me say to Fay and Karl that they have been the glue without the (inaudible). They are for us 24-7. Not only just in New York City but the Islands we have attempted. The NAACP will be celebrating its 100th anniversary in New York City where it was founded July 14 through July 17. Medgar Evers, the college, the university, the (inaudible) of the city of New York, when George Blackburn and I sit and watch TV and we hear all people go over their history, people forgot that it would not have been possible if it was not for those names, Medgar names known or so many others in Alabama for Rosie, decided to sit. So Maude could stand. Maude could not have stood if Rosie hadn't of sat. Rosie was the Secretary of the NAACP, the National Association for the Advancement of Colored People. The Colored People come in all colors, when you make your beautiful salad you just don't want all greenery in it. Even with your omelet this morning you could have a mixture, of beautiful flowers I have to have all colors. And so for a hundred years this old ship resigned, been around. Lord, I was reminiscing last night Congresspersons who we went to the Congressional Black Caucus there was only six. We used to be at the Hilton Hotel. And we held court. When we started in Albany there was no black and Puerto Rican caucus, there was the

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now, the next mayor for the city of New York, Bill Thompson's father, who was the regional director for the NAACP who went on to be now retired. [0:24:54.4]

It would not have been 106 mayor of New York City of Percy's son, a former President of the New York City branch of the NAACP, Balford Calison (sp), Secretary of State and now the government of the state of New York has his first job at the NAACP. So I want us to learn history so we can have our brothers and sisters in (inaudible) and those who are coming to the shore of these United States to understand the kitchen of our connectiveness to (inaudible). How soon you could forget the history that those from the Caribbean have played to make America what she is today. [0:25:44.8]

And so I join with Karl and Fay every year I trek here because they joined with me in New York City trying to break the (inaudible) of the two communities because Rolly Johnson said this morning, Cook said this morning, Johnson Cook said this morning, "When we join hands together, when we come and talk about the multi national conference, we're global now, we can't think we just in Brooklyn, we just can't think we in the Bronx, we just can't think we in Manhattan and in Queens and Staten Island. We are all over this country. And when we saw the crowd of people, black and white, Jew and Gentile, Muslim, Asians, all across this country who came out for Obama, it is a change in America. And then we African-Americans and the Caribbean's have to absolutely solidify our tie. Because if America is to be what she was born to be, it would be that so on behalf of our new President Ben Judds who I'll promise will be here next year, 35-year-old Rhodes scholar, ingratiating young brother who is so excited where we are going. And my sisters in the Congressional Black Caucus and my brothers, we going to get it together. As our Congresswoman told us yesterday. "We're tired of talking about it. It's (audible) we are sick and tired of being the sick and tired." And so when we leave here, we will be better off because we came together to make new friendships, to re-energize and I would say to Karl and to Fay, our sincere gratitude to you for bringing us together as a family each year. Some of us even don't have enough time to sit. That's why Laura convinced me to come a day early. Even if I don't know what's happening with my 401K, (laughter) I'm nervous, Mr. Comptroller man. I don't know about vacation but we thought it not right not to come here and be with our family. Thank you so much. [0:28:13.4] (clapping)

REV. DR. SUZAN JOHNSON-COOK: We thank you so, so much. He began his second term in January 2006 as the 42nd Comptroller of the City of New York. He's come from a distinguished parenthood, a famous judge and a mother as a public school teacher, but he has distinguished his own path. And he has become a wonderful Comptroller of New York City and he has responsibility for all the city's pension funds. He's just a good brother. He's here with us today, hope to be the next mayor of the city of New York. Let's put our hands together for William C. Thompson, Jr., the Comptroller of a great city of New York, New York. All right?

WILLIAM THOMPSON: Thank you Reverend for that very wonderful introduction and it's good to see you here as our Master, or Mistress of Ceremonies, this morning. And I go ahead and make a mistake. I should have had the Mayor open up for me because he always does it correctly. But to our leader of government, Commissioner Westcott-Williams, to the members of government here in St. Maarten, my colleagues in government all over the United States, friends, good morning.

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ALL: Good morning.

WILLIAM THOMPSON: It is definitely a pleasure to be back again even though following Hazel to the microphone is always an indubitable thing to do. [0:30:01.1]

END PART 1

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TRANSCRIPT OF AUDIO FILE:

11-7AMSESSION - 30 THRU 75 MIN

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BEGIN TRANSCRIPT:

(Part 2 – beginning at 30:00 through 1:15)

WILLIAM C. THOMPSON, JR.: - It's good to be back again and let me first start out by thanking, and I always term them as I did last year and I have continued to do it over a period of time, termed them the "dynamic duo," Faye and Karl Rodney. [applause at 0:30:16.7] They happen to be, when it comes to vision - and that's exactly 13 years ago when putting this conference together, they had a vision. It is something that they have never taken a step back from. They continue to move forward, they continue to bring us together. And while we have the opportunity to meet, to have conferences in some wonderful places, just fabulous environments and that is the truth, but they work us, okay. Karl and Faye let us understand that we may meet in a wonderful environment, you walk outside and it's gorgeous, but we are here to accomplish things. [0:30:58.7]

Karl mentioned when we were here before, and I remember the discussions with the members of the Congressional Black Caucus, and it wasn't just those who owned hotels, it was members of government who had indicated then that the (inaudible) \$200 dollar duty-free or the amount that you could bring in the country hadn't changed in decades, in years and years and years. And I remember that members of the Congressional Caucus, the Congressional Black Caucus led by Congressman Charles Rangel, the Chairman, and now he wasn't the Chairman at that point, he went back to Washington and in a period of months the amount had doubled from \$200 to \$400 dollars. It was the right thing to do but you saw the power of this Congress. As I said, we might come together in wonderful places, but it is about business. It is about increasing the ties. It is about the business between the Caribbean and the United States and increasing those business opportunities, helping to raise the standard of living for many; helping to build businesses and institutions, that's what it is about. [0:32:09.5]

Last year, Karl had me down here and - no I'm sorry, last year after our conference I worked. I must admit, Karl had me as a luncheon speaker, we were outside, it was about 85 degrees and I was in a tie okay, I was in a suit and tie and it took me a couple of hours afterwards to dry out. But the one point that was made then was Karl looked at me, and those of you who know me in the

introduction as New York City's Controller, I'm a member, a trustee of four of our five pension boards, chief investment advisor to all five. Our total assets in knowing, it might have shrunk a little, but our total assets are about \$95 billion dollars right now. We are the fifth largest public pension fund in America. [applause at 0:33:02.4] At that point Karl looked at me and said, by the way how much of that is invested in the Caribbean basin? How much of that money is going to create, to build infrastructure, to help with tourism, healthcare and other things? And it was an impressive question and I went back and the answer was not much. Not much, so we started to go at that point down the path of looking at investment possibilities in the Caribbean basin; obviously a very promising area. [0:33:42.0]

To go back to quote just a couple of numbers as we would look at - now it has been a tumultuous year on Wall Street, at the same point, many of the investments, as we were termed that we have made in the emerging markets around the world, have outperformed developed markets. For instance, one year, three year, five year performance of emerging market equities has been on par or better than the United States private equity, the United States venture capital, Western European private equity and U.S. public markets. Clearly it makes sense for institutional investors to begin to move further into those waters of emerging markets. [applause at 0:34:25.8]

So we went back and started to engage, particularly we looked at private equity, and the way we invest usually isn't directly it is in private equity funds; so we began and our private equity consultant, we asked them to take an initial look at the Caribbean basin for how much initially should we be investing. And the number that they came back with was \$80 million dollars. That would be our first step into investment in the Caribbean basin through a variety of investment vehicles. We started to move down that path and unless I am wrong, and if I am I will be short a few people or I will lose a few people in my investment side, but I believe that yesterday back in the office, back in front of one of our pension boards. we approved the first application of \$30 million dollars to be invested in the Caribbean basin. [applause at 0:35:25.8] And, we are going to continue to move forward through other investment vehicles to invest and commit, or really to commit and invest, the additional \$50 million dollars and then we will take a step back and look for other possibilities. [0:35:46.8]

So I just wanted those to know that conversation, that investment of money, and as I pointed out it will range in everything from real estate to infrastructure, industries ranging from healthcare, financial services, energy, telecom, tourism and other areas, but that started last year at this conference. [applause at 0:36:09.8] So to those who say, "Jeeze you are going to St. Maarten? Have a wonderful time. I know you are going to spend a lot of time on the beach," Karl and Faye make sure that we are working hard and that we are getting things done. [0:36:28.6]

And at this conference. while it is great to see friends and colleagues and some people I don't get to see for a year, we are here working and we are here making sure that we increase and bring closer those ties that we have had in the past and that we are helping to grow business, that we are helping to improve quality of life both here in the Caribbean and back in the United States.

So again, it is a pleasure and let me say again to Karl and Faye, thank you so much for the leadership that you have shown. We look forward to your continued leadership for years to come. Thank you so much. [applause at 0:37:04.2]

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REV. DR. SUZAN JOHNSON-COOK: Thank you for working hard while you are here and even back at home. Thank you. It is so good to be together. We do get to sit down and talk to each other here. We try to get on each other's calendars in the City and we never do, but here we are able to make and transact business and it's wonderful.

As a point of personal privilege, it is not everyday that you have a city world leader that you know very well is a man of faith first of all, who reads the Holy Scripture at your wedding. It's not everyday that you go into (inaudible) flavor at a press conference that he has called and then he comes to the hospital to see the birth of your first child. It's not everyday that you have someone who is there at the blessing of that child who's named after him. It's not everyday that you have someone who hosts Whitehouse Fellows when the run, coming to New York City and gives them the key to New York. And, it's not everyday that we have the first African American Mayor of the City of New York in our midst. We are in the midst of history here. He was the 106th Mayor for the City, but he is our number one Mayor, the Honorable Mayor David Dinkins, Professor in the Practice of Public Affairs at Columbia University [applause at 0:38:16.8], and our wonderful, wonderful leader who's shoulders we stand on and for who we cheer for in honor this day. Let's hear it for the Honorable David Dinkins. [0:38:28.4]

DAVID DINKINS: Well one thing is clear, if I had had the good fortune of having the Reverend introduce me more often I might have gotten re-elected. [laughter at 0:38:48.4] I am delighted to be here, but I want to clear one thing up from the start. I think it should be acknowledged that Faye Rodney has been such a wonderful person and to think that she permits her husband to come along with her the way he does [laughter at 0:39:10.1]. It's really nice. She even lets him think he's in charge every now and then. [laughter at 0:39:16.6] But they are a dynamic duo.

I am delighted to be here with you, I truly am and each year, I guess I've been here ten out of - at least ten times I think - and each year I try to get myself on the committee that will go and do the, make the decisions on where we are going to go next year so I can visit the islands but they have not yet let me come. But each year though, I insist that the tennis facilities be adequate, but I am not playing this time. But I want you to know my friends (inaudible) that they were out on the court this morning and I will get a report and it better be good. [laughter at 0:40:14.3]

I am delighted to be here with you, I truly am and we are taking a role and those folks who are not here now, but are still having breakfast or are out on the beach, we've got their names; [laughter at 0:40:33.0] and we are going to chastise them severely. But it really is a wonderful, wonderful opportunity to come together with friends. For me personally it gives me an opportunity to say thank you to so many of you who helped me become the 106th Mayor of New York. [0:40:51.2]

We say often that everybody stands on somebody's shoulders, and by that we mean Malcolm X and Martin Luther King and (inaudible) and Harriett Tubman and Rosa Parks and for me, for me personally, it also means Percy Ellis Sutton, [applause at 0:41:13.0] who ran in 1977 with such class and distinction that nobody laughed at me when I dared try in 1989. And we were successful and it is a broad leap. [0:41:33.6]

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Certainly, I was simply privileged to be the stand bearer, but it was many of you here gathered, many of you who worked with me, worked with me in our administration like Laura and Hazel and so many of you, and I know that we wouldn't have gotten nothing done had it not been for the man called the Rumble Genius by the New York Times, Bill Lynch. [0:42:02.3]

Bill used to say, good government is good politics. And you will note on his literature, he's got a consulting firm now and a whole heap of clients and is doing very, very well, you will note that he uses that slogan and it is certainly true. If you do that which is right in the first instance, it will inure to your benefit politically as well. [0:42:34.5]

So we didn't make judgments politically and then say well let's see how that will play out, we did it the other way around. We did what we thought was right and then it inured to our political benefit and I am so proud of so many of the people who helped us succeed as they go forth now. And I can't believe how young they were, some of them are still young even now and maybe it's because I am so old that it looks that way. But it really is an example of what can happen when good people come together and work hard. [0:43:11.7]

And I know that President-elect Obama is going to do well because he is going to surround himself with bright, intelligent, trustworthy people on whom he can rely on. Because no executive, no executive, not even Ed Goldberg, can get it done alone. You've got to have help and you've got to have people to whom you can delegate and you have to have people who will make a triage. You can't look at the thousands upon thousands of things that will come before you. They have to do a triage and bring to you those that they deem to be of significance for you to make a judgment, and then you will make a decision among them. [0:44:00.6]

I am confident that President-elect Obama will make the correct decision once he knows all the options, but he can't know all of the options if they aren't brought to him in the first instance. And the reason that I have such faith that he will be surrounded by good, bright people is the kind of campaign he ran. [applause at 0:44:26.1] He ran one hell of a campaign so it sort of suggests that he will do as well as our President. That is not easily done, particularly in these difficult times, but when Alan Greenspan said, "By God I didn't know it was this bad," or, never (inaudible) how the hell he doesn't know, how am I supposed to know." So it is difficult for sure, but we are going to survive this. They say that that doesn't kill you makes you stronger, so we are going to survive this. [0:45:01.0]

Ed Goldberg made reference to my custom, my habit that I got from African diplomats of instead of acknowledging everyone in the audience, which I would want to do and my staff would go absolutely crazy because I would acknowledge all of my friends and they - I did that once and my wife was standing right next to me and I acknowledged everybody in the house except her. Hell of a ride home [laughter at 0:45:29.6]. But, the African diplomats have this custom, they say, "Usual protocols observed." So, President Jackson that means that you have been acknowledged. [laughter at 0:45:45.2] See, that's the way they do it because if you do otherwise, if I go on to describe how Hazel is my assistant and how - let me tell you, you don't want Hazel against you ever, but by God if she is on your side, nothing can stop you; you will win. [applause at 0:46:12.5] And we are all going to turn out as she leaves us in celebration of NAACP's on it's anniversary it is going to be a

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monster, it's going to be a gas to be right in New York and I hope everyone here comes. It is really going to be something. [0:46:34.5]

I say to audiences, the media in particular has been asking me, "Well what's it like for President-elect Obama the first African American President of the United States?" And their theory is they are asking me because I was the first black Mayor and I try to explain that there is a world of difference. While I got to be the head of a city of 8 million plus people and that's terrific, and we have more separate ethnic identities than the United Nations has member nations, so we are truly a magnificent city, but Obama is not only the President of the United States, he is the leader of the free world. So you really can't make a comparison, you can't. Although, I am sure that he's got to feel wonderful because as he said as his grandmother wasn't there at the very end, but fortunately he got to see her, imagine how the family feels, his wife, his children, so I do understand that part and it is a hell of an accomplishment that he has done, but even he could not have done it without you. And he knows that and that is the beauty of it. [0:48:02.8]

I recognize that those of us who have been privileged to serve, it is a privilege and you have to see it that way and recognize it that way and do the best that you can under the circumstances, but never, ever believe that you got there alone, because that's just not true. I am almost amused, I say almost because I feel a little sorry for the distinguished Governor of Alaska, and it's coming out now how they are swallowing in house. I don't know whether you have seen the current press and how they talk about the poor lady and she is trying to defend herself and I almost, underline almost, feel sorry for her, but, she made it up there. [0:48:54.1]

So to my friend, Suzan, the Reverend Doctor Suzan Johnson-Cook, you all - many in this audience knows that she took a congregation of about 11 or 12 people, meeting at lunchtime down near City Hall, and built it into a congregation in excess of 1,000. She did that. [applause at 0:49:25.9] She is a very, very special, gifted woman. And I say that she is here with us at this 13th annual meeting, notwithstanding the loss of her dear brother, my friend, our friend, Charles, very recently. A young man who has gone to his reward and she is with us nonetheless and we appreciate it. [0:49:59.4]

Charles was quite a guy. He didn't like to be called Charlie incidentally; he was Charles. It's sort of like if somebody says they know Joe Hines who's name is Charles J. Hines and they'll say, "Oh, I know Charlie" and you know that they don't know him worth a damn because he is Joe Hines. [0:50:24.2]

So, to be here in the company of Carolyn Kilpatrick, the Representative in the Congress who takes care of our brother Charlie Rangel; that is special. That is special. You know one year we had something like 35 members of the Congressional Black Caucus here, I think it was 35, it was over 30 certainly, and that got the attention of a whole lot of people. It got the attention I'm confident of some sponsors who said well next year maybe we ought to up ours a bit and they did and that's the genius of Faye that she let's Karl come along with her here. [laughter at 0:51:15.3]

Its true that international black heads of states have prevailed in nations with majority black populations, but never before, never, ever in the history of the United States has the Chief of State, the Commander in Chief been other than a white male. And many of us grew up in the days of Jim Crow and dozens of African Americans were still being lynched; 24 in 1933 when I was six years

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old. They were stilly lynching folks and as a matter of fact I can recall some years later as we started to make (we meaning blacks) started to make some progress, we were told things like, "You Negroes (that's what they called us then) you Negroes shouldn't be so pushy, they only lynched five last year." We were supposed to be grateful that so few of us had died. [0:52:15.2]

Then there came World War II, segregation, as we went off to fight and die for our country. And when I got out of the Marine Corps in 1945-1946 and some of my classmates had shrapnel in their bodies, and we could not go to the movies downtown in Washington, D.C., the Nation's Capital, couldn't shop on F Street is you had to try something on, and this is after the war; the war that ended all wars. So we have come a long way since those days, but things are not perfect even now because I maintain that we live in a racist society that is the legacy of slavery, but that does not mean that we have not made great progress. Imagine a black man, President of the United States of America. [applause at 0:53:20.2]

I can remember when there were certain jobs you couldn't even apply for, couldn't even think about it. We got the right to vote by the 15th Amendment in 1870, but we weren't able to exercise that right to vote until 1965 when the Voting Rights Act was passed. As a matter of fact, if you think back on some of the games made during the Civil Rights Days by Dr. King and so many really heroic women and men. And I have to tell you I ain't to sure that I could have followed John Lewis getting beaten down into the ground and he kept coming back, I'm not sure that I could have done that. [0:54:18.7]

I'm not sure that I could have done what the Tuskegee Airmen did. You know about the Tuskegee Airmen, everybody does, they said blacks weren't intelligent enough to learn to fly. And then B.O. Davis who in four years at West Point nobody every spoke to him, they didn't talk to him, and he came through all of that and won the fight for black men to learn to fly and then they said, well you can't go into combat because you will be cowards and turn in the face of the enemy. And then they won that battle and they did it so well that people like Roscoe Brown and Lee Archer and Percy Sutton and so many others, they fly in cover for bombers and never lost a single bomber, not one. [applause 0:55:19.1] So much so that the white bomber pilots would ask for them and I can remember, while I wasn't personally there, the black Marines who were trained in Camp Lejeune in North Carolina, white troops went to Parris Island in South Carolina and they thought that the black Marines were somehow not quite as good as the white Marines, but when the black Marines hit the beach carrying ammo for the guys that were pinned down and running out of bullets, they loved them to death. It's funny what need will do; it's funny. [0:56:16.1]

This election has at last put to rest, I think, any doubt that Americans as a whole oppose the failed economic and social policies of the Bush administration, with its record deficits and recession. Billy Thompson knows about that. Phil used to properly regulate financial industries that led to the loss of retirement pensions and the sub-prime mortgage crisis, outsourcing of American jobs, increased unemployment and refusal to work toward a living wage for job offers, failure to support programs that curtail practices that harm the environment and damage or destroy natural resources, failure to end the war in Iraq and approve any meaningful plan to withdraw troops. [0:57:12.3]

Speaking of Iraq, don't it just get you right here when the Bush people lied to Colin Powell and sent him to the United Nations to tell those lies, and didn't it make you feel good when he came out

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for Obama recently; I mean you know [applause at 0:57:38.5] by God, and he is a guy, you know, he is one of our heroes. He truly is, he truly is. [0:57:52.2]

The American people have spoken across the party lines, social classes and racial divide in support of programs to provide affordable and accessible healthcare, to stimulate economic growth and provide a living wage for American workers, to transform energy consumption and reduce American dependence on foreign oil to improve schools by ending No Child Left Behind, and end the war in Iraq and bring the troops home. Some of you will recall that when the troops came home after Vietnam, our country treated them terribly. They spit at them. They didn't ask to go, but they were treated awful. Korea was a little different. And as Charlie Rangle says, he hasn't seen a bad day since. Charlie was pinned down in a foxhole and came out of there with a Purple Heart and Bronze Star and he hasn't seen a bad day since. [0:58:57.2]

But, even though Americans, whether Democrats, Republicans or Independents, have responded overwhelmingly in support of measure that the new President may be compromised I say, at the outset by the actions of the outgoing administration. Keep in mind that he doesn't take office until January 20th and I'm counting on our friends in the Congress to do whatever they can to see to it that he doesn't start off in a whole, because that is what can happen. It is possible; I hope it doesn't happen. [0:59:41.9]

Earlier this year in February of 2008 I participated in a panel at a meeting of the Independent Newspapers International Advisory Board in Cape Town, South Africa on the topic "End of the Bush Era in the United States." And our discussion, neither prophetic or profound, merely reflected the ground swell for change that has this week resulted in one of the most historic moments in American history; the landslide election of the first African American to the Presidency of the United States of America. [1:00:20.7]

The majority of the American public, irrespective of political party affiliation welcomes the end of the Bush administration, by whatever measure we choose to evaluate its impact, domestic and global, this has been a failed presidency that has brought the United States to the brink of disaster and some say beyond the brink. We could recite the long list of offenses perpetrated or orchestrated by that administration that have passed in the name of foreign policy and global economy. [1:00:57.0]

While the United States has now emerged from unprecedented two-year campaigns, some like the New York Times editorial staff have cautioned that we should pay close attention to the efforts underway to perpetrate the policies of the past seven years with Bush. And at the risk of putting a damper on the celebration of Tuesday's victory, I do feel compelled to call attention to a few of the concerns that lay immediately ahead. [1:01:31.7]

True the Congress has a Democratic majority and the political capital of the sitting administration has been all but spent by the wars in Iraq and Afghanistan, and the worst economy since the Great Depression, but even with the lowest approval rating of any president in the history of our country, he has pressed on to do everything possible within his remaining days to compromise the new president, who will take office with the greatest mandate from the people in a century. [1:02:05.6]

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He has abused the political process more than any of his predecessors, undermining the power of Congress through the use of Signing Statements. Over the last seven years he has issued hundreds of these documents, devices showing us that he had no intention of obeying laws, that he has claimed impinged on the constitutional powers of the Chief Executive. Examples of such Signing Statements are those that authorize domestic surveillance without warrants, torture of prisoners in violation of the Geneva Convention, and firing U.S. Attorneys for political reasons. [1:02:50.5]

Others include a host of executive actions designed to impede congressional programs to expand health insurance and prevent further pollution of the environment. The disastrous Bush Lame Duck Budget proposal announced at his last State of the Union Address contained provisions for permanent tax cuts for the wealthy and the highest level of military spending since World War II and reductions in spending for medical research, environmental protection and education. [1:03:26.9]

President Obama will have to contend with this and a series of other eleventh hour measures. We are confident that Congress will reach across the aisle to combat the resultant stranglehold from President Obama's ability and move forward our country. We have along way to go in repairing the damage done over the past seven years. And although we deserve to relish the moment of victory, we do understand that we have more battles to fight and miles to go before we sleep. [1:04:00.1]

We should congratulate those other political leaders, some of whom are with us here today in St. Maarten, for their election and reelection victories as well. [applause at 1:04:11.2] And as one of these, the Dean of the New York City Delegation of Democrats, my brother Charlie Rangle. And this is a quote from my brother. Charlie says, "The world we look at is a world of many colors, many cultures, many faiths and what we as Americans have to offer is our experience in creating a diverse society as we show the world all of the diversity that is the strength of America. We reflect our values and present an example to the world. With our nation growing international involvement there could be no better time to attract the best and most diverse (inaudible) to represent the American people in every corner of the globe." so says Charlie Rangle. [1:05:05.3]

When we break for lunch we will hear the distinguished Governor of my home state of New York, the Honorable David A. Paterson. He will talk about the importance of building upon the partnerships necessary to translate the watershed victory of democracy in the United States into lasting change. I can't resist remind us that the governor's father, Basil Paterson, once won 61 out of 62 counties in New York State in a Democratic Primary for Lieutenant Governor. And then he joined the of (inaudible) of Goldberg. He was a former United States Secretary of Labor, former United States Supreme Court Justice, former United States United Nations Ambassador, the lousiest damn candidate you ever saw. So Basil did not win, but he would have become the first black Lieutenant Governor of New York State and eyes on the first black governor. So imagine, as I sat in the front row at the state committee meeting and Basil placed David's name in nomination for Lieutenant Governor. I had tears in my eyes. It had come full circle and now that same David is Governor of the State of New York and you will hear from him later. [applause at 1:06:41.3]

Later this afternoon we will meet to share our thoughts and plans for sharing working solutions to education. There are challenges is business and political leaders will be to craft strategies for keeping the doors of the international education open to our future leaders. The world will be a

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dimmer place if we let the lamp of knowledge go out for a generation of our young people. It is within our power to turn up the flame and keep it burning bright, and in the words of President-elect Barack Obama, "Yes we can." [applause at 1:07:24.8]

REV. DR. SUZAN JOHNSON-COOK: Thank you Mr. Mayor, and thank you for looking so wonderful. He's dapper, Amen! Doesn't he look good? [laughter and applause at 1:07:42.4] And Barack Obama stands on your shoulders because you took the blows that shows what a man of faith could do and we thank you for representing us well. [1:07:52.3]

We also are joined by many a (inaudible) joints throughout this conference by many elected officials and some are here this morning; elected officials from the State of New York. You will hear later from the Honorable David Paterson, you heard from our City Controller Honorable William C. Thompson, Jr., Honorable Adolfo Carrion, Jr., President of the Borough of the Bronx; Honorable Nick Perry the Assemblyman for New York State, The Honorable Ruth Hassle-Thompson, State Senator New York State, the Honorable Keith Wright is with us this morning, Assemblyman for the New York State the Honorable Inez Dickens, Council Whip, Member of the New York City Council, and Honorable Dr. Kendall Stewart, Member of the New York City Council. Can we applaud for all of the elected officials from the State of New York? [applause at 1:08:34.3]

And then members of Congress who will be joining us throughout, some of whom you heard last night and today, the Honorable Donald Payne, the Chair of the Subcommittee on Western Hemisphere, the Honorable Bennie Thompson, Chair of Homeland Security, Honorable Donna Christensen, the Honorable Chair of the Subcommittee on National Resources, Honorable Sheila Jackson Lee and now we are also going to hear from one of our Presidents of the Congressional Black Caucus, the Honorable Carolyn Cheeks-Kilpatrick. We are going to the federal level y'all [applause at 1:09:09.6] who is our President, Madam President and will be working with Mr. President would you please come and let us receive her this morning for what a wonderful job you have done and you have served with distinction as well and we celebrate and salute you this morning. Can we applaud the other members of the Congress who are with us? [applause at 1:09:29.1]

REP. CAROLYN CHEEKS-KILPATRICK: Giving honor to God who is the head of my life, present protocol being established [laughter at 1:09:46.3], but I've got to say a couple even given that. To Faye and Karl, its really thoroughly been said but thank you from the bottom of all of our hearts. We could not do this without you. Thank you very, very much. [applause 1:10:00.4] We could (inaudible) every week in our Washington offices, but that's how we keep up with the Caribbean if not for the newspaper, there would be no association that we could actually see and know what is going on and how we (inaudible) so thank you very much from the bottom of our heart. Thank you very much. [applause at 1:10:18.6] Commissioner Wescot-Williams as well as all the commissioners over here. St. Maarten, one more time. thank you for hosting us one more time, we love you, thank you very much. [1:10:29.4]

Our key ingredients for the Congressional Black Caucus where I Chair 43 members, we come from 21 states, we present over 40 million Americans; [applause at 1:10:40.8] five full Committee Chairs. 17 Subcommittee Chairs and others like the Majority Whip and Jim Clyburne from South

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Carolina and others who help to control the Congress. We have the first African doctor in the house, a member of our Caucus who chairs our health branches and very instrumental in us being here, why don't you welcome my sister. Dr. Congresswoman Donna Christensen. [applause 1:11:11.7] Thank you, we love you.

It was mentioned earlier that, and I'm going to say who else is here, you heard from Dr. Payne and I know if he is here in this room you will hear from him again. you did last night, who chairs our Western Hemisphere Committee. Bennie Thompson who is here and I think he came through last night, he chairs our Homeland Security Committee also will be here. Sheila Jackson Lee from Houston, Texas and I know many of you know her, she is en route and will be here just shortly. Our number uno Congressman, second only to John Conyers in seniority, from the great state of New York, Chairman of the House Ways and Means Committee. our big brother Charlie Rangle will be here this afternoon. [applause at 1:11:55.3]

And what you probably don't know is the federal budget is \$3 trillion dollars. Charlie's committee handles \$2 trillion of that for Medicare, Medicaid, for veterans programs; his committee is the committee that produces the revenue, \$2 trillion of it, giving it out in what we call entitlements to those programs. I served on Appropriations where the committee spends the money, and I like that too. We spend a million and Charlie generates it and gives it all by formula to the entire committee and our committee handles the appropriations in sending it out. [1:12:33.0]

Together we make up the Congressional Black Caucus and it was said earlier, many more members will be coming and will have come over the years, but I just wanted to say a point of personal privilege, this last six months, the last two months and the last two weeks, members of the Congressional Black Caucus have been crisscrossing America for our now President, Senator Barack Obama. [applause at 1:13:00.1] Even as we had our own elections [applause 1:13:02.4] Tuesday we were all on the ballot as well but (inaudible) just thinking as it relates to it's is major, but most of us went to many states all over this country. [1:13:12.4]

You see 18 of our members represent less than 50% of the African Americans; three of our members represent less than 15% African Americans, the most that any of us represent is a 62% African American so we represent all of America, Asians, Africans, Latinos, Europeans, Native Americans, you name it and we are called the conscious of the Congress and we really are that you know. [1:13:38.5]

God built us from a certain kind of way and we got some of this stuff in us that you do, you cross ethnic lines and it makes us stand up for righteousness, speak up on injustices and when we see something wrong you have to hear it because, of course, we are the conscious of the Congress. So in the spirit of (inaudible) is that Congresswoman Christensen talks about healthcare it's real. They have more because we have less. [1:14:03.2]

We hope and we know that with President Obama yes we had some difficult times in the Mayor laid them out well. And to the sponsors by the way, all of you, we couldn't do this. be with you. help Karl if you weren't here with us so we say thank you very much. you are so important. To all of the sponsors, thank you very much. [applause at 1:14:23.9]

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So as we move to these next four years, two months, 32 days - talk about the short period between November 5th and August 20th, [sic] President Bush is still the President. Our Constitution says that if there is unrest or malice or whatever, the sitting President can hold off and not let happen the January 20th date. There isn't many people that know about that, so we don't want any - we were kind of scared about November 4th when we won. We wanted everybody to be prayerful, be (inaudible) and have fun and all that, don't burn [1:15:00.5]

END PART 2

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TRANSCRIPT OF AUDIO FILE:

11-7AMSESSION - LAST 20 MIN

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BEGIN PART 3:

REV. DR. SUZAN JOHNSON COOK: Thank you, Mr. Mayor. Thank you for looking so wonderful. He's dapper. Amen. Doesn't he look good? (clapping). Barack stands on your shoulders because you took the blows and showed what a man of faith could do and we thank you for representing us well.

We also are joined by many and will be joined throughout this conference by many elected officials. Some are here this morning; elected officials from the State of New York. You will hear later from the Honorable David Patterson. You've heard from our city controller, William C. Thompson, Jr., Honorable Adolpho Carrion, Jr., President of the Burroughs of the Bronx, Honorable Nick Hardy, the assemblyman from New York State, the Honorable Ruth Hassell Thompson, State Senator of New York State, the Honorable Keith Wright is with us this morning, assemblyman from New York State, the Honorable Inez Dickens, council whip member of the New York City Council, and Honorable Dr. Kendall Stuart, member of the New York City Council. Can we applaud for all of the elected officials of the State of New York? (clapping).

Members of Congress who will be joining us throughout. Some of whom you have heard from them last night and today, the Honorable Donald Payne, Chair of Subcommittee on Western Hemisphere, the Honorable Bennie Thompson, Chair of Homeland Security, Honorable Donna Christensen, the Honorable Chair of Subcommittee on National Resources, Honorable Sheila Jackson-Lee, and now we hope to also hear from one of our presidents of the Congressional Black Caucus, the Honorable Carolyn Cheeks-Kilpatrick. We're going to the federal level you all; who is our (inaudible) president. We're only working with Mr. President. Will you please come and let us receive her this morning for what a wonderful job you have done and you have served with distinction as well, and we celebrate and salute you this morning. Can we applaud the other members of Congress (inaudible) (clapping).

REP. CAROLYN CHEEKS-KILPATRICK: Giving honor to God who's the head of my life, present protocol being established, but I've got to say in comfort even given that. To Fay and Karl, really (inaudible) really from the bottom of all of our hearts, I cannot be this without you. Thank

you very much. We could (inaudible) ever week in our Washington offices and that's how we keep up with the Caribbean. If not for the newspaper, there would be no association that we could actually see and know what's going on and how we plug in. So thank you very much from the bottom of my heart. Thank you very much.

Commissioner Wescott-Williams, as well as all commissioner's who are here, St. Maarten, one more time. Thanks for hosting us. We love you. Thank you very much.

I bring you greetings from the Congressional Black Caucus, where I chair 43 members. We come from 21 states. We represent over 40 million Americans, 5 full mini chairs, 17 subcommittee chairs, and others like the majority whip and Jim Clyburn from South Carolina, and others who helped to control the Congress. We have the first African doctor in the house, a member of our caucus, who chairs our health brain trust and very instrumental in being here. As being here, won't you welcome my sister back, your Congresswoman Donna Christensen? Thank you, Donna. We love you.

It was mentioned earlier that, I'm going to say who else is here, you heard from Donald Payne, and I know if he's hear in this room, you will hear from him again. You did last night. He chairs our Western Hemisphere Committee. Bennie Thompson, who's here, and I think he came through last night, he chairs our Homeland Security Committee. Also will be here. Sheila Jackson-Lee from Houston, Texas. I know many of you know her. En route, she will be here just shortly. Our number uno congressman, second only to John Conyers in seniority, from the great State of New York, Chairman of the House Ways and Means Committee, our big brother. Charlie Rangel, will be here this afternoon.

What you probably don't know is that the federal budget is \$3 trillion dollars. Charlie's committee handles \$2 trillion of that for Medicare, Medicaid, for veteran's programs. His committee is the committee that produces the revenue, \$2 trillion of that given out in what we call, "entitlements" to those programs. I serve on appropriations, where the committee spends the money. I like that too. We spend a million. Charlie generates it and gives it out by formula to the entitlements. Our committee handles the appropriations and sends them out. Together we make up the Congressional Black Caucus.

As it was said earlier, many more members will be coming and have come over the years, but I just wanted to say, a point of personal privilege. This last 6 months, the last 2 months, and the last 2 weeks. Members of the Congressional Black Caucus have been criss-crossing America for our now president, Senator Barack Obama. Even as we had our own election. Tuesday, August 4th, we were all on the ballot as well, but ours wasn't as significant as relates to us as major, but most of us went to many states all over this country. You see, 18 of our members represent less than 50% African-American. Three of our members represent less than 15% African-American. The most that any of us represent is 62% African-American. So we represent all of America: Asians, Africans, Latinos, Europeans, Native Americans. You name it.

We're called the Conscience of the Congress and we really are that. You know. God built us in a certain kind of way. We got some of this stuff in us, as you do with you. Across ethnic lines, it makes us stand up for righteousness, speak up on injustices, and when we see something wrong,

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you have to hear it because, of course, we're the Conscience of the Congress. So the disparities that Donna, Congresswoman Christensen, talks about in health care, it's real. They have more because we have less. We hope and we know that with President Obama, yes we have some difficult times and the Mayor laid them out well. And to the sponsors by the way, all of you all. We couldn't do this, be with you, help Karl if you weren't here with us. We say, "thank you very much. You are so important". All the sponsors. Thank you very much.

So as we move through these next 4 years, 2 months, 32 days, talk about the short period between November 5th and August 20th. President Bush is still the president. Our constitution says that if there is unrest or malice or whatever, the sitting president can hold off and not let happen the 20th day. There are few people that know about that. So we don't want any, we were kind of scared about November 4th when we won. We wanted everybody to do prayer. There will be a tone-in and have fun, and all that. Don't burn nothing down. Don't burn up a car and all that because they're waiting. Some people are waiting. Some people are very angry. We are euphoric. God is euphoric and people across ethnic lines, you saw them. The multi-cultural facets of America happy because it was a perfect storm. Financial markets crashing. People losing jobs. Health care unaffordable. Our schools in shambles. Big bad America and we still are; it's just this 8 years we have a man in the White House who knew not Joseph. In his leadership of our country, he not only decimated America, but caused havoc around the world. I know you know that.

So we've got a lot of building to do. What Karl and Fay has done is to energize each of us so we take our rightful places. All of you and all of us together. I'm going to bring into this room 2 of my sisters who we lost over the last year. Congresswoman Stephanie Stubb-Jones, Cleveland, Ohio, will be right here. Right over here, smiling and said 'Let's do this'. I want you to give a shout-out for Stephanie. She's up in here right now. Congresswoman Juanita Milligram-McDonald from Los Angeles, also with the ancestors are up in here right now. Both chair people I might add. Congresswoman Stephanie Stubb-Jones (sp) of our Ethics Committee and Congresswoman Juanita (inaudible) McDonald of our House Administration Committee. Finally, all during this tenure, 2 years is what Congress is, this is the 110th congress. So many historical things have happened that I mentioned to you already, including electing our first African-American president. Then finally Julia Carson from Indianapolis, Indiana, also (inaudible) has been to this conference many many times.

So my brothers and sisters across racial, ethnic gender, geographic, biological, (inaudible) we have much work to do, but it can be done. Because I believe there is a higher power who's directing all of this. We just have to know it and believe it, and do it, and be centered in a higher power.

So as members of the Congressional Black Caucus, as we go back next week to address the financial crisis. You all have been hearing about this \$700 billion, every time I say it, we handle a trillion, our committee, \$700 billion is what we just gave out or given out as we speak. The good thing about that, they were trying to give it all out, \$300 billion of it is gone, but the good news, the new president, anything they put in force, he can pull it back. So we have an opportunity to do some real comprehensive stuff.

The housing market? No more foreclosures. Those same people who got the \$700 billion, they were the ones who caused 80%, 85% of the foreclosing. Do you all know that? Predatory lending.

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Loss of jobs. Shifting our jobs over seas. You see, when the financial people do their thing, (inaudible) a billion here and here. It's paper. It's two clicks of the mouse. They were selling bad paper then and they were making big money. My sister, Susan. Let's give Susan a hand. Essence Magazine. Love you girl. (inaudible). We have to be smarter and better as we go forward. Senator Barak Obama, and you may have heard about his prudent campaign. Most of us in this room a 1-1/2 or 2 years, we thought it couldn't done, because we lived with the same people who had to do it. But the perfect storm. Don't forget that. The perfect storm caused by humans. Greedy humans in many cases.

I do a lot of work in the Middle East; Egypt, as well as Lebanon. I do (inaudible) and they're great people, but this president castigated Arabs. In Michigan, where I come from, and John Conyers, we have the largest population of Arabs outside of the Middle East. They've been in our community for decades. They go to our schools. Our children know them. They help and help to build the community. Yes, there are a few bad ones who blew up some (inaudible). God took care of them. They're going to be taking care of. But just like we don't want everybody to measure African-American by a few who do bad things, there are good things in all people. I believe that as President Obama comes into fruition, a member of the Congressional Black Caucus, his job, and he really does believe this, is to bring the races of God's people together. Whether you know God as God, or Allah, or Jehovah, or what have you, that if you really believed in a higher power, let's get busy and rebuild the world.

So, my brothers and sisters, we got a lot of work to do and you do as we go back to New York. Keep the (inaudible) operating. Keep your will strong and knowing that, as president takes his oath and pray that nothing happens between November 5th and January 20th. He can call marshal law. He can go around the country and lock up heathens and Christians, which isn't going to happen. Lock up anybody who might be subversive or such. Create an environment so that January 20th may not ever happen. That's the nightmare. Now snap back. Wake up. He won. It's going to be all right. Let's build a new America again. Let's make sure that our children can have adequate education because it's no longer Michigan against Indiana or Ohio, Michigan against China. It's US against the world and we can build those partnerships the way we do with Faye and Karl, and all of us who have been working for all of these years.

Thirteen is a significant number in the Bible. Thirteen is a number that renews us, gets us ready for the next state of our development. So as we meet here in beautiful St. Maarten, let us rededicate ourselves to a higher power to each other, to knowing that we can do anything but fail. God bless you. (clapping).

REV. DR. SUZAN JOHNSON COOK: Now that's a sister who's got it going on. Thank you so, so much, Congresswoman, Madam President of the Congressional Black Caucus. We can see why. Amen. We are looking forward to great things ahead and you have us as the wind beneath your wings. All of you Congressional Black Caucus members, we are with you so much. Let the church say, "Amen".

We just want to share with you before we present our next speaker. This evening, our host country is going to present us with a fantastic affair. It's going to be offsite and we hope you won't miss it. Transportation is going to be coordinated and we are going to ask that you meet in the lobby at 6:15

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tonight. The transportation will be coordinated by our local government. It's a casual event. It's a beach site affair tonight and we're asking all conference attendees to gather at 6:15 sharp in the lobby for departure. So that's our night affair tonight and we will repeat that announcement throughout the day. If you will just please make note of that as we go forward.

We've heard from the city level. We have heard from the federal government. You know, we are so excited about our first African-American president and many of us also wanted a woman in and it was not a woman's time. It was time for Barak Obama, but in this country, it is a woman's time. As the commissioner who is the leader of government for St. Maarten. Come on somebody. It is Commissioner Sarah Westcot-Williams, our host. She has been gracious. She is elegant. She is eloquent and we are excited about being received by her today. Commissioner Sarah Westcot-Williams. (clapping)

COMMISSONER SARAH WESTCOT-WILLIAMS: Thank you reverends and a very good morning. There's another way to deal with the selfish (sp) protocol and that is by saying, "Welcome friends to St. Maartens". I can say this notwithstanding the many luminaries in our midst because it is truly a welcome to old friends and new acquaintances.

This conference, at this time, on this island, would not have been possible if it was not for the resoluteness and conviction of Mr. and Mrs. Rodney. It was 6 years ago that many of you were here on St. Maarten for the conference as well. It is with a lot of confidence that last year, I threw out the idea of why not again St. Maarten., has been at that time five years ago. This year, it is six years ago. It was only after throwing it up as we sat down to plan, I realized that this conference would have been held two days following the most important election in modern times of the United States of America. As we, Commissioner Malven (sp) and myself visited Karl and Fay in New York, I said to him, "Karl, as much as I want this conference on St. Maarten, I don't know if the timing is right." He said without being presumptuous about the outcome of the election, he said, "Oh no. I believe the timing is right". And with a glee in his eyes, I suspected that he was counting on a victory and a big one, and felt that St. Maarten would be a place where we could celebrate that victory.

This small island of ours, and I'm aware of the clock just in case I was to get any sign from the back, but this small island of ours, only 37 square miles and that is both sides of the island, tonight you probably would understand. You will get to know how we share the island, but I can tell you that St. Maarten is the smallest side of the two. Nevertheless, we accommodate close to two million tourists annually on this island. Approximately 1.3 million visit our island by cruise and the others come here to stay over with us, relax and enjoy our island. And yes it is so opportune and truly a region in transition.

Throughout this region, every island, every island nation, every country, is going through some sort of transition. For St. Maarten itself, we are going through a major constitutional transition. Moving from what others term as called an island territory, a remnant of a colonial system, to that of country within the kingdom of the Netherlands. The French side, just last year, moved from a French municipality to what is called in their terms, "a collectivity". So yes, this region is truly in transition and change is all around us. This side is so important for the relationships between the

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United States of America and the Caribbean region. I am again so thrilled to hear so many of you speak of kinship, relationships, and ancestry as you recognize this region for what it is.

Term water (sp)? Yes. Maybe, but definitely a part of the United States of America. However you take it or twist it. The Diaspora of the West Indies and the United States of America. It's big. It is great and we need to continue to recognize that forging those relationships strengthen it year after year through this conference call is extremely important. As if it wasn't enough to realize that we were going to start a conference two days after such an important election, just barely three weeks ago, St. Maarten was brushed by Hurricane Omar, a category 3 hurricane. So if you were around and you noticed that the scenery is not exactly what you expected of it, if you feel a little in the roads as you go from place to place, recognize that that is what had happened. But Karl decided the conference was going to go on and the conference will go on, Karl, right here in St. Maarten.

So tonight it is my pleasure to host you at another side of the island because you are here two days after the election, two days after a historic election, and yes, notwithstanding the turmoil and the challenges, President Barak Obama is going to face, the party too will continue and the party on St. Maarten will continue this evening on the other side of the island hosted by the Government of St. Maarten. I encourage you and those who are part of the latest workshop this afternoon, to do it well, right, and try to get out as soon as possible so that we can move from here in a timely fashion and the police escort will only be something to show you how proud we are of having all of you here. But we will get to the other side of the island nicely, on time. A region in transition. Thank you for being here at this time in your history and in our history.

I welcome all of you and it is wonderful to be able to open this conference in a time like this because it is for such a time that you are here and we are here, and it is such a time that President Barak Obama was chosen to lead the United States of America and, with that leadership, to be the leader of the free world. If, just if, approximately 40,000 more persons voted could have given him even more votes, he would have had those from right here on St. Maarten, the friendly island of the early (inaudible). So today, we too rejoice with you and we too are hopeful that the change that is coming will be a good one for all of us. We just hope that some of that invigoration and renewed energy that we all will get from this conference will serve you well, when you go back and will serve us well as we continue to build our island nations from strength to strength and with God, all things are possible. Have we not seen that on November 4, 2008. What a wonderful way to celebrate and, Karl, what a wonderful thing to happen (inaudible) St. Maarten and deciding the conference welcomes the 13th Annual Multi-National Caribbean Business Conference. Thank you. Welcome. Enjoy it and may God continue to bless you richly. Thank you.

The question was how casual can you be tonight? You be as casual as you feel comfortable on an island that is your host. So men, absolutely no jacket and ties. I would not recommend that, but be as casual as you've been comfortable. Thank you.

REV. DR. SUZAN JOHNSON COOK: All right. This is where we break. Hold on. We have (inaudible) ceremony. If you will just wait for us please. We're going to invite all of the sponsors and the elective officials to please join the Rodneys as our host today, here up front for our ribbon cutting ceremony. All of our sponsors, all of our elected officials that are present, please come and

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join us up front. Those who are our speakers this morning, please right here in the front of the stage, and we will be lead. All rise. (singing)

END TRANSCRIPT

09-4403 0058

Exhibit 4

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re: Representative of Citi
Review #: 09-2567; 09-4403; 09-3698; 09-6333; 09-2222
Date: March 17, 2009
Location: AkinGump NYC - 399 Park Ave, New York, NY
Time: approximately 2:00 to 4:00 p.m.
Participants: Leo Wise
Omar Ashmawy

Summary: The Representative of Citi was the Citi employee who managed their donation to the Thirteenth Annual Multinational Business Conference. The OCE requested an interview with the Representative of Citi and he consented. The Representative of Citi made the following statements in response to questioning:

1. The Representative of Citi was given an 18 U.S.C. § 1001 warning and consented to an interview. The Representative of Citi signed a written acknowledgement of the warning [attached],
2. The Representative of Citi was laid off from Citibank on December 15, 2008. At the time he was laid off he was Community Relations Officer for Brooklyn and Staten Island
3. The Representative of Citi joined Citi in December 2003. He had previously worked for Chase in a similar capacity. Chase sponsored previous Caribbean Multinational Business Conferences. The Representative of Citi attended the conference when he was at Chase. Chase was the first financial institution to act as a sponsor at the conference.
4. When he came to Citi, he was told to "lead the charge" in terms of Citi's participation in the conference. His superiors made the decision that Citi should participate.

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

5. The Representative of Citi's direct supervisor was Eileen Aulden, New York State Director; she reported to Kathy Ebanks, Regional Director. Eric Eve, Senior Vice President for Community Relations headed the Representative of Citi's department. Mr. Eve made the decision to support the conference and decided on the dollar amount. The Representative of Citi was in charge of managing Citi's participation.
6. Citi donated \$75,000 to support the conference. Citi was the only "senior" sponsor. The money was specifically for the conference. Citi did not put any specific restrictions on how the money could be used to support the conference. The check came from Citi's sponsorship budget and was either made out to the Carib News or the Carib News Foundation.
7. In previous years the amount Citi donated was less. In 2007 it was \$50,000.
8. Karl Rodney chose the location of the conference. Governments in the region made bids to host the conference.
9. The only person from the conference that the Representative of Citi dealt with was Rodney. The Representative of Citi met with Rodney on 5 occasions between May and November 2008. These meetings concerned the program at the conference and Citi's participation in it. These meetings were not about the amount of Citi's sponsorship or to negotiate that in any way. The Representative of Citi described this interaction as a "dialogue" with Rodney. Rodney was receptive to suggestions about the program.
10. At these meetings the Representative of Citi would tell Rodney how he would like to "position" Citi at the conference. Citi participated in the luncheon, with Eve as a keynote speaker, and in workshops that fit their business. The lunch topic was set by Rodney. The Representative of Citi then tried to "position" Eve in a complimentary way. The Representative of Citi recalls suggesting to Rodney that Citi could do a workshop on financial education.
11. Rodney did not present a written agenda for the conference before any of their 5 meetings. The first time the Representative of Citi saw a written agenda was a week or a week and a half before the conference began in early November. The Representative of Citi recalls seeing a draft agenda. He was shown the draft agenda submitted to the Committee on Standards of Official Conduct [attached as Exhibit B] and said he saw some version of the draft agenda but not this specific one. He did recall seeing the panel entitled, "Creative Financial Solutions" on page 9 of Exhibit B. He said when he saw

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

- that panel he thought he could participate in the panel and talk about foreclosures. He “vetted” that topic internally at Citi and then proposed it to Rodney and Rodney agreed.
12. The Representative of Citi attended the dinner on Thursday night. He does not recall Congressman Payne speaking.
 13. The Representative of Citi participated in the ribbon cutting with members of Congress, host government officials and major sponsors on the Friday morning of the conference. The Representative of Citi got sick on Friday and missed the evening event.
 14. Eve did not have a sit-down meeting with the members of Congress in attendance to the Representative of Citi’s knowledge.
 15. The Representative of Citi did not have more than “cursory” conversations with the Members of Congress who attended. He saw all members that attended more than once. He saw most of them on Friday and had seen everyone by Saturday.
 - a. The Representative of Citi recalled Congressman Rangel was there. The Representative of Citi thought he first saw him on Friday and saw him on Saturday. The Representative of Citi thought he saw him at different events.
 - b. The Representative of Citi saw Congressman Payne on more than one occasion.
 - c. The Representative of Citi saw Representative Kilpatrick early on Friday. He does not recall her speaking.
 - d. The Representative of Citi saw Representative Thomson on Thursday; he saw him on more than one occasion.
 16. 300 to 350 people typically attended the event. It was open to anyone.
 17. The conference was billed as the Carib News conference. Rodney is the publisher and CEO of the Carib News. In May or June one would start seeing advertisements for the conference on the back page of the Carib News. The Representative of Citi thought Citi’s check went to the Carib News Foundation but did not know what the Foundation did other than the conference. The Representative of Citi thought the conference was “totally” financed by the sponsors. He did not know if Carib News put up any money for the conference.

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18. The Representative of Citi said Rodney saw the conference as an opportunity to position the Carib News as the "voice of the Caribbean" which is how the paper markets itself in New York.
19. Citi saw the conference as offering Citi three benefits: (1) it sent a message to their partners; (2) it was a business opportunity; and (3) it was good for Citi's image.
20. The members of Congress lent the meeting "clout."
21. Sponsors also bought ad space in the Carib News. This was not part of their sponsorship of the conference. Citi bought ad space in the Carib News.
22. The Representative of Citi also knows Rodney from the Board of the University of the West Indies. Both he and Rodney are members and participate in telephone meetings and, occasionally, in in-person meetings.

We certify that this memorandum contains all pertinent matter discussed with the Representative of Citi on March 17, 2009.

Leo J. Wise
Staff Director & Chief Counsel

Omar Ashmawy
Investigative Counsel

OFFICE OF CONGRESSIONAL ETHICS
U.S. HOUSE OF REPRESENTATIVES

18 U.S.C. § 1001 ACKNOWLEDGEMENT

I have been provided with a copy of the text of section 1001 of title 18, United States Code (popularly known as the false Statements Act) and hereby acknowledge that it applies to any testimony or documents I provide to the Office of Congressional Ethics.

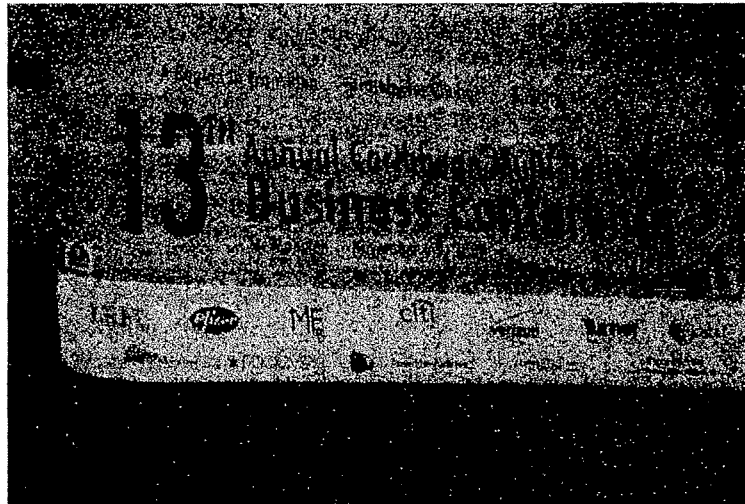
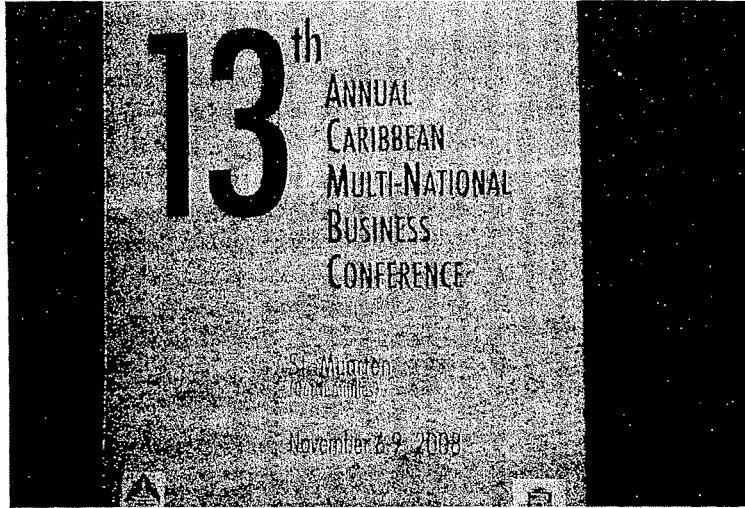
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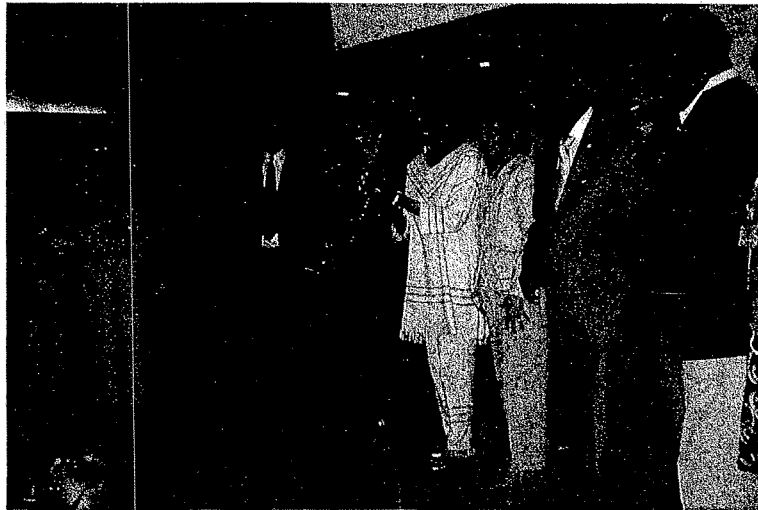
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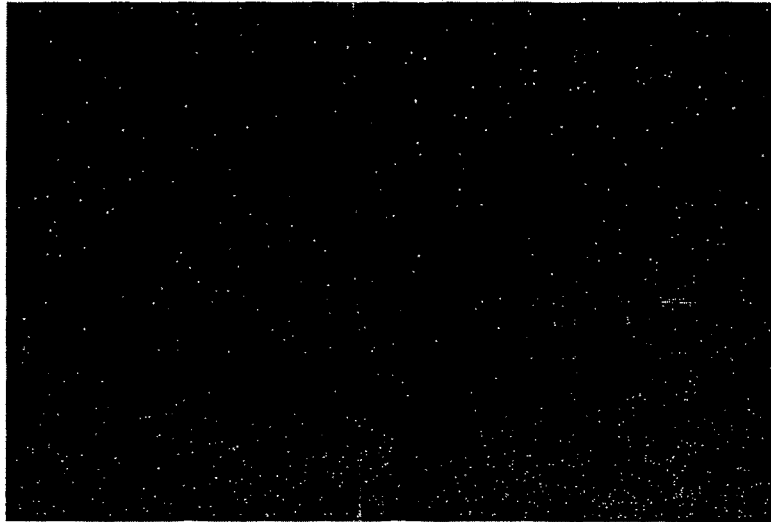
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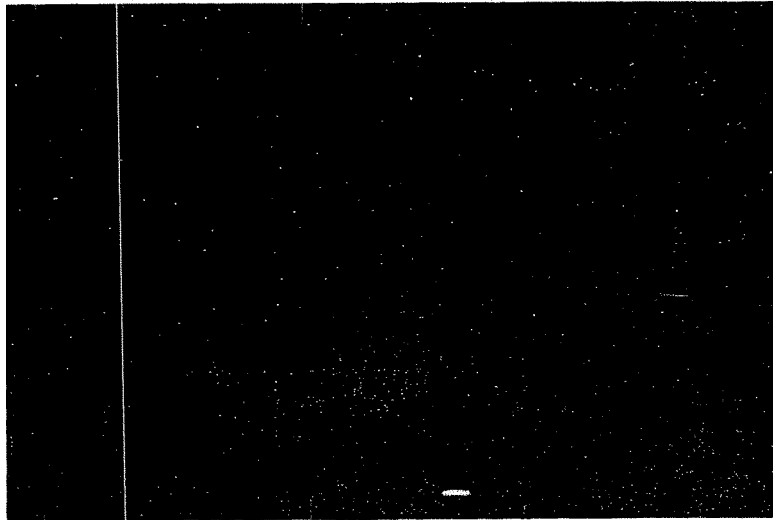
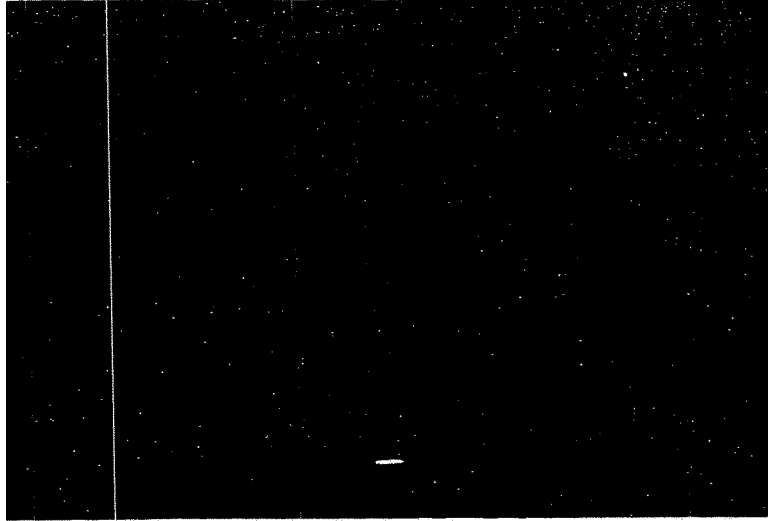
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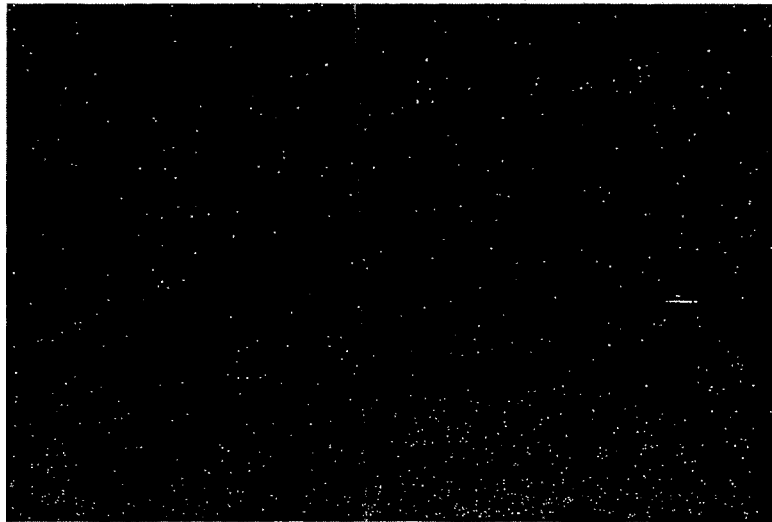
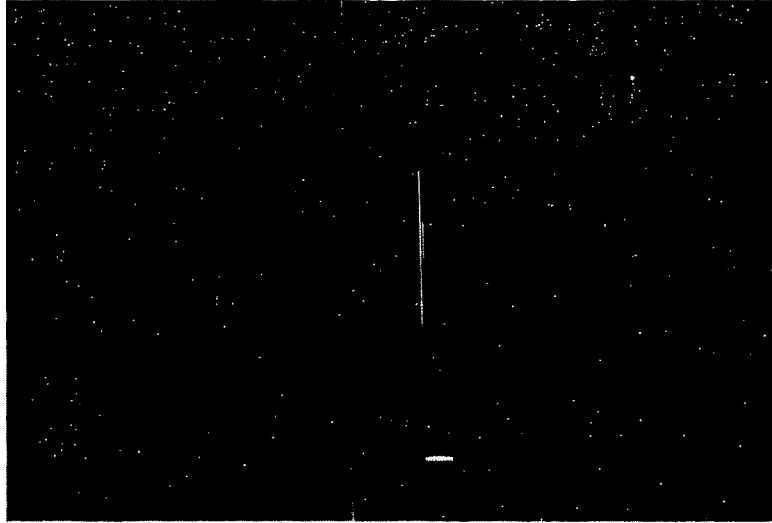
Exhibit 5

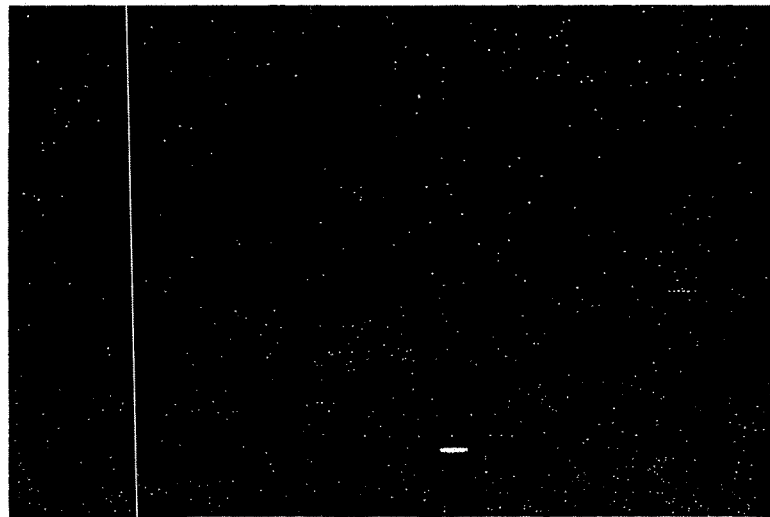
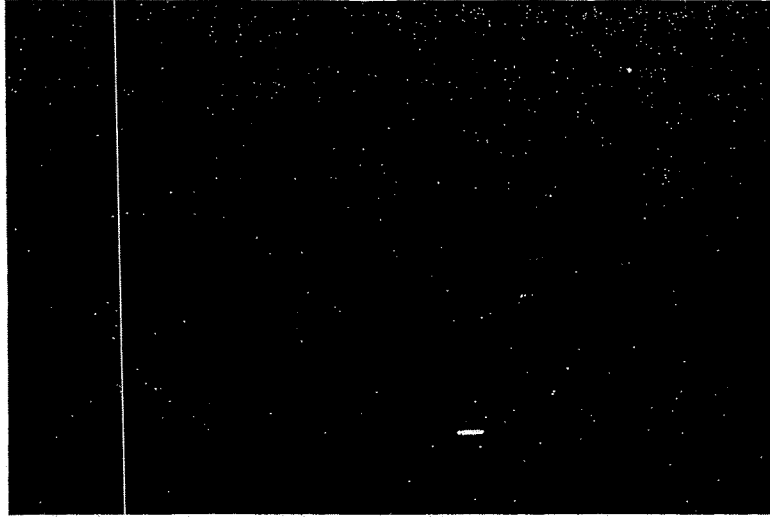














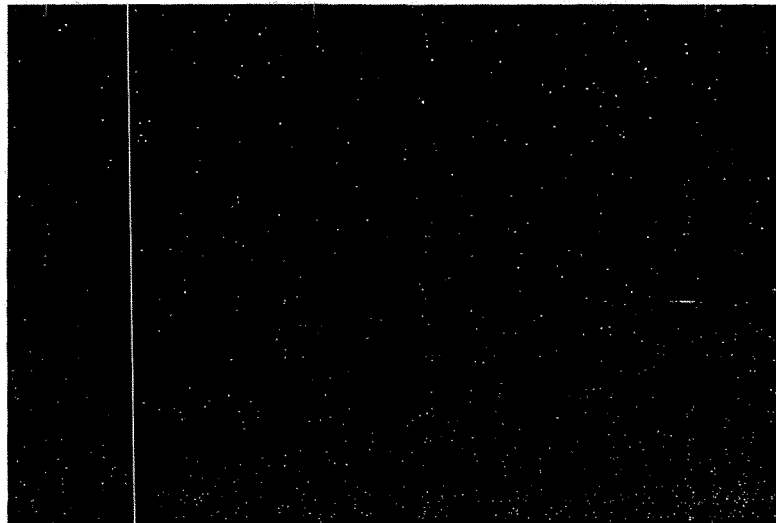




Exhibit 6

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STROOCK

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May 18, 2009

BY EMAIL AND REGULAR MAIL

Mr. Leo Wise
Staff Director & Chief Counsel
Office of Congressional Ethics
United States House of Representatives
1017 Longworth House Office Building
Washington, DC 20515

Re: Request for Information, Review No. 09-2567

Dear Mr. Wise:

In response to your request for our clients' voluntary cooperation regarding your office's questions pertaining to the Thirteenth Annual Caribbean Multi-National Business Conference (the "Conference"), we submit the following responses. Based upon our review of the questions and our multiple conversations with your office, we believe that these responses contain the information that you are seeking. As with our previous production, to the extent that the Freedom of Information Act is applicable to any submissions made to the Office of Congressional Ethics, our clients hereby request that the information provided be treated confidentially.

The Host country participated in the Conference as follows: (1) developed local Host Committees to facilitate local planning, (2) helped to negotiate the rate with the hotel, (3) assisted in developing the theme of the Conference, (4) assisted in identifying local speakers, including the Leader of Government, (5) assisted in local publicity, (6) provided local entertainment, including a school choir and cultural items, (7) arranged Host Country Evening on Friday, November 8 (the group was transported to another property for refreshments and entertainment), (8) helped with local transportation for some Carib News employees and helped arrange accommodations for some guests (not paying for such accommodations), (9) participated

09-4403 0076

Leo Wise, Esq.
May 18, 2009
Page 2

as event Speakers, and (10) issued invitations to attend to specially invited guests. The Host Country provided no funds towards the cost of the Conference.

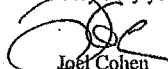
The cost for members of the public to attend the conference for the four days and three nights was \$840.00 for double occupancy or \$1085.00 for single occupancy. The cost of attendance covered room accommodations, meals, and admission to the Conference presentations.

The attending Members of Congress participated in sessions relevant to their Committee assignments in Congress and demonstrated interest in a particular subject matter. For example, Congressman Bennie Thompson spoke at presentations on Hemispheric Security and Immigration/ Deportees, Congresswoman Donna Christensen spoke at a Town Hall Forum on Health, and Congressman Charles Rangel spoke at presentations on Haiti and the Caribbean, and the current crises facing them. In addition, all of the Members of Congress participated in a session with the local Ministers of Government to discuss issues of interest to the Caribbean region. Though correspondence with the Members of Congress indicated that a memo of the Closed Door Session would be distributed after the Conference, no such memo was ever drafted or distributed.

The total cost of the Conference approached \$300,000. These costs included direct expenses such as travel, event planner fees, local staffing, and hotel payments, as well as Carib News operating expenses for the purpose of the preparation and implementation of the Conference. The Conference costs were paid using (1) registration fees by the attending guests, (2) contributions from corporate participants, some to Carib News and others to Carib News Foundation, and (3) general funds of Carib News. Each of three sources of funding was pooled together to pay the various expenses.

If you have any questions regarding this information, please do not hesitate to call.

Very truly yours,



Joel Cohen

and



Danielle Alfonzo Walsman

09-4403 0077

Exhibit 7

AKIN GUMP
STRAUSS HAUER & FELD LLP
Attorneys at Law

STEVEN R. ROSS
202.887.4343/fac: 202.887.4288
sross@akingump.com

March 31, 2009

Mr. Leo J. Wise
Staff Director and Chief Counsel
Office of Congressional Ethics
1017 Longworth Building
Washington D.C. 20515

Re: Citigroup, Inc. Production

Dear Leo:

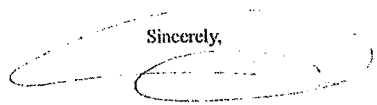
On behalf of our client, Citigroup Inc., we are providing you with two documents in response to your oral request of March 17, 2009. Please find a copy of a solicitation letter to support the 2008 Caribbean Multi-National Business Conference, dated April 4, 2008, from Carib News Foundation to our client. In addition, please find a copy of both the front and back of check number 5006611264, dated June 13, 2008, payable to Carib News Inc. in the amount of \$75,000.00. A search of our client's records has not uncovered any evidence of a receipt being provided for the above-mentioned check. We will produce this document should it be identified.

The documents we are producing today are confidential and proprietary in nature, and have been marked accordingly. We ask that these documents be kept confidential by your Office and your staff. Notwithstanding our request that these documents be kept confidential, due to their sensitivity, we ask that your office or staff provide us with notice and an opportunity to be heard before disclosure of any information from these documents to any third parties.

In addition, we are providing you with an original signed document of Michael Flanigan dated March 23, 2009, acknowledging the False Statements Act.

Please let me know if you have any questions.

Sincerely,



Steven R. Ross

09-4403 0079

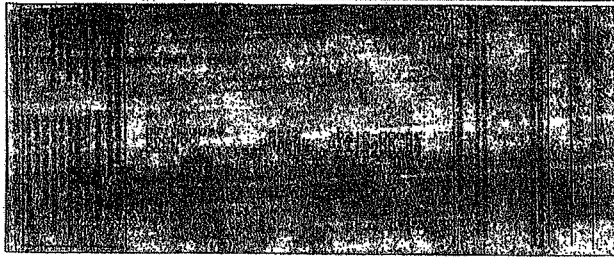


Citi Check Image Delivery

- Print
- Close Window
- Check Image Inquiry Results

Account #	Check #	Amount	Paid Date
0000038853877	5006611264	\$75,000.00	06/24/2008

		CREDIT SERVICES CREDIT CENTER, 6-3-1 CREDIT SERVICES (614) 469-4121	02-20 311	No. 038853877 Date: 13-JUN-2008 Vendor No. 206513
CARDI NEWS INC 1560171835 07 062308 CHARGE 7 WEST 36TH STREET 6TH FLOOR NEW YORK NY 10018		75,000.00 NOT VALID AFTER 180 DAYS		<i>Andrea Hamilton</i>
SEVENTY-FIVE THOUSAND AND 00/100 DOLLARS				
CITI GROUP BANK, A SUBSIDIARY OF CITI GROUP ONE PENN PLAZE, NEW YORK, NY 10038				
5006611264 40811002092 38853877* *0007500000*				





Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10018
Tel: (212) 944-1991: Fax: (212) 944-2089
E-mail: info@caribnewsconference.com

April 04, 2008

Mr. Eric Eve
Senior Vice President
Community Relations
Global Consumer Group
Citigroup Inc.
850 Third Avenue, 12th floor
New York, NY 10022

Dear Mr. Eve: *Eric*

For the past twelve years, the annual Caribbean Multi-National Business Conference has been instrumental in encouraging investment, cross-border trade and business partnerships, the role played by executives of major corporations, medium and small-size businesses and entrepreneurs, and deepens the connections with key elected officials.

Your support and that of *CITI* went a long way to make the Conference a success, and has fostered on-going growth in business achievements and impactful policy decisions. We appreciate your encouragement, your personal participation, and the very stature your presence brings to the Conference. We do get concrete results and expressed appreciation of new opportunities.

We can assure you that all the key stakeholders, Members of Congress, Heads and Ministers of Government, Elected Officials, Community and Business Leaders are all aware and appreciative of yours and *CITI'S* participation in this very important mission.

This year, the Thirteenth Annual Conference is scheduled to be held in St. Maarten, November 6 - 9, 2008, and promises to further strengthen and expand on the work done by many of the Caribbean countries developing economies, in collaboration with the emerging markets initiatives in the U.S. The quality of the sessions and the high level of participation is now legendary, and is anxiously awaited each year.

Enclosed is a Power Point presentation of the sponsorship opportunities the Conference provides, and also a program and recap of the 2006-2007 Conference. We know of your interest to deepen the *CITI* local, regional and global connections, and I know the Conference can achieve that. It is our sincere wish that this presentation motivates your sponsorship.

Organized by Carib News Foundation. A non-profit project 501-C3 corporation

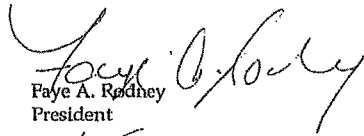
09-4403 0081

We would be happy to answer any questions you might have or to fill in any detail. I can be reached by e-mail: KBRodney@nycaribnews.com or (212) 944-1991.


Because we know of your busy schedule, I will also follow up with your office to ascertain interest level.

Thanks for your kind consideration.

Best regards,



Faye A. Rodney
President



Karl B. Rodney
Publisher/CEO



OPENING THE REGION
INVESTMENT & BUSINESS OPPORTUNITIES

BUILDING THE GLOBAL NETWORK
GOVERNMENT LEADERS - ELECTED OFFICIALS
IMPACTING ECONOMIC POLICIES

PARTNERSHIPS
CORPORATE EXECUTIVES - SEEKING
EXPANSION & GROWTH

DOING BUSINESS
TOGETHER



“IMPACTFUL”

EXPERIENCE THE POWER OF THE



**THIRTEENTH
ANNUAL
CARIBBEAN
MULTI-NATIONAL
BUSINESS
CONFERENCE**

**ST. MAARTEN
NOVEMBER 6 - 9, 2008**

BUILDING KEY CONNECTIONS FOR GROWTH



THE MISSION

- ◆ To bring together businesses, community, and government leaders interested in understanding the economic opportunities in the Caribbean marketplace locally and in the Caribbean.
- ◆ To make a global community among Diverse Business entities and The Caribbean.
- ◆ To Link the emerging markets of the U.S and the Developing Economics of the Caribbean and Latin America.

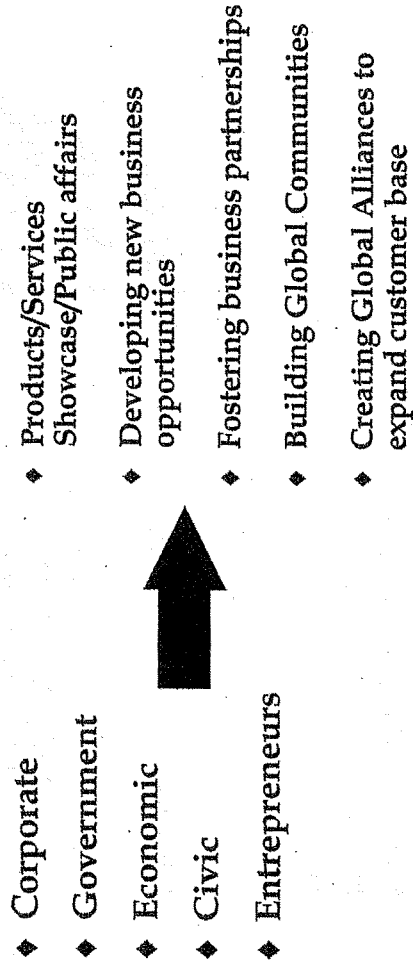


THE OPPORTUNITY

- ◆ **Marketing:** Understanding the market in the US and the Caribbean.
- ◆ **Business development:** Meeting potential customers and potential partners.
- ◆ **Strategic analysis:** Understanding the possibilities of emerging markets in the US and the Caribbean.
- ◆ **Corporate image:** Demonstrating your commitment to the Caribbean Community, and the program of diversity.
- ◆ **Community relations:** Establishing lasting relationships with key community leaders.
- ◆ **Government relations:** Meeting with and discussing topics of interest with significant elected officials from the US & the Caribbean.



STRATEGIC PARTNERSHIPS



THE FACTS

- ◆ 31.9 billion US dollars in foreign investment Came into the Caribbean, up 36 percent from 1996.
- ◆ Tourism is the key economic foundation in the Caribbean. Approximately 11 million cruise passengers a year visit the Caribbean, providing Import/Export Opportunities.
- ◆ The Caribbean, in aggregate, is the 10th largest export market for the U.S., surpassing France and other countries, and providing opportunities for marketplace products.
- ◆ The \$15 billion market of the Caribbean American community and overseas



THE LEGACY

- * Jamaica - 1996
- * Barbados - 1997
- * St. Lucia - 1998
- * St. Croix/USVI - 1999
- * Jamaica - 2000
- * Grenada - 2001
- * St. Maarten - 2002
- * The Bahamas-2003
- * St. Kitts-Nevis-2004
- * ST. Thomas, USVI - 2005
- * Panama city, panama - 2006
- * Antigua & Barbuda - 2007

- * Building Consumers Awareness
- * Developing Working Alliances
- * Reaching Defined Target Markets
- * Making the Right Connections
- * Expanding Diverse Market Places
- * Successful Joint/Ventures
- Successful Regional Investments



THE OVERVIEW

"Some companies have discovered that the Caribbean offers a great deal more than beautiful beaches and sunshine. They have recognized its tactical importance in this era of globalization. We are proud to provide a useful platform for companies that are seeking to sharpen their international competitiveness.

For the past twelve years, the Annual Multinational Business Conference has been creating links between the Caribbean, Central America and the U.S. Usually, during four days of workshops, luncheons and dinners, Caribbean Political Heads of State and Ministers of Government, Members of the Congressional Black Caucus, Local and Regional Politicians, business persons and influential individuals from the U.S. and the Caribbean discuss, interact and network around issues of mutual concern. Relationships are built and business deals are made.

We hope that in 2008 you will join us"



PARTICIPATION

Platinum LEVEL - \$75,000

- ❖ Keynote Speaker at Main Event
- ❖ Sponsor Private VIP Reception and specially arranged forum
- ❖ Special Awards Presentation
- ❖ Display, Exhibition and signage
- ❖ Area of Conference -Reserved for exclusive sponsorship
- ❖ Full page Ad in program
- ❖ Air Transportation for 2 people
- ❖ Accommodations: One Suite and One Standard Room
- ❖ Included in all printed materials
- ❖ Included in Internet promotion
- ❖ Display company logo and link to our website
- ❖ Sponsor of a Gala Event
- ❖ Sponsor and Participate in a workshop
- ❖ Representative listed in program with bio and photo



PARTICIPATION

GOLD LEVEL - \$50,000

- ◆ Sponsor a Workshop
- ◆ Sponsor a Gala Event
- ◆ Display , Exhibition and signage
- ◆ Included in all Printed Material
- ◆ Included in all Internet Promotion
- ◆ Display of Company Logo and Link to Our Website
- ◆ Full Page Ad in Program
- ◆ Representation in the Brochure
- ◆ Air Transportation & room accommodations for 1



1007



PARTICIPATION

SILVER LEVEL - \$25,000

- ◆ Sponsor & Participate in a Workshop
- ◆ Display and Exhibition
- ◆ Banner in Public areas & at workshop
- ◆ Included in all printed materials
- ◆ Included in Radio and TV Promotions
- ◆ Included in the internet promotion
- ◆ Sponsor an event i.e. breakfast, lunch or dinner
- ◆ Full Page ad in program and recap
- ◆ Representatives listed in program with bio & photos
- ◆ Representatives listed in brochure



PARTICIPATION

SUPPORTER

\$15,000

\$10,000

- ◆ Display and Exhibition
- ◆ Banner in Public areas & at workshop
- ◆ Included in all printed materials
- ◆ Included in Radio and TV Promotions
- ◆ Included in the internet promotion
- ◆ Full Page ad in program and recap
- ◆ Representatives listed in brochure
- ◆ Representatives listed in program with bio & photo
- ◆ Display and Exhibition
- ◆ Banner in Public areas & at workshop
- ◆ Included in some printed materials
- ◆ Included in some Radio and TV Promotions
- ◆ Included in the internet promotion
- ◆ Full Page ad in program and 1/2 page in recap
- ◆ Representatives listed in program

1009



Government Participation

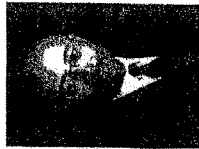
"This Conference is keeping us informed. There would never have been a banana problem had we (CBC) known about the issue before it went to the WTO."
Congressman Charles Rangel



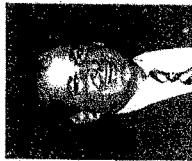
"The Conference in Antigua with Members of the U.S. Congress was very important and extremely vital to both the U.S. and Caribbean interests. It highlighted the need for the Caribbean to pay greater attention to the role of Congress in the formulation of U.S. policy."
*Hon. Balduino Spencer
Prime Minister of Antigua*



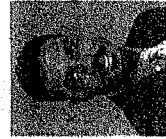
"The conference is central to the promotion of our mutual interests in the U.S. in general, New York City in particular, and the Caribbean. It is essential for all of us to work together to spur economic growth and social expansion at home and in our neighborhoods."
*William Thompson, Comptroller,
New York City*



"The results of the Conference went far beyond our expectations. The process of bringing families together, of sharing a vision for our countries, couldn't have been scripted. The sessions brought out ideas, options and other benefits which should be long lasting."
*Juan Carlos Navarro, Mayor, Panama
City, Republic of Panama*



CORPORATE PARTICIPANTS



Eric Eve - SVP Community Relations, CITIGROUP. "The time is ripe for Caribbean nations to come together and get on "the road," to articulate the strength of their economies and stability of their business climates. The Conference is a great place to start to open clear lines of communication between the private and public sectors of the Caribbean and the U.S."



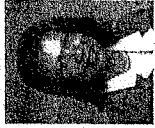
Marilyn Johnson, VP Market Development, IBM Corporation. "IBM and its partner ENI Enterprise Network, through its presentation at the Conference, is taking the audience up through levels of technology, understanding the application of E-commerce. This conference makes a difference in the lives of the attendees."



Karen Boykin-Towns, Senior Director of Public Affairs. "The conference provides an ideal opportunity for Pfizer - it demonstrates its commitment to health forums internationally, but also to network with key decision makers. Collaboration is necessary between the Caribbean to make improvements and adjustments to healthcare and its delivery."



Edward J. Goldberg, SVP Government & Consumer Affairs, MACY'S. "We have whole files of opportunities to build business partnerships in the current corporate environment. The conference is conducive to exploring new areas of business, and we have taken advantage of this to both the region and MACY's benefit."



Marie Long, VP Constituency Relations, AT&T Foundation. "As many of you know, AT&T has changed in the last 5 years. Its growth, dynamism and change have created what some of us call the new AT&T. The real and driving force behind our success as a corporate entity is the culture of inclusion and collaboration. We recognize the great work being done at the conference to improve business and personal lives, exchange ideas, and assist alternative strategies that could lead to technology transfer and to growth."



Javier Eodas, FVP Human Resources, HSBC Bank. "We provide financial services to a vast array of businesses and individuals, and this gives us a unique perspective on different cultures and ways of doing business. We want to engage our partners in mutually beneficial relationships within our communities and that is why we seize the opportunity to link with CARIB NEWS and the Conference. It is a tremendous value to us."

UNIQUE OPPORTUNITIES



Ambassador Andrew Young

"If only the sons and daughters of Africa will remember from whence they came, then our roots should be a constant reminder of who we are and where our countries can go with our input. This is why the Carib News Conference is so important and that is why I support it."



Hon. Percy Sutton

"We badly needed a forum to address the need of us working together. This conference is an excellent idea and we should have been doing this long ago."



Hazel N. Dukes, President, New York State NAACP

"The conferences, presenters and participants have been extraordinary. I have gained tremendous knowledge on the Caribbean Diaspora. I continue to promote and foster relationships with communities here and at home."



Harry Edyfonte, Entertainer

"The Conference is like a table set with a feast of great ideas provided by some of the best minds. The table is set - it is for us to partake!"



David Dinkins, Former Mayor of New York City

"Education is the very key for the development of our people. I have always held that position; that is why I am so pleased to participate in the Education Forum at the Conference. There is an eagerness on the part of the audience to know more about our system. The collaborative effort of CARIB NEWS and the Conference wins my support."



Roy Hastick, President/CEO Caribbean American Chamber of Commerce

"The work of the Conference is legendary in the Caribbean and the U.S. Where else do you find this level of leadership from all sectors coming together to advance doing business. It is the most effective way of building a Global Network."



Susan Taylor, Editor Emeritus, Essence Magazine

"It is always so wonderful to experience the drive, enthusiasm and determination of the Conference participants. It says something wonderful is happening and we all need to step into it. It provides such outstanding opportunities to connect with real people who can make things happen."



Lloyd Williams, President/CEO Greater Harlem Chamber of Commerce

"I have always advocated cross-border business opportunities for the Chamber members, and that is why for the entire twelve years of the conference, the Chamber has made it a priority event. Our members have reaped the benefits and have also made great contributions."

INVEST IN SUCCESS



**A WEEK-END THAT CHANGES
LIVES**

'EXPERIENCE THE POWER'



Exhibit 8

1015

Board
David Skaggs, Chair *Porter Goss, Co-Chair*
Yvonne Burke *Jay Engen*
Karan English *William Frenzel*
Allison Hayward *Abner Mikva*



Leo J. Wise, Staff Director & Chief Counsel
1017 Longworth House Office Building
(202) 225-9739
(202) 226-0997 fax
email address: oce@mail.house.gov
website address: oce.house.gov

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES
WASHINGTON, DC 20515

Mr. Frank Weber
Internal Revenue Service
Freedom of Information Reading Room
1111 Constitution Avenue, NW
Washington, DC 20224

March 31, 2009

Dear Mr. Weber,

Thank you for talking with me this afternoon and for offering to help me with this request. I need to know if Carib News Charities filed a 990-PF for tax years 2006, 2007, and 2008 (I have included tax year 2008 in the event that the foundation filed before the filing deadline). I understand that the organization is not required to file if it did not receive donations in excess of \$25,000. If the foundation has filed a 990-PF for 2006, 2007, or 2008, we would like to have a copy of the tax form(s). In the event that it takes several days, weeks, or months to receive the requested copies, it would be helpful to have an answer to the question whether the organization has filed and for what year(s) tax form(s) exist.

It is our understanding that the organization also does business as Carib News Foundation; however, Carib News Foundation is not found in Publication 78.

My telephone number is 202-225-9739 and my email is Elizabeth.horton@mail.house.gov. Thank you again for your help with this matter.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Horton".

Elizabeth Horton

Form **4506-A** Request for Public Inspection or Copy of Exempt or Political Organization IRS Form
 (Rev. January 2009) Department of the Treasury Internal Revenue Service OMB No. 1545-0495
 ▶ Type or print clearly. Request may be rejected if the form is incomplete or illegible.

TIP You may not have to complete Form 4506-A to get the copies you need.

- **Internet.** Form 8871, Political Organization Notice of Section 527 Status, and Form 8872, Political Organization Report of Contributions and Expenditures, are available for inspection and printing from the Internet. The website address for both forms is www.irs.gov/polorgs.
- **Public disclosure by the organization.** Exempt or political organizations must make their returns, reports, notices, and exempt applications available for public inspection. You can visit the organization to inspect the material instead of requesting it from the IRS. The organization may be able to mail the copies to you.

1 Exempt or political organization. If a multiple request, please attach list of names, forms, and tax years.

Name: CARIB NEWS CHARITIES Employer identification number (if known): 13 : 3632050
 Address: 7 WEST 36TH STREET, FLOOR 8
 City or town, state, and ZIP code: NEW YORK, NY 10018

2 Requester

Name: OFFICE OF CONGRESSIONAL ETHICS Contact person: ELIZABETH HORTON
 Address: 1017 LONGWORTH BUILDING Phone: (202) 225-9739
 City or town, state, and ZIP code: WASHINGTON, DC 20515 Date: 3/31/09

3 Category of requester: Commercial user Non-commercial scientific institution
 You must check a box. Educational institution Media All others

4 Reason for request. All requesters except for commercial users must provide an explanation of how the records will be used to avoid being charged the commercial rate. Attach additional sheets if necessary.
TO CONFIRM WHETHER FOUNDATION RECEIVED FUNDING IN TAX YEARS 2006, 2007, 2008

Lines 5-9. For each applicable form, check the box(es) for the item(s) you are requesting. You may request more than one form. For each form requested, check either the copy, inspection, or CD/DVD box and enter the specific tax year(s), as indicated. If ordering a partial set on CD/DVD, indicate the format, state(s), and month(s) requested.

5 Form 990, Form 990-EZ CD/DVD Format: Alchemy Raw
 Copy Inspection State(s): _____; _____; _____
 Tax year(s) requested: _____; _____; _____ Months: _____; _____; _____

6 Form 990-PF CD/DVD Format: Alchemy Raw
 Copy Inspection State(s): _____; _____; _____
 Tax year(s) requested: 2006, 2007, 2008 (if filed) Months: _____; _____; _____

7 Form 990-T (501(c)(3) organizations filed after 8/17/2006) CD/DVD Format: Alchemy Raw
 Copy Inspection State(s): _____; _____; _____
 Tax year(s) requested: _____; _____; _____ Months: _____; _____; _____

8 Form 5227 Copy Inspection Tax year(s) requested: _____; _____; _____
9 Form 1023, 1024 or Determination Letter Copy Inspection Tax year(s) requested: _____; _____; _____

IRS Use Only

The form requested above was inspected by (name of requester) _____ IRS office where inspection was made _____
 Signature of employee present at inspection _____ Date _____

 **IRS** Department of the Treasury
Internal Revenue Service

OGDEN UT 84201-0058



OFFICE OF CONGRESSIONAL ETHICS
ATTN: ELIZABETH HORTON
1017 LONGWORTH BUILDING
WASHINGTON DC 20515

CUT OUT AND RETURN THE VOUCHER AT THE BOTTOM OF THIS PAGE IF YOU ARE MAKING A PAYMENT,
EVEN IF YOU ALSO HAVE AN INQUIRY.



Handwritten mark

The IRS address must appear in the window.
0412606945

Use for payments

BODCD-TE

Letter Number: LTR3983C
Letter Date : 2009-04-17
Tax Period : 000000

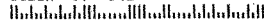


133632050



INTERNAL REVENUE SERVICE


OGDEN UT 84201-0058



OFFICE OF CONGRESSIONAL ETHICS
ATTN: ELIZABETH HORTON
1017 LONGWORTH BUILDING
WASHINGTON DC 20515

133632050 RV CARI 00 2 000000 670 0000000000

09-4403 0102

 **IRS** Department of the Treasury
Internal Revenue Service

OGDEN UT 84201-0058

In reply refer to: 0412606945
Apr. 17, 2009 LTR 3983C E1
13-3632050 000000 00 000
00027842
BODC: TE

OFFICE OF CONGRESSIONAL ETHICS
ATTN: ELIZABETH HORTON
1017 LONGWORTH BUILDING
WASHINGTON DC 20515

Taxpayer Identification Number: 13-3632050
Organization: Carib News Charities, Inc.

Form(s): 990PF

Tax Period(s): May 31, 2006 May 31, 2007
May 31, 2008

Dear Requester:

We received your Mar. 31, 2009, request for a copy of the Form(s) 990PF relating to the organization(s) identified above. Enclosed is a copy of the form(s) you requested. We are unable to provide a copy of the form(s) requested for the following tax period(s):

May 31, 2006

We regret that we can not provide a photocopy of return(s) for the organization(s) and year(s) you requested. There are a variety of reasons why these returns are not available, for example:

- the organization may not be required to file the requested return because its gross receipts are \$25,000 or less.
- the organization may be included in a group ruling and the parent may have filed a group return.
- the organization may have received an extension of time to file.
- processing of the organization's return may not be complete.
- return(s) are destroyed after a certain number of tax years.
- the organization may not be required to file.

If you have any questions, please write us at the address shown at the top of the first page of this letter. Or, you may call us toll free at 1-877-829-5500.

Whenever you write, please include this letter and, in the spaces below, give us your telephone number with the hours we can reach you. Please keep a copy of this letter for your records.

Telephone Number () _____ Hours _____

THIS IS A COPY OF A LIVE RETURN FROM SMIPS. OFFICIAL USE ONLY.

Access as orig

Form **990-PF** **Return of Private Foundation** or Section 4947(a)(1) Nonexempt Charitable Trust Treated as a Private Foundation **2005**

OMB No 1545-0052

Department of the Treasury Internal Revenue Service

Note: The organization may be able to use a copy of this return to satisfy state reporting requirements

For calendar year 2005, or tax year beginning June 1, 2005, and ending May 31, 20 05

G Check all that apply. Initial return Final return Amended return Address change Name change

Use the IRS label. **Name of organization**
Cadb News Charities Inc
Employer identification number
13:3632050

Otherwise, print or type. **Number and street (or P.O. box number if mail is not delivered to street address) Room/suite**
15 West 39th Street 13
Telephone number (see page 10 of the instructions)
()

See Specific Instructions. **City or town, state, and ZIP code**
New York, NY 10018
City or town, state, and ZIP code
New York, NY 10018

H Check type of organization: Section 501(c)(3) exempt private foundation
 Section 4947(a)(1) nonexempt charitable trust Other taxable private foundation

I Fair market value of all assets at end of year (from Part II, col. (c)) Other (specify) Cash Accrual
 line 16 \$ (Part I, column (d) must be on cash basis)

J Accounting method: Cash Accrual
 (Part I, column (d) must be on cash basis)

E If private foundation status was terminated under section 507(b)(1)(A), check here
 F If the foundation is in a 60-month termination under section 507(b)(1)(F), check here

Part I Analysis of Revenue and Expenses (The total of amounts in columns (b), (c), and (d) may not necessarily equal the amounts in column (a) (see page 11 of the instructions))		(a) Revenue and expenses per books	(b) Net investment income	(c) Adjusted net income	(d) Disbursements for charitable purposes (cash basis only)
1	Contributions, gifts, grants, etc., received (attach schedule)	0			
2	Check <input type="checkbox"/> if the foundation is not required to attach Sch B				
3	Interest on savings and temporary cash investments				
4	Dividends and interest from securities				
5a	Gross rents				
b	Not rental income or (loss)				
6a	Net gain or (loss) from sale of assets not on line 10				
b	Gross sales price for all assets on line 6a				
7	Capital gain net income (from Part IV, line 2)				
8	Net short-term capital gain				
9	Income modifications				
10a	Gross sales less returns and allowances				
b	Less: Cost of goods sold				
c	Gross profit or (loss) (attach schedule)				
11	Other income (attach schedule)				
12	Total. Add lines 1 through 11				
13	Compensation of officers, directors, trustees, etc				
14	Other employee salaries and wages				
15	Pension plans, employee benefits				
16a	Legal fees (attach schedule)				
b	Accounting fees (attach schedule)				
c	Other professional fees (attach schedule)				
17	Interest				
18	Taxes (attach schedule) (see page 14 of the instructions)				
19	Depreciation (attach schedule) and depletion				
20	Occupancy				
21	Travel, conferences, and meetings				
22	Printing and publications				
23	Other expenses (attach schedule)				
24	Total operating and administrative expenses. Add lines 13 through 23				
25	Contributions, gifts, grants paid				
26	Total expenses and disbursements. Add lines 24 and 25				
27	Subtract line 26 from line 12:				
a	Excess of revenue over expenses and disbursements	0			
b	Net investment income (if negative, enter -0-)				
c	Adjusted net income (if negative, enter -0-)				

For Privacy Act and Paperwork Reduction Act Notice, see the Instructions. Cat No 11285X Form 990-PF 2005

SCANNED JAN 15 2008

04232004 22:59:05

RECEIVED IN CORR
 IRS OSC -645
 AUG 27 2007
 OGDEN, UTAH

09-4403 0104
 6,13 12

THIS IS A COPY OF A LIVE RETURN FROM SMIPS. OFFICIAL USE ONLY.

THIS IS A COPY OF A LIVE RETURN FROM SMIPS. OFFICIAL USE ONLY.

Part II Balance Sheets		Attached schedules and amounts in the description column should be for end-of-year amounts only (See instructions)			
		Beginning of year	End of year		
		(a) Book Value	(b) Book Value	(c) Fair Market Value	
Assets	1	Cash—non-interest-bearing	0		0
	2	Savings and temporary cash investments			
	3	Accounts receivable			
		Less: allowance for doubtful accounts			
	4	Pledges receivable			
		Less: allowance for doubtful accounts			
	5	Grants receivable			
	6	Receivables due from officers, directors, trustees, and other disqualified persons (attach schedule) (see page 15 of the instructions)			
	7	Other notes and loans receivable (attach schedule)			
		Less: allowance for doubtful accounts			
	8	Inventories for sale or use			
	9	Prepaid expenses and deferred charges			
	10a	Investments—U S and state government obligations (attach schedule)			
		b Investments—corporate stock (attach schedule)			
		c Investments—corporate bonds (attach schedule)			
	11	Investments—land, buildings, and equipment basis			
	Less: accumulated depreciation (attach schedule)				
12	Investments—mortgage loans				
13	Investments—other (attach schedule)				
14	Land, buildings, and equipment basis				
	Less: accumulated depreciation (attach schedule)				
15	Other assets (describe)				
16	Total assets (to be completed by all filers—see page 16 of the instructions. Also, see page 1, item f)	0	0	0	
Liabilities	17	Accounts payable and accrued expenses	0		0
	18	Grants payable			
	19	Deferred revenue			
	20	Loans from officers, directors, trustees, and other disqualified persons			
	21	Mortgages and other notes payable (attach schedule)			
	22	Other liabilities (describe)			
23	Total liabilities (add lines 17 through 22)	0	0	0	
Net Assets or Fund Balances	Organizations that follow SFAS 117, check here and complete lines 24 through 26 and lines 30 and 31.		<input type="checkbox"/>		
	24	Unrestricted			
	25	Temporarily restricted			
	26	Permanently restricted			
	Organizations that do not follow SFAS 117, check here and complete lines 27 through 31.		<input type="checkbox"/>		
	27	Capital stock, trust principal, or current funds			
	28	Paid-in or capital surplus, or land, bldg., and equipment fund			
	29	Retained earnings, accumulated income, endowment, or other funds			
	30	Total net assets or fund balances (see page 17 of the instructions)	0	0	0
31	Total liabilities and net assets/fund balances (see page 17 of the instructions)	0	0	0	

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Part III Analysis of Changes in Net Assets or Fund Balances		
1	Total net assets or fund balances at beginning of year—Part II, column (a), line 30 (must agree with end-of-year figure reported on prior year's return)	0
2	Enter amount from Part I, line 27a	
3	Other increases not included in line 2 (itemize)	
4	Add lines 1, 2, and 3	
5	Decreases not included in line 2 (itemize)	
6	Total net assets or fund balances at end of year (line 4 minus line 5)—Part II, column (b), line 30	0

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Part IV Capital Gains and Losses for Tax on Investment Income

(a) List and describe the kind(s) of property sold (e.g., real estate, 2-story brick warehouse, or common stock, 200 shs. MLC Co.)		(b) How acquired P—Purchase D—Donation	(c) Date acquired (mo., day, yr.)	(d) Date sold (mo., day, yr.)
1a				
b				
c				
d				
e				

(e) Gross sales price	(f) Depreciation allowed (or allowable)	(g) Cost or other basis plus expense of sale	(h) Gain or (loss) (g) plus (f) minus (e)
a			
b			
c			
d			
e			

(i) FMV as of 12/31/69	(j) Adjusted basis as of 12/31/69	(k) Excess of col. (i) over col. (j), if any	(l) Gain (Col. (h) gain minus col. (k), but not less than -0-) or Losses (from col. (h))
a			
b			
c			
d			
e			

2 Capital gain net income or (net capital loss) (If gain, also enter in Part I, line 8. If loss, enter -0- in Part I, line 8.) 2

3 Net short-term capital gain or (loss) as defined in sections 1222(5) and (6). (If gain, also enter in Part I, line 8, column (c) (see pages 13 and 17 of the instructions). If loss, enter -0- in Part I, line 8.) 3

Part V Qualification Under Section 4940(e) for Reduced Tax on Net Investment Income

(For optional use by domestic private foundations subject to the section 4940(a) tax on net investment income.)

If section 4940(d)(2) applies, leave this part blank.

Was the organization liable for the section 4942 tax on the distributable amount of any year in the base period? Yes No
If "Yes," the organization does not qualify under section 4940(e). Do not complete this part.

1 Enter the appropriate amount in each column for each year; see page 18 of the instructions before making any entries.

(a) Base period years Calendar year (or tax year beginning in)	(b) Adjusted qualifying distributions	(c) Net value of noncharitable-use assets	(d) Distribution ratio (col. (b) divided by col. (c))
2004			
2003			
2002			
2001			
2000			

2 Total of line 1, column (d) 2

3 Average distribution ratio for the 5-year base period—divide the total on line 2 by 5, or by the number of years the foundation has been in existence if less than 5 years 3

4 Enter the net value of noncharitable-use assets for 2005 from Part X, line 5 4

5 Multiply line 4 by line 3 5

6 Enter 1% of net investment income (1% of Part I, line 27b) 6

7 Add lines 5 and 6 7 09-4403 0106

8 Enter qualifying distributions from Part XII, line 4 8
If line 8 is equal to or greater than line 7, check the box in Part VI, line 1b, and complete that part using a 1% tax rate. See the Part VI instructions on page 18.

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Page 4

Part VI Excise Tax Based on Investment Income (Section 4940(a), 4940(b), 4940(e), or 4948—see page 18 of the instructions)

Table with 11 rows for excise tax calculations. Includes sub-rows 6a-6d for credits and payments. Total amount of 2006 estimated tax is 11.

Part VII-A Statements Regarding Activities

Table with 11 rows for activity statements. Includes questions about political campaigns, unrelated business income, and public inspection requirements. Includes a ZIP+4 field.

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Part VII-B Statements Regarding Activities for Which Form 4720 May Be Required

File Form 4720 if any item is checked in the "Yes" column, unless an exception applies.

	Yes	No
1a During the year did the organization (either directly or indirectly):		
(1) Engage in the sale or exchange, or leasing of property with a disqualified person? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(2) Borrow money from, lend money to, or otherwise extend credit to (or accept it from) a disqualified person? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(3) Furnish goods, services, or facilities to (or accept them from) a disqualified person? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(4) Pay compensation to, or pay or reimburse the expenses of, a disqualified person? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(5) Transfer any income or assets to a disqualified person (or make any of either available for the benefit or use of a disqualified person)? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(6) Agree to pay money or property to a government official? (Exception. Check "No" if the organization agreed to make a grant to or to employ the official for a period after termination of government service, if terminating within 90 days.) <input type="checkbox"/> Yes <input type="checkbox"/> No		
b If any answer is "Yes" to 1a(1)-(6), did any of the acts fail to qualify under the exceptions described in Regulations section 53.4941(d)-3 or in a current notice regarding disaster assistance (see page 20 of the instructions)? Organizations relying on a current notice regarding disaster assistance check here <input type="checkbox"/>	1b	X
c Did the organization engage in a prior year in any of the acts described in 1a, other than excepted acts, that were not corrected before the first day of the tax year beginning in 2005? <input type="checkbox"/>	1c	X
2 Taxes on failure to distribute income (section 4942) (does not apply for years the organization was a private operating foundation defined in section 4942(j)(3) or 4942(j)(5)):		
a At the end of tax year 2005, did the organization have any undistributed income (lines 6d and 6e, Part XIII) for tax year(s) beginning before 2005? <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes," list the years ▶ 20...., 20...., 20...., 20....		
b Are there any years listed in 2a for which the organization is not applying the provisions of section 4942(a)(2) (relating to incorrect valuation of assets) to the year's undistributed income? (If applying section 4942(a)(2) to all years listed, answer "No" and attach statement—see page 20 of the instructions.) <input type="checkbox"/>	2b	X
c If the provisions of section 4942(a)(2) are being applied to any of the years listed in 2a, list the years here. ▶ 20...., 20...., 20...., 20....		
3a Did the organization hold more than a 2% direct or indirect interest in any business enterprise at any time during the year? <input type="checkbox"/> Yes <input type="checkbox"/> No		
b If "Yes," did it have excess business holdings in 2005 as a result of (1) any purchase by the organization or disqualified persons after May 26, 1969; (2) the lapse of the 5-year period (or longer period approved by the Commissioner under section 4943(c)(3)) to dispose of holdings acquired by gift or bequest; or (3) the lapse of the 10-, 15-, or 20-year first phase holding period? (Use Schedule C, Form 4720, to determine if the organization had excess business holdings in 2005.) <input type="checkbox"/>	3b	X
4a Did the organization invest during the year any amount in a manner that would jeopardize its charitable purposes? <input type="checkbox"/>	4a	X
b Did the organization make any investment in a prior year (but after December 31, 1969) that could jeopardize its charitable purpose that had not been removed from jeopardy before the first day of the tax year beginning in 2005? <input type="checkbox"/>	4b	X
5a During the year did the organization pay or incur any amount to:		
(1) Carry on propaganda, or otherwise attempt to influence legislation (section 4945(e))? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(2) Influence the outcome of any specific public election (see section 4955); or to carry on, directly or indirectly, any voter registration drive? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(3) Provide a grant to an individual for travel, study, or other similar purposes? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(4) Provide a grant to an organization other than a charitable, etc., organization described in section 509(a)(1), (2), or (3), or section 4940(d)(2)? <input type="checkbox"/> Yes <input type="checkbox"/> No		
(5) Provide for any purpose other than religious, charitable, scientific, literary, or educational purposes, or for the prevention of cruelty to children or animals? <input type="checkbox"/> Yes <input type="checkbox"/> No		
b If any answer is "Yes" to 5a(1)-(5), did any of the transactions fail to qualify under the exceptions described in Regulations section 53.4945 or in a current notice regarding disaster assistance (see page 20 of the instructions)? Organizations relying on a current notice regarding disaster assistance check here <input type="checkbox"/>	5b	X
c If the answer is "Yes" to question 5a(4), does the organization claim exemption from the tax because it maintained expenditure responsibility for the grant? <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes," attach the statement required by Regulations section 53.4945-5(c).		
6a Did the organization, during the year, receive any funds, directly or indirectly, to pay premiums on a personal benefit contract? <input type="checkbox"/> Yes <input type="checkbox"/> No		
b Did the organization, during the year, pay premiums, directly or indirectly, on a personal benefit contract? <input type="checkbox"/> Yes <input type="checkbox"/> No If you answered "Yes" to 6b, also file Form 8870	6b	X

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Part VIII Information About Officers, Directors, Trustees, Foundation Managers, Highly Paid Employees, and Contractors

1 List all officers, directors, trustees, foundation managers and their compensation (see page 21 of the instructions).

(a) Name and address	(b) Title, and average hours per week devoted to position	(c) Compensation (if not paid, enter -0-)	(d) Contributions to employee benefit plans and deferred compensation	(e) Expense account, other allowances

2 Compensation of five highest-paid employees (other than those included on line 1—see page 21 of the instructions). If none, enter "NONE."

(a) Name and address of each employee paid more than \$50,000	(b) Title and average hours per week devoted to position	(c) Compensation	(d) Contributions to employee benefit plans and deferred compensation	(e) Expense account, other allowances
NONE				

Total number of other employees paid over \$50,000 10266972

3 Five highest-paid independent contractors for professional services—(see page 21 of the instructions). If none, enter "NONE."

(a) Name and address of each person paid more than \$50,000	(b) Type of service	(c) Compensation
NONE		

Total number of others receiving over \$50,000 for professional services

Part IX-A Summary of Direct Charitable Activities

List the foundation's four largest direct charitable activities during the tax year. Include relevant statistical information such as the number of organizations and other beneficiaries served, conferences convened, research papers produced, etc.	Expenses
1. NONE	
2.	
3.	
4.	

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Page 7

Part IX-B Summary of Program-Related Investments (see page 22 of the instructions)

Describe the two largest program-related investments made by the foundation during the tax year on lines 1 and 2

	Amount
1	
2	
All other program-related investments. See page 22 of the instructions	
3	
Total. Add lines 1 through 3	

Part X Minimum Investment Return (All domestic foundations must complete this part. Foreign foundations, see page 22 of the instructions.)

1 Fair market value of assets not used (or held for use) directly in carrying out charitable, etc., purposes:		
a Average monthly fair market value of securities	1a	
b Average of monthly cash balances	1b	
c Fair market value of all other assets (see page 23 of the instructions)	1c	
d Total (add lines 1a, b, and c)	1d	
e Reduction claimed for blockage or other factors reported on lines 1a and 1c (attach detailed explanation)	1e	
2 Acquisition indebtedness applicable to line 1 assets	2	
3 Subtract line 2 from line 1d	3	
4 Cash deemed held for charitable activities. Enter 1 1/2% of line 3 (for greater amount, see page 23 of the instructions)	4	
5 Net value of noncharitable-use assets. Subtract line 4 from line 3. Enter here and on Part V, line 4	5	
6 Minimum investment return. Enter 5% of line 5	6	

Part XI Distributable Amount (see page 23 of the instructions) (Section 4942(b)(3) and (b)(5) private operating foundations and certain foreign organizations check here and do not complete this part.)

1 Minimum investment return from Part X, line 6	1	
2a Tax on investment income for 2005 from Part VI, line 5	2a	
2b Income tax for 2005. (This does not include the tax from Part VI.)	2b	
2c Add lines 2a and 2b	2c	
3 Distributable amount before adjustments. Subtract line 2c from line 1	3	
4 Recoveries of amounts treated as qualifying distributions	4	
5 Add lines 3 and 4	5	
6 Deduction from distributable amount (see page 24 of the instructions)	6	
7 Distributable amount as adjusted. Subtract line 6 from line 5. Enter here and on Part XIII, line 1	7	

Part XII Qualifying Distributions (see page 24 of the instructions)

1 Amounts paid (including administrative expenses) to accomplish charitable, etc., purposes:	
a Expenses, contributions, gifts, etc.—total from Part I, column (d), line 26	1a
b Program-related investments—total from Part IX-B	1b
2 Amounts paid to acquire assets used (or held for use) directly in carrying out charitable, etc., purposes	2
3 Amounts set aside for specific charitable projects that satisfy the:	
a Suitability test (prior IRS approval required)	3a
b Cash distribution test (attach the required schedule)	3b
4 Qualifying distributions. Add lines 1a through 3b. Enter here and on Part V, line 8, and Part XIII, line 4	4
5 Organizations that qualify under section 4940(e) for the reduced rate of tax on net investment income. Enter 1% of Part I, line 27b (see page 24 of the instructions)	5
6 Adjusted qualifying distributions. Subtract line 5 from line 4	6

Note: The amount on line 6 will be used in Part V, column (b), in subsequent years when calculating whether the foundation qualifies for the section 4940(e) reduction of tax in those years.

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Part XIII Undistributed Income (see page 24 of the Instructions)

	(a) Corpus	(b) Years prior to 2004	(c) 2004	(d) 2005
1 Distributable amount for 2005 from Part XI, line 7				
2 Undistributed income, if any, as of the end of 2004:				
a Enter amount for 2004 only				
b Total for prior years: 20____, 20____, 20____				
3 Excess distributions carryover, if any, to 2005:				
a From 2000				
b From 2001				
c From 2002				
d From 2003				
e From 2004				
f Total of lines 3a through e				
4 Qualifying distributions for 2005 from Part XII, line 4: ▶ \$ _____				
a Applied to 2004, but not more than line 2a				
b Applied to undistributed income of prior years (Election required—see page 25 of the instructions)				
c Treated as distributions out of corpus (Election required—see page 25 of the instructions)				
d Applied to 2005 distributable amount				
e Remaining amount distributed out of corpus				
5 Excess distributions carryover applied to 2005 (If an amount appears in column (d), the same amount must be shown in column (a).)				
6 Enter the net total of each column as indicated below:				
a Corpus. Add lines 3f, 4c, and 4e. Subtract line 5				
b Prior years' undistributed income. Subtract line 4b from line 2b				
c Enter the amount of prior years' undistributed income for which a notice of deficiency has been issued, or on which the section 4942(a) tax has been previously assessed				
d Subtract line 6c from line 6b. Taxable amount—see page 25 of the instructions				
e Undistributed income for 2004. Subtract line 4a from line 2a. Taxable amount—see page 25 of the instructions				
f Undistributed income for 2005. Subtract lines 4d and 5 from line 1. This amount must be distributed in 2006				
7 Amounts treated as distributions out of corpus to satisfy requirements imposed by section 170(b)(1)(E) or 4942(g)(3) (see page 25 of the instructions)				
8 Excess distributions carryover from 2000 not applied on line 5 or line 7 (see page 25 of the instructions)				
9 Excess distributions carryover to 2006. Subtract lines 7 and 8 from line 6a				
10 Analysis of line 9:				
a Excess from 2001				
b Excess from 2002				
c Excess from 2003				
d Excess from 2004				
e Excess from 2005				

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Part XIV Private Operating Foundations (see page 26 of the instructions and Part VII-A, question 9)

1a If the foundation has received a ruling or determination letter that it is a private operating foundation, and the ruling is effective for 2005, enter the date of the ruling

b Check box to indicate whether the organization is a private operating foundation described in section 4942(j)(3) or 4942(j)(5)

	Prior 3 years				(e) Total
	(a) 2005	(b) 2004	(c) 2003	(d) 2002	
2a Enter the lesser of the adjusted net income from Part I or the minimum investment return from Part X for each year listed					
b 85% of line 2a					
c Qualifying distributions from Part XII, line 4 for each year listed					
d Amounts included in line 2c not used directly for active conduct of exempt activities					
e Qualifying distributions made directly for active conduct of exempt activities. Subtract line 2d from line 2c					
3 Complete 3a, b, or c for the alternative test relied upon.					
a "Assets" alternative test—enter:					
(1) Value of all assets					
(2) Value of assets qualifying under section 4942(j)(3)(B)(i)					
b "Endowment" alternative test—enter % of minimum investment return shown in Part X, line 6 for each year listed					
c "Support" alternative test—enter:					
(1) Total support other than gross investment income (interest, dividends, rents, payments on securities loans (section 512(a)(5)), or royalties)					
(2) Support from general public and 5 or more exempt organizations as provided in section 4942(j)(3)(B)(ii)					
(3) Largest amount of support from an exempt organization					
(4) Gross investment income					

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Part XV Supplementary Information (Complete this part only if the organization had \$5,000 or more in assets at any time during the year—see page 26 of the instructions.)

1 Information Regarding Foundation Managers:

a List any managers of the foundation who have contributed more than 2% of the total contributions received by the foundation before the close of any tax year (but only if they have contributed more than \$5,000). (See section 507(d)(2).)

b List any managers of the foundation who own 10% or more of the stock of a corporation (or an equally large portion of the ownership of a partnership or other entity) of which the foundation has a 10% or greater interest.

2 Information Regarding Contribution, Grant, Gift, Loan, Scholarship, etc., Programs:

Check here if the organization only makes contributions to preselected charitable organizations and does not accept unsolicited requests for funds. If the organization makes gifts, grants, etc. (see page 26 of the instructions) to individuals or organizations under other conditions, complete items 2a, b, c, and d.

a The name, address, and telephone number of the person to whom applications should be addressed:

b The form in which applications should be submitted and information and materials they should include:

c Any submission deadlines: 09-4403 0112

d Any restrictions or limitations on awards, such as by geographical areas, charitable fields, kinds of institutions, or other factors:

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Part XV Supplementary Information (continued)

3 Grants and Contributions Paid During the Year or Approved for Future Payment

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
a <i>Paid during the year</i>				
Total				3a
b <i>Approved for future payment</i>				
Total				3b

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Part XVII Information Regarding Transfers To and Transactions and Relationships With Noncharitable Exempt Organizations

- 1 Did the organization directly or indirectly engage in any of the following with any other organization described in section 501(c) of the Code (other than section 501(c)(3) organizations) or in section 527, relating to political organizations?
- a Transfers from the reporting organization to a noncharitable exempt organization of:
 - (1) Cash 1a(1)
 - (2) Other assets 1a(2)
 - b Other transactions:
 - (1) Sales of assets to a noncharitable exempt organization 1b(1)
 - (2) Purchases of assets from a noncharitable exempt organization 1b(2)
 - (3) Rental of facilities, equipment, or other assets 1b(3)
 - (4) Reimbursement arrangements 1b(4)
 - (5) Loans or loan guarantees 1b(5)
 - (6) Performance of services or membership or fundraising solicitations 1b(6)
 - c Sharing of facilities, equipment, mailing lists, other assets, or paid employees 1c
 - d If the answer to any of the above is "Yes," complete the following schedule. Column (b) should always show the fair market value of the goods, other assets, or services given by the reporting organization. If the organization received less than fair market value in any transaction or sharing arrangement, show in column (d) the value of the goods, other assets, or services received.

(a) Line no.	(b) Amount involved	(c) Name of noncharitable exempt organization	(d) Description of transfers, transactions, and sharing arrangements

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2a Is the organization directly or indirectly affiliated with, or related to, one or more tax-exempt organizations described in section 501(c) of the Code (other than section 501(c)(3)) or in section 527? Yes No

b If "Yes," complete the following schedule.

(a) Name of organization	(b) Type of organization	(c) Description of relationship

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than taxpayer or fiduciary) is based on all information of which preparer has any knowledge.

Sign Here	Signature of officer or trustee <i>K.B. de</i>	Date 1/8/07	Title CHAIRMAN
	Preparer's signature <i>[Signature]</i>	Date 1/8/07	Preparer's SSN or PTIN (See Signature on page 28 of the instructions)

Firm's name (if you're a self-employed), address, and ZIP code: **RAB Accounting Services**
575 Neptune Ave 190, Bklyn NY 10224

EIN: 11-3298966 Phone no: ()

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Deductibility Code

Publication 78 uses a coding system to identify each organization listed by type and limitation on deductibility of charitable contributions to the organization. The code(s) displayed depend(s) on the code for which the organization qualifies. In cases where an organization has multiple deductibility codes, only the definition for each applicable deductibility code is displayed.

Code	Meaning
4	A private foundation, generally with a 30% deductibility limitation.

Close

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**Deductibility Code**

Publication 78 uses a coding system to identify each organization listed by type and limitation on deductibility of charitable contributions to the organization. The code(s) displayed depend(s) on the code for which the organization qualifies. In cases where an organization has multiple deductibility codes, only the definition for each applicable deductibility code is displayed.

Code	Meaning
4	A private foundation, generally with a 30% deductibility limitation.

Close

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Exhibit 9

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re: Representative of IBM, Vice President Market Development, IBM
Review #: 09-2567; 09-4403; 09-3698; 09-6333; 09-2222
Date: May 8, 2009
Location: IBM Offices, Washington, D.C.
Participants: Leo Wise
Beth Horton
Lisa Palluconi, Counsel for Government Programs for IBM
Adrienne G. Rhone, Director Governmental Programs

Summary: The Representative of IBM is the Vice President of Market Development for IBM. She was interviewed pursuant to Reviews 09-2567; 09-4403; 09-3698; 09-6333; and 09-2222. The Representative of IBM helped arrange IBM's participation at the 13th Annual Caribbean Multinational Business Conference in 2008; she also participated at the event. We requested an interview with the Representative of IBM and she consented to an interview. The Representative of IBM made the following statements in response to our questioning:

1. The Representative of IBM was given an 18 U.S.C. § 1001 warning and she signed a written acknowledgement of the warning.
2. She attended the 13th Annual Caribbean Multinational Business Conference in 2008.
3. She attended the conference to extend IBM to areas that were not currently being served. She focuses on the Caribbean because of her division at IBM which is women and minorities. The Caribbean is an underdeveloped business unit for IBM.

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

4. She first attended the conference in 2004, as a participant, to see if the conference would be a good fit for IBM to participate at as a sponsor.
5. IBM was an entry level sponsor in '05.
6. She dealt with Faye Rodney on conference matters.
7. After her attendance in '05, she received a thank you letter signed by the Rodneys that asked IBM to be a sponsor at the '06 conference.
8. IBM participated at the '05, '06, '07 and '08 conference.
9. The Rodneys continued their prior practice and sent a thank you letter with a request for sponsorship after the '07 conference for IBM to participate at the '08 conference.
10. The letter was sent to the Operations Executive and the decision to participate was decided as a team. Colin Ward, with ENI Systems, is one of IBM's business partners who also went to the conference.
11. The letter is the first communication regarding the conference.
12. After the letter is received, the team manager negotiates participation at the conference. Negotiations included timing of sessions (day/time). She requested Friday, right before or right after lunch, for the IBM session. It was important to have attendance by individuals interested in technology.
13. She also agreed to moderate the women's breakfast sponsored by Macy's.
14. The team manager would have worked with the Rodneys regarding the break-out sessions.
15. IBM controlled its own content for the session(s).
16. The first year IBM sponsored the conference, the sponsorship level was \$10,000. IBM sponsored the conference the following year at \$15,000, and in '08 the sponsorship went up to \$20,000 after IBM received a request from Faye Rodney for an increase. The Representative of IBM initially counter-offered \$18,000 but agreed to the \$20,000 at the urging of Ms. Rodney.
17. IBM has a methodical way of approving conference sponsorships. The letter from the Rodneys was received in July.

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18. She approved the check for the purchase order and released the check. Carib would have received the check in August or September.
19. After the check is released, she and the business partner collaborate on the content of session.
20. She and the business partner attended the conference.
21. She has only seen the Rodneys at the conference. She has been invited to other events but has not accepted the invitations.
22. She received a call from Mr. Rodney about the article on the conference.
23. She had no knowledge of the Foundation until this matter.
24. She understood Carib News to be the sponsor.
25. The \$20,000 level of sponsorship is low for IBM in general. However, it is worth the presence and branding for small the small business unit practice.
26. She thought IBM's sponsorship was of the conference, she did not know the Foundation existed until this issue arose. Her department does not give to non-profit organizations, only to businesses.
27. The only parameters placed on the money for the conference was with respect to time slots and length of the sessions.
28. She tells her team her preferences and the team works out the specifics with Carib.
29. She does not recall seeing a specific document that listed the various levels of sponsorship.
30. Carib News provides the framework for the conference. Then she typically tells Carib what she wants and what they will pay. She was aware from the signage that other companies were larger sponsors.
31. She arrived at the conference on Thursday and attended the opening reception. She attended a reception on Friday that was hosted by Citi and a breakout session.
32. She noticed names of entities on the agenda from the web that she knew were not at the conference.

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33. She noted that the agenda also listed her breakout session on Saturday which was inaccurate. Her session was on Friday, so she knew the agenda could not have been the final agenda.
34. She seemed to recall seeing the agenda that was submitted to Standards. She noted that the 12:00pm session was accurate, but that she did not believe that the breakout listed on Saturday was accurate.
35. She attended the Macy's breakfast on Saturday morning because it is a popular event. She noted who was on the breakfast panel and who was not (names were listed on agenda). Michelle Patterson did not speak, Burnice Johnson was not on the panel and she was not sure if she even attended the conference.
36. She saw several of the Members who attended the conference. She was on the same flight as Representative Payne. She spoke to Representative Rangel at the reception. Representative Kilpatrick was on a panel with her. And Representative Thompson road to an off-sight event with her. She was sure that she spoke to Delegate Christensen. And she spoke to Sheila Jackson Lee at the awards night.
37. The off-sight event was held at a separate hotel, it included local talent and a comedienne.
38. She stated that Members did not attend the breakout sessions.
39. She had a conversation with Rep. Thompson regarding the election.
40. She left the conference on Sunday morning by 7:00am.
41. She spoke with her team after the article regarding the conference came out.
42. She also called Mr. Rodney after she saw the article; she stated that he told her that there was an investigation and assured her that he had done all that he was supposed to do and that he wanted to keep her as a sponsor.
43. She understood sponsor to be financial sponsor of the conference. She assumed all of the companies whose logos appeared on the banner were sponsors. She assumed Carib News organized the conference.
44. She was not aware of how funding for the conference was handled. She assumed the payment from IBM went to pay for her breakout session and collateral expenses for the session.

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45. Her registration fee was part of the sponsorship. She paid for her room and all travel costs.
46. There were less than 300 people at the conference.
47. When she registered for the conference, she received a badge that allowed access to buffets during the meetings.
48. The registration fee for the conference in '05 was \$750.00.
49. She was not aware of the '08 registration fee.

Beth Horton
Investigative Counsel

OFFICE OF CONGRESSIONAL ETHICS
U.S. HOUSE OF REPRESENTATIVES

18 U.S.C. § 1001 ACKNOWLEDGEMENT

I have been provided with a copy of the text of section 1001 of title 18, United States Code (popularly known as the false Statements Act) and hereby acknowledge that it applies to any testimony or documents I provide to the Office of Congressional Ethics.

Name: _____

Signature: _____

Date: 5/8/08

For Office Use:
Review(s) No. _____

1040

Exhibit 10

09-4403 0123

1041

Susan A. Sullivan
Verizon Foundation
Director - Strategic Planning & Partnerships



Verizon Foundation
One Verizon Way
Bldg 6, 3rd Flr South
Basking Ridge, NJ 07920

November 25, 2008

Mr. Karl B. Rodney
Chairman & CEO
Carib News Charities, Inc.
7 West 36th Street, 8th Floor
New York, NY 10018

Dear Mr. Rodney:

On behalf of the Verizon Foundation, it is a pleasure to present the enclosed check for \$35,000.00 to Carib News Charities, Inc. in support of the 13th Annual Carib News Multi-National Business Conference - November 6-9, 2008.

Under the Omnibus Budget Reconciliation Act of 1993, Verizon Communications must receive a written receipt from all organizations to which it makes a charitable contribution. Therefore, please complete and return the enclosed form acknowledging this gift within two weeks of receipt.

Verizon Foundation is delighted to support Carib News Charities, Inc. and we wish to thank you and the organization for your dedication and contribution to our communities.

Please recognize our contribution as coming from "Verizon Communications."

Sincerely,

A handwritten signature in cursive script that reads "Susan Sullivan".

SS/ah

Enclosures

cc: Patrick Gaston
Albert Browne

09-4403 0124

VZ-OCE 0001

1042

INVOICE NUMBER	INVOICE DATE	DESCRIPTION	GROSS	DISCOUNT	NET AMOUNT
00394421-00003064	11/17/2008	005-13TH ANNUAL MULTI-NATIONAL	35,000.00		35,000.00
Check No.	Check Date	Vendor No.	Handling Code	Total	
0002756	11/21/2008	0000011039	FN	\$35,000.00	0.00
				Questions? Call	916/357-3270 BU APCRP

PAGE 1 of 1

FOLD ALONG PERFORATED DOTTED LINE & REMOVE CHECK

THIS DOCUMENT CONTAINS MULTIPLE FRAUD DETERRENT SECURITY FEATURES - SEE REVERSE

Wachovia Bank, National Association
Chapel Hill, NC 27514

Date 11/21/2008

0002756

06-106
514

Pay to the order of

\$ 35,000.00

Catherine J. Webster

VOID 60 MONTHS AFTER ISSUE DATE

verizon
P.O. Box 2200
Folsom, CA 95763-2200
916/957-3470

Thirty five thousand and 00/100 Dollars
PAY CARIB NEWS CHARITIES, INC.
7 WEST 36TH STREET, 8TH FLR.
NEW YORK, New York 10018

⑈0002756⑈ ⑆053101561⑆ 2079900572609⑈

SEE REVERSE SIDE FOR OPENING INSTRUCTIONS

verizon
P.O. Box 2200
Folsom, CA 95763-2200

PRESORTED
FIRST-CLASS MAIL
U.S. POSTAGE PAID
SACRAMENTO, CA
PERMIT NO. 98

CARIB NEWS CHARITIES, INC.
7 WEST 36TH STREET, 8TH FLR.
NEW YORK, New York 10018

09-4403 0125
VZ-OCE 0002

Acknowledgment of Charitable Contribution

IMPORTANT: Please acknowledge the enclosed charitable contribution by completing and returning this form. Donors cannot deduct contributions unless they are acknowledged in this manner and a failure to return this form in a timely manner may make you ineligible for future contributions by Verizon Foundation.

1. I hereby acknowledge the Verizon Foundation 2008 contribution of:
\$35,000.00
for 13th Annual Multi-National Business Conference - November 6-9, 2008.

(or describe property or services other than money received)

Received on (date): _____ Date of check: 11/21/08

2. Please indicate whether or not any goods or services were provided by your organization in consideration for this contribution (e.g., the value of food, beverage, ticket or entertainment at a fundraising event):
Yes _____ No _____

If YES, please describe what was provided and give a good faith estimate of the value to the goods or services, understanding that the amount of the contribution that is deductible as a charitable contribution is limited to the excess of money and the value of property contributed over the value of the goods and services provided by the charity.

Description: _____ Est. Value: \$ _____

3. The information above is provided for the purpose of complying with IRS reporting requirements and is accurate to the best of my knowledge, I understand that penalties may be imposed by the IRS on charities that fail to make the required disclosure or for making a disclosure that is inaccurate or incomplete.

Name: _____

Title: _____

Organization: Carib News Charities, Inc.

Organization Tax I.D.#: 133632050vz

Signature: _____

Date: _____

Please return to:

Anita Coleman-Hunt
Verizon Foundation One Verizon Way, VC63S427
Basking Ridge, NJ 07920

Telephone: 908-559-3516

Fax: 908-630-2680

09-4403 0126

VZ-OCE 0003

Acknowledgment of Charitable Contribution

IMPORTANT: Please acknowledge the enclosed charitable contribution by completing and returning this form. Donors cannot deduct contributions unless they are acknowledged in this manner and a failure to return this form in a timely manner may make you ineligible for future contributions by Verizon Foundation.

1. I hereby acknowledge the Verizon Foundation 2008 contribution of:
\$35,000.00
for 13th Annual Multi-National Business Conference - November 6-9, 2008.

(or describe property or services other than money received)

Received on (date): 11/26/08 Date of check: 11/21/08

2. Please indicate whether or not any goods or services were provided by your organization in consideration for this contribution (e.g., the value of food, beverage, ticket or entertainment at a fundraising event):
 Yes No

If YES, please describe what was provided and give a good faith estimate of the value to the goods or services, understanding that the amount of the contribution that is deductible as a charitable contribution is limited to the excess of money and the value of property contributed over the value of the goods and services provided by the charity.

Description: Registration + Conference Meal Plan Est. Value: \$ 1300.00

3. The information above is provided for the purpose of complying with IRS reporting requirements and is accurate to the best of my knowledge. I understand that penalties may be imposed by the IRS on charities that fail to make the required disclosure or for making a disclosure that is inaccurate or incomplete.

Name: KARL B. RODNEY
Title: PUBLISHER/CEO
Organization: Carib News Charlies, Inc.

Organization Tax I.D.#: 133632050vz

Signature:  Date: 12/3/08

Please return to:
Anita Coleman-Hunt
Verizon Foundation One Verizon Way, VC63S427
Basking Ridge, NJ 07920

Telephone: 908-559-3516
Fax: 908-630-2660

09-4403 0127

VZ-OCE 0004

Exhibit 11

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re: Representative 1 of the Verizon Foundation
Review #: 09-2567; 09-4403; 09-3698; 09-6333; 09-2222
Date: March 23, 2009
Location: Verizon Offices, Washington, DC
Participants: Leo Wise
Omar Ashmawy
Beth Horton
David Kass, Assistant General Counsel Compliance
James C. Wilson, Vice President and Associate General Counsel Compliance

Summary: Representative 1 of the Verizon Foundation is the President and the Strategic Director for Philanthropy of the Verizon Foundation. He was interviewed pursuant to Reviews 09-2567; 09-4403; 09-3698; 09-6333; and 09-2222. Representative 1 of the Verizon Foundation participated at the 13th Annual Caribbean Multinational Business Conference in 2008. We requested an interview with Representative 1 of the Verizon Foundation and he consented to an interview. Representative 1 of the Verizon Foundation made the following statements in response to our questioning:

1. Representative 1 of the Verizon Foundation was given an 18 U.S.C. § 1001 warning, signed a written acknowledgement of the warning
2. Representative 1 of the Verizon Foundation is currently the President of the Verizon Foundation ("the Foundation") and Strategic Director for Philanthropy. His duties

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involve budget planning and implementation and governance for the foundation.

Representative 1 of the Verizon Foundation has significant decision-making authority over grants issued by the foundation. He approves all grants in excess of \$25,000 and all grants funded more than two years in a row. He has been with the foundation and acting as President for the past five years.

3. The Foundation is funded through a corpus donated by Verizon and through public donations under Verizon Reads, a program that is offered as part of customer billing statements. The Foundation approves approximately 2,900 grants (totaling 67 million) through a competitive loan application process. The Foundation's online loan application process has specific approval requirements, including a quarterly "impact report."
4. The Foundation funded the Carib News Foundation for the first time in 2008, the grant was issued to provide funding for the 13th Annual Caribbean Multinational Business Conference ("the Conference"). Representative 1 of the Verizon Foundation approved the Carib News Foundation grant. Representative 2 of the Verizon Foundation was the Foundation's contact person for the Conference. Representative 1 of the Verizon Foundation did not interact with Karl Rodney or anyone at Carib News regarding the Foundation's participation at the Conference. Both Representative 1 of the Verizon Foundation and Representative 2 of the Verizon Foundation attended the conference. Mr. Rodney invited Representative 1 of the Verizon Foundation to speak at the Conference and subsequently applied for a grant from the Foundation.
5. Representative 1 of the Verizon Foundation and Mr. Rodney are both members of the board of the Foundation for the University of the West Indies. The two men interacted at board meetings four times per year. Representative 1 of the Verizon Foundation stated that he may also have spoken to Mr. Rodney 1-2 other times prior to the Conference regarding how the Foundation could showcase its Thinkfinity program. He also stated that he may have spoken to Mr. Rodney once after receiving his letter of invitation for the Conference. He does not recall Mr. Rodney "pitching" the conference to him. Representative 1 of the Verizon Foundation stated that the Foundation would not have participated at the Conference unless he could speak on educational issues. Representative 1 of the Verizon Foundation believed the Conference would be a good opportunity to showcase the Foundation's Thinkfinity program.
6. Mr. Rodney was aware of the Foundation's educational work through his interaction with Representative 1 of the Verizon Foundation at board meetings for the Foundation of the University of West Indies. Representative 1 of the Verizon Foundation stated that while

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he had spoken with Mr. Rodney regarding the Thinkfinity program, he did not make any type of informal commitment to fund the Conference.

7. Representative 1 of the Verizon Foundation believed that there were three levels of sponsorship for the Conference, the highest being \$50,000 and the lowest being \$25,000. However, he does not recall seeing any specific document(s) setting out the different levels of sponsorship. He stated that he was not interested in sponsorship at the \$50,000 level but later decided on a \$35,000 grant donation. When asked what the Foundation received at the Conference for the \$35,000, Representative 1 of the Verizon Foundation stated signage and visibility. Representative 1 of the Verizon Foundation stated that the Foundation often provides such support for conferences, including the NAACP conference and National Urban League Conference.
8. Representative 1 of the Verizon Foundation was provided 3 venues at the Conference to speak about the Thinkfinity program. The Foundation believed participation at the Conference would provide exposure to English speaking Caribbean individuals who have connections to universities in New York.
9. The Foundation is required to issue grants only to 501(c)(3) entities. The Foundation could not make a donation to a corporation. Representative 1 of the Verizon Foundation was somewhat familiar with the Carib News paper; he has been featured in the paper and Verizon has advertised in the paper. Representative 1 of the Verizon Foundation was not aware of Carib News Charities until the entity applied for a grant. He believed Carib News Charities was the same entity as Carib News Foundation. He is not aware of any other work the Carib News Charities/Foundation is involved in other than the conference. Mr. Rodney did not talk about the Carib News Charities/Foundation at board meetings.
10. Representative 1 of the Verizon Foundation arrived at the Conference on Thursday afternoon and departed on Saturday morning. Representative 1 of the Verizon Foundation stated that he went to make his speech and promptly left the event. Representative 1 of the Verizon Foundation spoke 3 times on Friday; he was acknowledge at the welcome event on Friday morning and he participated in a demonstration on Thinkfinity in the afternoon. It is not clear from Representative 1 of the Verizon Foundation's remarks what other time he spoke at the Conference. He was invited to speak on Saturday but he did not feel that an extra day was necessary.
11. Representative 1 of the Verizon Foundation recalled seeing and speaking to Congressman Rangel. The Congressman mentioned Alltel and told him to remind his CEO to keep in mind the needs of the minority community. Representative 1 of the Verizon Foundation

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stated that he had no other contact with Members at the Conference. He did not know Delegate Christenson, Congressman Thompson, Congressman Payne and was not sure whether he saw Congresswoman Kilpatrick (he was not sure who she is). He does recall that one lady stated that she would love to see the Thinkfinity program in her state. Representative 1 of the Verizon Foundation was accompanied by Representative 2 of the Verizon Foundation 90% of the time he was at the Conference; he was not aware of any contact between Representative 2 of the Verizon Foundation and any Members.

12. Representative 1 of the Verizon Foundation received an advance copy of the agenda for the conference. The copy indicated that the Foundation was scheduled for two days of activities. He requested that the Saturday meetings be canceled or moved to Friday. He had not seen the agenda that Mr. Rodney submitted to the Ethics Committee for travel approval. He stated that advance copies of the agenda were common, most organizations provided the same level of detail with other conferences. He believed that he had seen more than one copy of the agenda. The agendas that were sent to him focused on the Foundation's participation and not the entire conference.
13. Representative 1 of the Verizon Foundation was asked if it was typical to have an agenda that listed speakers without identifying their employer/affiliations. He was not sure and didn't remember if the drafts he had seen included his title; he was more concerned with having a sense of what he would be doing at the Conference.
14. Representative 1 of the Verizon Foundation spoke with Mr. Rodney prior to the Conference to cancel the programs he was slated to speak at on Saturday (this was his 3rd call regarding the Conference – 1st call was regarding invitation, 2nd call was to discuss his participation, 3rd was to cancel Saturday programs). Mr. Rodney was receptive to Representative 1 of the Verizon Foundation's request and the Saturday program was cancelled.
15. The Foundation paid all travel expenses for Representative 1 of the Verizon Foundation. He did not see the check the Foundation issued for the Conference or the confirmation letter from Mr. Rodney. Representative 1 of the Verizon Foundation met with Mr. Rodney following the conference at a board meeting for the Foundation for the University of West Indies. He also had breakfast with Mr. Rodney at which time they briefly discussed the Conference. According to Representative 1 of the Verizon Foundation, Mr. Rodney was upset over the New York Post article regarding the Conference. Representative 1 of the Verizon Foundation stated that Mr. Rodney felt the article was misleading and that he had done everything that he was supposed to do

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regarding receiving approval from the Ethics Committee. Representative 1 of the Verizon Foundation stated that he and Mr. Rodney did not spend much time speaking about the matter. He felt that Mr. Rodney wanted him to know that he was diligent about following rules. When asked if he knew what rules Mr. Rodney was speaking about, Representative 1 of the Verizon Foundation stated that he did not know which rules he was referring to.

16. Prior to his work with the Foundation, Representative 1 of the Verizon Foundation was with Government Affairs with Verizon, his former position did not involve lobbying. His position involved Strategic Alliance, he was responsible for working with non-profits across the country. He dealt with policy issues regarding universal service. He did not interact with regulators.
17. Representative 1 of the Verizon Foundation met with Eric Eve with Citi 2-3 weeks prior to our interview, they were both attending a meeting with the head of the NAACP. He did not speak to Mr. Eve about the Conference although they did speak about scrutiny on Citi related to TARP funding. He has not had any contact with the Representative of Citi from Citi.

Beth Horton
Investigative Counsel


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OFFICE OF CONGRESSIONAL ETHICS
U.S. HOUSE OF REPRESENTATIVES

18 U.S.C. § 1001 ACKNOWLEDGEMENT

I have been provided with a copy of the text of section 1001 of title 18, United States Code (popularly known as the false Statements Act) and hereby acknowledge that it applies to any testimony or documents I provide to the Office of Congressional Ethics.

Name:  _____

Signature:  _____

Date: 3/23/09 _____

For Office Use:

Review(s) No. _____

09-4403 0134

Exhibit 12

1053

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re: Representative 2 of the Verizon Foundation
Review #: 09-2567; 09-4403; 09-3698; 09-6333; 09-2222
Date: March 23, 2009
Location: Verizon Offices, Washington, DC
Participants: Leo Wise
Omar Ashmawy
Beth Horton
David Kass, Assistant General Counsel Compliance
James C. Wilson, Vice President and Associate General Counsel Compliance

Summary: Representative 2 of the Verizon Foundation is the National Program Director for the Verizon Foundation and Vice President for Education & Technology for Verizon. He was interviewed pursuant to Reviews 09-2567; 09-4403; 09-3698; 09-6333; and 09-2222. Representative 2 of the Verizon Foundation helped arrange the Verizon Foundation's participation at the 13th Annual Caribbean Multinational Business Conference in 2008; he also accompanied Representative 1 of the Verizon Foundation to the event. We requested an interview with Representative 2 of the Verizon Foundation and he consented to an interview. Representative 2 of the Verizon Foundation made the following statements in response to our questioning:

1. Representative 2 of the Verizon Foundation was given an 18 U.S.C. § 1001 warning, signed a written acknowledgement of the warning

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2. Representative 2 of the Verizon Foundation is currently the National Program Director for the Verizon Foundation ("the Foundation") and Vice President for Education & Training for Verizon. He works on educational literacy and technology innovations for the Foundation, 80% of his time is spent on Thinkfinity. He is the only person with an operational role in the program.
3. Representative 2 of the Verizon Foundation helped arrange the Verizon Foundation's participation at 13th Annual Caribbean Multinational Business Conference ("the Conference") in 2008; he also accompanied Representative 1 of the Verizon Foundation to the event.
4. Representative 2 of the Verizon Foundation reviews repeat grant requests for the Foundation. When asked how the Carib News Foundation request came to his desk he stated that it was a result of conversations with Karl Rodney and Representative 1 of the Verizon Foundation. He was not sure which conversation occurred first. Representative 1 of the Verizon Foundation was invited to speak at the Conference and either simultaneously or immediately after Representative 1 of the Verizon Foundation received the invitation, Representative 2 of the Verizon Foundation spoke with Mr. Rodney.
5. Representative 2 of the Verizon Foundation believes that he spoke with Mr. Rodney in person at a meeting for the Foundation for the University of the West Indies. Mr. Rodney inquired about the application for the grant for the Conference. Representative 2 of the Verizon Foundation recalled Mr. Rodney stating that he had spoke with Representative 1 of the Verizon Foundation and that he believed the Conference would be a good fit for the Foundation and would provide a good opportunity to communicate the Foundation's program Thinkfinity.
6. The Verizon Foundation also supports the Foundation for the University of the West Indies. Representative 2 of the Verizon Foundation has interacted with Mr. Rodney regarding the Foundation for the University of the West Indies.
7. Representative 2 of the Verizon Foundation also had previous interactions with Mr. Rodney at dinner and business meetings related the American Fund and to the publication of articles on the Foundation's Thinkfinity program.
8. Representative 2 of the Verizon Foundation will have been with the Foundation 3 years in October.

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9. Representative 2 of the Verizon Foundation believes he began talking with Mr. Rodney about the Conference sometime in the summer. He spoke with Mr. Rodney about the grant application. He described to Mr. Rodney the cyber grant process and explained what needed to be provided in the grant application. The system requires applicants to be 501 (c)(3) entities.
10. The head of Governance and Compliance for Verizon verifies whether applicant is a registered 501(c)(3). A grant request from a non 501 (c)(3) would be removed from the system; the request would not be forwarded to Representative 2 of the Verizon Foundation. The Foundation's grant approval process is formal. Representative 2 of the Verizon Foundation stated that he could show a specific interest in a proposal but could not give any type of commitment to an applicant.
11. Mr. Rodney would be required to provide a deck of the '07 conference, a description of the purpose of the conference and a tentative agenda for the cyber application.
12. Representative 2 of the Verizon Foundation spoke with Mr. Rodney approximately 8-10 weeks prior to the conference at which time they discussed the level of sponsorship the Foundation was interested in funding.
13. Mr. Rodney described 3 levels of sponsorship to Representative 2 of the Verizon Foundation. Representative 2 of the Verizon Foundation stated that this was typical of corporate sponsorships at other conferences.
14. Mr. Rodney offered the Foundation a \$50,000 sponsorship, which was the gold level. Representative 2 of the Verizon Foundation believes there was also a platinum level at \$75,000. He believes that Mr. Rodney showed him a 2007 deck with 3 levels (platinum at \$75,000, gold at \$50,000, and silver at \$25,000) prior to a scheduled interview of Representative 1 of the Verizon Foundation.
15. Representative 2 of the Verizon Foundation explained to Mr. Rodney that the Foundation wished to negotiate a level of funding other than what was being offered. The amount of \$35,000 was decided upon by the Foundation.
16. When asked what the Foundation would receive for its funding, Representative 2 of the Verizon Foundation stated that they would receive signage but that the Foundation was not specifically interested in a "quid pro quo" reciprocation, the Foundation merely wanted to disseminate information about its Thinkfinity program. Representative 2 of the Verizon Foundation stated that the Foundation does not do business in the Caribbean.

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17. Representative 2 of the Verizon Foundation stated that Representative 1 of the Verizon Foundation made an introductory speech but that he was not sure whether the speech was included in the Foundation's sponsorship level; the speech was not pre-set in the 2007 sponsorship deck.
18. Representative 2 of the Verizon Foundation spoke with Mr. Rodney approximately once a week for 6-7 weeks prior to the conference to discuss Verizon's participation/logistics/capacity for web casts at the conference – contact included phone calls and emails. Contact increased as conference approached.
19. When asked how Verizon decided on \$35,000 sponsorship, Representative 2 of the Verizon Foundation stated that he received a call from the Carib staff regarding the conference. The Foundation was asked to sponsor at the \$50,000 level, a \$35,000 counter-offer was made to Mr. Rodney, which he accepted.
20. Conversations regarding sponsorship levels began about 8-10 weeks prior to the conference with the final dollar figure being determined approximately 2 weeks prior to the conference.
21. Representative 2 of the Verizon Foundation spoke with Patricia with Carib regarding sponsorship, she thought the Foundation was sponsoring at the \$50,000, Representative 2 of the Verizon Foundation explained that the amount was \$35,000. When asked if Karl Rodney was upset with the sponsorship level, Representative 2 of the Verizon Foundation answered that he was not upset.
22. Representative 2 of the Verizon Foundation worked on the conference before Carib submitted application for funding which he stated was not unusual.
23. Representative 2 of the Verizon Foundation stated that he saw early drafts of the agenda prior to the conference, and then saw final draft at conference.
24. An early draft was shared with him in order for him to staff and notify Representative 1 of the Verizon Foundation of his speaking times.
25. He did not recall seeing any affiliation information on the early draft, he believes affiliations might have appeared on final draft. He did ask that any information be included on final draft after reviewing the earlier version.
26. Representative 2 of the Verizon Foundation prepared 2 versions of the Foundation's role at the conference.

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27. The topics for the conference were decided through dialog between himself and Karl Rodney with some prior comments from Representative 1 of the Verizon Foundation. Mr. Rodney was aware of the Thinkfinity program. Representative 2 of the Verizon Foundation suggested web casts.
28. Representative 2 of the Verizon Foundation thought that Representative 1 of the Verizon Foundation and Mr. Rodney framed the Foundation's participation at the conference.
29. Town Hall event was Mr. Rodney's idea.
30. Representative 2 of the Verizon Foundation believes that Mr. Rodney was trying to bring together various corporate interests to create a dialogue about social and economic issues that would benefit both the Caribbean and the U.S.
31. Representative 2 of the Verizon Foundation stated that Carib News Foundation was the only charitable entity that he was aware of, it was the listed entity in the grant application.
32. The question arose as to who sponsored conference, Representative 2 of the Verizon Foundation stated that he was aware that Carib News was a for-profit entity, so he asked who was the sponsor. If the sponsor was Carib News, the Foundation could not participate as a sponsor.
33. Representative 2 of the Verizon Foundation stated that he did not see the check that went to the Conference, it would have been generated and sent through the internal system.
34. Representative 2 of the Verizon Foundation did not recall seeing the name Carib News Charities Inc.
35. Representative 2 of the Verizon Foundation saw an early draft of the grant application but does not recall seeing the final version. He was not responsible for final approval.
36. Kathy Browne, Senior VP for Corporate Responsibility would have approved the grant.
37. Representative 2 of the Verizon Foundation spent 2.5 days at the conference, he arrived on Thursday evening, participated at the conference on Friday and departed on Sunday.
38. Representative 2 of the Verizon Foundation and Representative 1 of the Verizon Foundation participated in the welcome remarks on Friday morning, the plenary session, and in a roundtable meeting with educational ministers.
39. Mr. Rodney arranged these meetings, the webcast did not take place.

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40. Representative 2 of the Verizon Foundation did not attend the conference on Saturday or Sunday. He also left the hotel after the Foundation completed its presentations.
41. When asked about the Town Hall meeting, Representative 2 of the Verizon Foundation stated that Karl Rodney suggested that the Foundation speak about the Thinkfinity program, the opening remarks framework was also suggested by Mr. Rodney, Mr. Eve was to give introductory remarks and then Representative 2 of the Verizon Foundation was to speak.
42. There was a back and forth discussion about the plenary session between Representative 2 of the Verizon Foundation and Mr. Rodney to determine what role the Foundation would play in conjunction with the President of Medgar Evers College. The topic was technology supporting education.
43. There was no discussion regarding scheduling sessions to benefit US companies.
44. Representative 2 of the Verizon Foundation stated that he did not have any contact with Members of Congress other than a possible introductory handshake.
45. Representative 2 of the Verizon Foundation saw Representatives Kilpatrick, Rangel and the former head of the NAACP at the conference, along with other governmental officials from other countries. He also recalled seeing Delegate Christensen and Representative Payne. Representative 2 of the Verizon Foundation did not know Representative Thompson.
46. Representative 2 of the Verizon Foundation interacted with Mr. Rodney after the conference to discuss the American Fund and the University of the West Indies. He did not discuss the conference with Mr. Rodney.
47. Representative 2 of the Verizon Foundation believes that he may have received a thank you letter from Mr. Rodney for participating at the conference.
48. He did not see the contribution-sponsorship letter.
49. Representative 2 of the Verizon Foundation was aware of Mr. Rodney's Foundation, and the fact that it sponsored the conference. He also believed Mr. Rodney's Foundation performed social work for boys and girls club events and that it worked with the American Fund for the University of the West Indies. He was not sure why he felt that Rodney's Foundation was involved with these other events.

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

50. Representative 2 of the Verizon Foundation stated that the Foundation did not place any restrictions on the funding it provided to the conference through its grant, the use would have been specified in the grant application/guidelines

Beth Horton
Investigative Counsel

1060

OFFICE OF CONGRESSIONAL ETHICS
U.S. HOUSE OF REPRESENTATIVES

18 U.S.C. § 1001 ACKNOWLEDGEMENT

I have been provided with a copy of the text of section 1001 of title 18, United States Code (popularly known as the false Statements Act) and hereby acknowledge that it applies to any testimony or documents I provide to the Office of Congressional Ethics.

Name: _____

Signature: _____

Date: _____

3/23/09.

For Office Use:

Review(s) No. _____

09-4403 0143

Exhibit 13



Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10018
Tel: (212) 944-1991; Fax: (212) 944-2089
E-mail: info@caribnewsconference.com

April 04, 2008

Ms. Marilyn Johnson
VP Marketing Development
IBM Corporation
1133 Westchester Avenue
White Plains, NY 10604

*Copy of Power Point
- copy of John
- copy of [unclear]*

Dear Ms. Johnson:

For the past twelve years, the annual Caribbean Multi-National Business Conference has been instrumental in encouraging investment, cross-border trade and business partnerships, the role played by executives of major corporations, medium and small-size businesses and entrepreneurs, and deepens the connections with key elected officials.

Your support and that of IBM went a long way to make the conference a success, and has fostered on-going growth in business achievements and impactful policy decisions. We appreciate very much the professionalism and enthusiasm you bring to the Conference with your keen participation. The presence and demonstration of real live "IBM Partner" as a result of the conference is a powerful testimony. We do get concrete results and expressed appreciation of new opportunities.

We can assure you that all the key stakeholders, Members of Congress, Heads and Ministers of Government, Elected Officials, Community and Business Leaders are all aware and appreciative of IBM's participation in this very important mission.

This year, the Thirteenth Annual Conference is scheduled to be held in St. Maarten, November 6 - 9, 2008, and promises to further strengthen and expand on the work done by many of the Caribbean countries developing economies, in collaboration with the emerging markets initiatives in the U.S. The quality of the sessions and the high level of participation is now legendary, and is anxiously awaited each year.

Enclosed is a Power Point presentation of the sponsorship opportunities the Conference provides, and also a program and recap of the 2006-2007 Conference. We know of your interest to deepen the IBM local, regional and global connection, and I know the Conference can achieve that. It is our sincere wish that this presentation motivates your sponsorship.

3

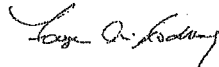
Organized by Carib News Foundation. A non-profit project 501-C3 corporation

We would be happy to answer any questions you might have or to fill in any detail. I can be reached by e-mail: KBRodney@nycaribnews.com or (212) 944-1991.


Because we know of your busy schedule, I will also follow up with your office to ascertain interest level.

Thanks for your kind consideration.

Best regards,



Faye A. Rodney
President



Karl B. Rodney
Publisher/CEO

(4)

1064

WIRE TO US OFFICE

W.A. MCKENZIE

7/16/2008

PA

CARIB NEWS INC.
7 WEST 36TH STREET
8TH FLOOR
NEW YORK, 10018
212-944-1991

Invoice

Date	Invoice #
7/16/2008	45122

Bill To
Wanda McKenzie TMM 2607 Justers Court Marietta, GA 30068

Description	Amount
Sponsorship Multi-National Business Conference 2008 TAX ID 13-362060	28,000.00
Total 6	
Total \$28,000.00	

09-4403 0147

2009-03-02 14:54:00 a shipment: Print WBSRI.HA

		EXP Process 1/1
FROM: 1830 COUNTRY ROAD 4039 M. J. JENNISON CO. ASHQUILA LOGISTICS 4510N TEXAS AUSTIN TEXAS UNITED STATES PHONE: 512-286-2461 TEL: 512-286-2461		
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POST CODE 10018		
Description: 1830 COUNTRY ROAD 4039 Yielded: 1267 Date: 2008-10-08 Call standard stamp and conditions apply		
235151018 JRAC 07 ABH		
0055111 2928725550 (non-transactional)		

International Business Machines Corporation 2100 Broadway, New York, NY 10023-8553	
DATE: 2008/08/08	Check Number 6003770261
NEW YORK CARIB NEWS 7 W 30TH ST 8TH FL NEW YORK NY 10018 UNITED STATES	THE sum of Pay \$ *****20,000.00**
	Per <i>Richard J. Carroll</i> Authorized signature

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7

<https://corporateship.dhl-usa.com/shipmentdocuments/labeldoc.asp>

10/8/2008

09-4403 0148

Exhibit 14

1067

05/15/2009 17:20 FAX

002

May 15, 2009

MEMORANDUM

VIA FAX TO: 202-226-0997

TO: Omar Ashmawy
FROM: Will Ris

RE: Materials related to Carib News Foundation Conference

At your request, I am faxing you the following documents:

1. The original letter of request for support from Carib News Foundation sent to American Airlines. I assume that they sent the identical letter to other airlines because in paragraph 3, they refer to "Continental" when it should be "American". In any case, they requested a total of 95 tickets for this event. We responded orally and told them the maximum we could provide would be 10.
2. A listing of the 10 tickets that we provided. If you need more detailed records of each individual ticket, I am happy to provide it. But this shows the names and itineraries of all 10 travelers. We provided no other support for the conference except that our group sales office authorized a standard 5 percent discount on tickets for those travelling to the conference - - this is universally available to any group of 10 or more travelling to the same location.

If there is anything else I can help you with, please let me know.

09-4403 0150

05/15/2000 17:20 FAX

003



Carib News Foundation
 7 West 36th Street, 8th floor, New York, NY 10018
 Tel: (212) 944-1991; Fax: (212) 944-2089
 E-mail: info@caribnewsconference.com

June 6, 2008

Mr. Will Ris
 Senior Vice President
 Government Affairs
American Airlines
 1101 17th Street, Suite 600
 Washington, DC 20036

(10 First)

Dear Mr. Ris:

For the past twelve years, the annual Caribbean Multi-National Business Conference has been instrumental in encouraging investment, cross-border trade and business partnerships, the role played by executives of major corporations, medium and small-size businesses and entrepreneurs, and deepens the connections with key elected officials.

This year, the Thirteenth Annual Conference is scheduled to be held in St. Maarten, November 6 - 9, 2008, and promises to further strengthen and expand on the work done by many of the Caribbean countries developing economies, in collaboration with the emerging markets initiatives in the U.S. The quality of the sessions and the high level of participation is now legendary, and is anxiously awaited each year.

Since Air Transportation is such a vital issue for the Caribbean Region, it is going to be one of the Agenda items in the travel & Tourism sector. Continental's success is vital to the Caribbean region and the US role in world travel; we would expect significant input into any initiatives discussed.

We expect to have elected officials of the US and the Caribbean, Civic Leaders and Business- persons who can influence policies and encourage worthwhile initiatives to be at the Conference. We would welcome American Airlines' participation.

The Host Committee in the Caribbean Region and the Planning Committee in the US have all agreed to honor you with the Conference's prestigious **Marcus Garvey Bridge Builders Award**. Should you agree to accept, we would ask Congressman Charles Rangel and Congresswoman Eddie Bernice Johnson to make the presentation to you.

We are open to our customary barter of tickets for sponsorship levels, and have enclosed a proposed arrangement guide similar to last year.

Organized by Carib News Foundation. A non-profit project 501-C3 corporation

09-4403 0151

05/15/2008 17:20 FAX

004

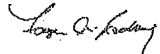
Enclosed is a Power Point presentation of the sponsorship opportunities the Conference provides, and also a program and recap of the 2006-2007 Conference. It is our sincere wish that this presentation motivates your sponsorship.

We would be happy to answer any questions you might have or to fill in any detail. I can be reached by e-mail: KBRodney@nycaribnews.com or (212) 944-1991.

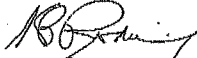
Because we know of your busy schedule, I will also follow up with your office to ascertain interest level.

Thanks for your kind consideration.

Best regards,



Faye A. Rodney
President



Karl B. Rodney
Publisher/CEO

We are expecting about 20 Members of Congress or more who will be attending along with other Civic Leaders and VIP's. Again, we will position American Airlines as one of the main carriers to the Caribbean transporting the elected officials and celebrities. To help us move the process along we would like to propose the following, that American Airlines participate as a **Gold Sponsor** of the conference in consideration for which American Airlines would receive the following:

- American Airlines will be recognized as a main sponsor.
- American Airlines name and logo will be included on all printed material.
- American Airlines will be included in all radio and television promotions.
- American Airlines will be in all Internet promotions.
- American Airlines will be a **designated sponsor** of a main event and/or a workshop with speaking opportunities.
- American Airlines will receive prominent space for display or exhibition.
- American Airlines banners will be displayed in the main conference area
- American Airlines can develop specific promotional materials.

In return for the above, American Airlines will provide *Carib News* with:

- **Maximum of fifty (50) roundtrip coach class tickets** from the 48 contiguous United States to Antigua. Reservations to be done by *Carib News* and ticketing to be by American Airlines.
- **Maximum of thirty-five (35) first-class roundtrip tickets** from the 48 contiguous United States to Antigua.
- **Maximum of five (5) coach class tickets and five (5) first class tickets** to be used for site inspection and conference planning prior to the conference.
- American Airlines will provide group fares for registered attendees. Fare and reservations & ticketing to be negotiated by American Airlines.

Site Inspection is part of the sponsorship package. We do plan to do site inspections in St. Maarten when we will officially announce the Conference and work out broad issues.

Organization Name	Meeting Cycle	Postponed	Tabular	Special Name	Amendment STA	BA	Lawyer A/c	Organization Date	Number	Number	PH	Transfer Name
GOVERNMENT AFFAIRS	7	SOA	PROVIA	Children STA Conference 2009	5264	327	141	4264	5264	PROVIA	LUDON	RODNEYE
GOVERNMENT AFFAIRS	7	SOA	PROVIA	Children STA Conference 2009	5265	327	141	4265	5265	PROVIA	LUDON	RODNEYE
GOVERNMENT AFFAIRS	7	SOA	PROVIA	Children STA Conference 2009	5266	327	141	4266	5266	PROVIA	LUDON	RODNEYE
GOVERNMENT AFFAIRS	7	SOA	PROVIA	Children STA Conference 2009	5267	327	141	4267	5267	PROVIA	LUDON	RODNEYE
GOVERNMENT AFFAIRS	7	SOA	PROVIA	Children STA Conference 2009	5268	327	141	4268	5268	PROVIA	LUDON	RODNEYE
GOVERNMENT AFFAIRS	7	SOA	PROVIA	Children STA Conference 2009	5269	327	141	4269	5269	PROVIA	LUDON	RODNEYE
GOVERNMENT AFFAIRS	7	SOA	PROVIA	Children STA Conference 2009	5270	327	141	4270	5270	PROVIA	LUDON	RODNEYE
GOVERNMENT AFFAIRS	7	SOA	PROVIA	Children STA Conference 2009	5271	327	141	4271	5271	PROVIA	LUDON	RODNEYE
GOVERNMENT AFFAIRS	7	SOA	PROVIA	Children STA Conference 2009	5272	327	141	4272	5272	PROVIA	LUDON	RODNEYE
GOVERNMENT AFFAIRS	7	SOA	PROVIA	Children STA Conference 2009	5273	327	141	4273	5273	PROVIA	LUDON	RODNEYE
GOVERNMENT AFFAIRS	7	SOA	PROVIA	Children STA Conference 2009	5274	327	141	4274	5274	PROVIA	LUDON	RODNEYE
GOVERNMENT AFFAIRS	7	SOA	PROVIA	Children STA Conference 2009	5275	327	141	4275	5275	PROVIA	LUDON	RODNEYE
GOVERNMENT AFFAIRS	7	SOA	PROVIA	Children STA Conference 2009	5276	327	141	4276	5276	PROVIA	LUDON	RODNEYE
GOVERNMENT AFFAIRS	7	SOA	PROVIA	Children STA Conference 2009	5277	327	141	4277	5277	PROVIA	LUDON	RODNEYE
GOVERNMENT AFFAIRS	7	SOA	PROVIA	Children STA Conference 2009	5278	327	141	4278	5278	PROVIA	LUDON	RODNEYE
GOVERNMENT AFFAIRS	7	SOA	PROVIA	Children STA Conference 2009	5279	327	141	4279	5279	PROVIA	LUDON	RODNEYE
GOVERNMENT AFFAIRS	7	SOA	PROVIA	Children STA Conference 2009	5280	327	141	4280	5280	PROVIA	LUDON	RODNEYE

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House ID	Registrant Name	Client Name	Filing Year	Filing Period	Lobbyist Full Name
311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2006	Year-End	Caine, Christopher
311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2006	Year-End	Caine, Christopher
311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2006	Year-End	Caine, Christopher
311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2007	Mid-Year	Caine, Christopher
311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION	INTERNATIONAL BUSINESS MACHINES CORPORATION	2007	Year-End	Caine, Christopher

09-4403 0156

311230000	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2007	Mid- Year	Caine, Christopher
311230000	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2007	Mid- Year	Caine, Christopher
311230000	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2008	1st Quarter	Caine, Christopher
311230000	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2008	2nd Quarter	Caine, Christopher
311230000	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2008	3rd Quarter	Caine, Christopher
311230000	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2008	4th Quarter	Caine, Christopher
311230000	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	(IBM) INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2009	1st Quarter	Edington, PJ
311230000	International Business Machines Corporation (IBM)	International Business Machines Corporation (IBM)	2005	Year- End	Caine, Christopher
401290000	QA Internal Test - New Database IBM	QA Internal Test - New Database IBM	2008	1st Quarter	None
401290000	QA Internal Test - New Database IBM	QA Internal Test - New Database IBM	2008		Last Name 01, First Name 01
401290000	QA Internal Test - New Database IBM	QA Internal Test - New Database IBM	2008	3rd Quarter	None

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House ID	Registrant Name	Client Name	Filing Year	Filing Period	Lobbyist Full Name
310520000	CITIGROUP, INC	CITIGROUP, INC	2006	Year-End	Burgeson, Christine
310520000	CITIGROUP, INC	CITIGROUP, INC	2007	Mid-Year	Burgeson, Christine
310520000	CITIGROUP, INC	CITIGROUP, INC	2007	Year-End	Burgeson, Christine
310520000	CITIGROUP, INC	CITIGROUP, INC	2007	Year-End	Burgeson, Christine
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2007	Mid-Year	None
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2007	Year-End	None
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2008	1st Quarter	None
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2008	2nd Quarter	None
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2008	3rd Quarter	None
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2008	4th Quarter	None
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2006	Year-End	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2007	Mid-Year	Snyder, John

09-4403 0158

316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2007	Year-End	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2008	1st Quarter	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2008	2nd Quarter	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2008	3rd Quarter	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2008	4th Quarter	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2009	1st Quarter	Snyder, John
373770000	CITIZENS FINANCIAL GROUP, INC.	CITIZENS FINANCIAL GROUP, INC.	2007	Mid-Year	Robinson, Ken
373770000	CITIZENS FINANCIAL GROUP, INC.	CITIZENS FINANCIAL GROUP, INC.	2007	Year-End	Robinson, Kenneth

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House ID	Registrant Name	Client Name	Filing Year	Filing Period	Lobbyist Full Name
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2006	Year-End	Davidson, Peter B.
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2007	Mid-Year	Davidson, Peter B.
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2007	Year-End	Davidson, Peter
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2008	1st Quarter	Davidson, Peter
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2008	2nd Quarter	Cantrel, Frank
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2008	3rd Quarter	Cantrel, Frank
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2008	4th Quarter	Davidson, Peter
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2009	1st Quarter	Cantrel, Frank
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2006	Year-End	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2007	Mid-Year	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2007	Year-End	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2008	1st	

09-4403 0160

Contributor	Company	Year	Quarter	Representative
352050000 VERIZON WIRELESS	VERIZON WIRELESS	2008	2nd Quarter	Brittingham, Donald
352050000 VERIZON WIRELESS	VERIZON WIRELESS	2008	3rd Quarter	Brittingham, Donald
352050000 VERIZON WIRELESS	VERIZON WIRELESS	2008	4th Quarter	Brittingham, Donald
352050000 VERIZON WIRELESS	VERIZON WIRELESS	2009	1st Quarter	Brittingham, Donald
315720000 Verizon & its affiliates, except Verizon Wireless	Verizon & its affiliates, except Verizon Wireless	2005	Year-End	Davidson, Peter
315720000 Verizon & its affiliates, except Verizon Wireless	Verizon & its affiliates, except Verizon Wireless	2006	Mid-Year	Davidson, Peter
352050000 Verizon Wireless	Verizon Wireless	2005	Year-End	Azare, Monica
352050000 Verizon Wireless	Verizon Wireless	2006	Mid-Year	Azare, Monica

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Exhibit 16



BASIC REQUIREMENTS

TO HOST

CARIBBEAN MULTI-NATIONAL BUSINESS CONFERENCE

- Invitation to host conference to be issued by Prime Minister (Head of Government). This is to facilitate the attendance of several elected officials from the United States, United Kingdom and other countries.
- Prime Minister to be keynote speaker at one of the major events of the conference and participate in the closed door session with attending elected officials.
- Local host committee to be organized with all interested ministers, agencies and associations. The chairman of this committee would be someone designated by the Prime Minister to coordinate all the activities.
- To provide the care and comfort for the VIP's attending i.e.
 - To provide 25 all-inclusive rooms for the VIP's and members of Congress attending;
 - To provide appropriate mode of transportation for VIP's and members of Congress - cars or specialized vans - not buses.
- To be a designated sponsor in one of the categories - *Title, Main or Regular Sponsor* (See Attachment)
- To organize a "Host Country Evening" - The Friday evening, the host country will host at an appropriate location an evening of food, refreshment, cultural presentation and entertainment.
- Provide for local entertainment for the various functions -
 - The Opening Ceremonies
 - The Reception
 - The Gala Dinner
- To assist in Promotion and Publicity of the conference both locally and through international offices and official publications.
- Assist in securing competitive hotel rates.
- Equip and staff conference secretariat.
- Prime Minister to issue invitations along with CARIB NEWS to members of the US Congress, other Prime Ministers and Ministers of Government.
- Participate in the Forum with Members of Congress.
- Arrange tours and activities of interest for VIP's and/or their spouse.

09-4403 0163

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THE NEW YORK
CARIBNEWS
 THE WEEKLY VOICE OF THE CARIBBEAN-AMERICAN COMMUNITY
 71 WEST 36TH STREET, NEW YORK, NY 10018 (212) 944-1991

August 13, 2008

The Hon. Sarah A. Wescott-Williams
 Leader of Government
 Government Administration Building
 Clam Labega Square, Philipsburg
 St. Maarten, N.A.

Hon. Commissioner:

Plans are moving ahead for the Thirteenth Annual Caribbean Multi-national Business Conference, November 6-9, in your beautiful country. We have sent out invitations to several Members of Congress, Prime Ministers, Presidents and Premiers, to attend the Conference. A list of those invitees is attached. Senator Hillary Clinton has expressed an interest and her invitation will be forwarded soon. Also see Congressman Rangel's personal note of acceptance.


We wish for you now to send out your invitation to these individuals as previously discussed. A copy of past invitation letters is included. We will continue to do all the follow-up as planning and implementation as agreed to.

We are working on the draft of the program and will be sharing it with you and the Host Committee shortly. We would like to schedule our first Conference meeting by telephons with the Host Committee within the next 10 days, to start going over each area of the basic requirements list, and to develop some time-line and contact person for each area.

We need to know immediately who on the Host Committee will be handling press and publicity, we can start sending Press Releases and Press updates.

We will be sending regular updates.

Kindest Regards



Karl B. Rodney
 Publisher/CEO

c.c. Commissioner Roy Marlin
 Director of Tourism, Regina LaBoga
 Marla Chénont



Taking Our Rightful Place In The Sun

09-4403 0164

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Carib News Foundation
 7 West 36th Street, 8th floor, New York, NY 10017
 Tel: (212) 944-1999; Fax: (212) 944-2089
 Email:

June 25, 2008

Commissioner Sarah Wescot-Williams
 Leader of Government Business
 Government Administration Building
 Clem Labega Square
 Philipsburg, St. Maarten, NA

Dear Commissioner Wescot-Williams:

Plans are coming in place for the Thirteenth Annual Caribbean Multi-national Business Conference scheduled for November 6-9 at your invitation to the beautiful country of St. Maarten.

We were very involved with the Conference on the Caribbean held in New York last week with some fifteen Heads of CARICOM Governments, which was a success, but took a large part of our time. All attention is now set for St. Maarten.

We have signed the contract with the Maho Resort and we are in conversation with many of our sponsors. Already we have some important names agreeing to come, including Congressman Charles Rangel and Governor of New York, David Paterson. We are mindful of the issues of interest to St. Maarten and so we have issued invitations to several Members of Congress, Heads of Education and Health Institutions. A strong financial sector is expected; already Citibank and HSBC are on board.

There is very strong interest in the conference and all the information about the conference as St. Maarten is now on the website, in print and on radio. The promotion has begun in earnest.

We would now wish to start liaison with the local host committee to coordinate our planning with yours. Could you be kind enough to please identify the committee and the contact person and other information. We would wish that the person would report to you directly or Commissioner Marlin to expedite any matter.

Please find attached ideas for the Theme and some areas of concentration from which we can develop the program. The Host Committee should use the basic requirement as the basis for their planning. We will send a matrix of some time line and arrange for our next planning visit.

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CN-000045

2008 CARIBBEAN MULTI-NATIONAL BUSINESS CONFERENCETHEMES

We are suggesting as possible themes, the following:

Please feel free to change, adjust or even new approaches.

CHANGING STRATEGIES TO EMBRACE NEW POSSIBILITIES - THE GLOBAL MARKET

MOVING BEYOND BARRIERS TO A STRATEGY FOR GLOBAL COMPETITIVENESS

CHANGING STRATEGIES, BUILDING ALLIANCES, FACING NEW REALITIES

A REGION IN TRANSITION - STRATEGY FOR CHANGE, ALLIANCE FOR PROGRESS

AREAS OF CONCENTRATION

We are also now shaping the presentations and the workshops and the areas of concentration are some of which were suggested by yourself and Commissioner Martin.

1) TOURISM

- Pre clearances
- Unfunded mandate by the US
- Investment in Tourism
- Health tourism
- Regional co-operation

2) HEALTH

- St. Maarten, ideal location for Regional Health Center
- Delivery of health care
- Lifestyle diseases - diabetes, hypertension, obesity
- Health investment
- Collaboration with US Institutions

3) EDUCATION

- Collaboration with US institutions
- Curriculum development
- Presentation of Thinkfinity - high tech tool for teaching
- Initiative between the University of the West Indies and Medgar Evers College

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Carib News Foundation
 7 West 26th Street, 3rd floor, New York, NY 10017
 Tel: (212) 944-3991, Fax: (212) 944-2089
 E-mail: info@caribnewsconference.com

To : Host Committee
 Caribbean Multi-National Business Conference
 cc: Bernard Hunt, Sonesta Maho Beach Resort

From : Karl B. Rodney
 CARIBNEWS

Date : October 15, 2008

SUBJECT : Town Hall Meetings

In the interest of organizing successful Town Hall Meetings, and to make program print deadline, we suggest the use of the space available at the Sonesta Maho for those meetings.

We think the participation of the local groups and individuals in these meetings are necessary and productive because of the subject matter. We would therefore urge a strong outreach media program and direct contact to interest groups to ensure success of the F014.

Thursday 5:00 - 6:30pm : Healthy Eating and Living

Friday 4:30 - 6:00pm : Education - Sharing Working Solutions

Saturday 4:30 - 6:00 pm : Technology

There is a great line up and we may have some additional star power. Commissioner Sarah Wescoat-Williams also suggested she might have additional local speakers for these for a, and we welcome that.

Thanks for your kind cooperation.

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09-4403 0167

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Carib News Foundation
 7 West 30th Street, 8th floor, New York, NY 10017
 Tel: (212) 944-9910 Fax: (212) 944-2089
 E-mail: info@caribnewsfoundation.com

February 8, 2008

Commissioner Sarah Westcott-Williams
 Leader of Government Business
 Government Administration Building
 Clem Labega Square
 Philipsburg, St. Maarten, NA

Dear Commissioner Westcott-Williams:

It is with great pleasure that I wish to inform you that the Planning Committee has selected St. Maarten to host the Thirtieth Annual Caribbean Multi-National Business Conference, November 6-9, 2008. There was great interest in St. Maarten because of your personal invitation issued in Antigua, and certainly all the other excellent facilities on the island.

We look forward to a great conference and with working with you and your team. We would wish that you appoint the Host Committee as soon as possible so that the real planning will start. We will be proposing some thematic approaches for your consideration, in order to get the right participants and targeted focus.

We have the proposal from the hotels and will be making that selection within the week, after which we can start the promotion. The *SAVE THE DATE* and *VENUE* will be going out to the Members of Congress shortly. We will develop a timeline for the other activities.

We are proceeding with the plan and would appreciate the formal letter of invitation.

We are very excited about working with you and St. Maarten again, and we expect a great conference.

Congratulations, and thanks for your kind consideration.

Very Truly Yours,

Faye A. Rodney

President

Karl B. Rodney
 Publisher/CEO

cc: Marla Chemont, Marketing Assistant

Organized by Carib News Foundation, A non-profit project 501-C3 CORPORATION

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Carib News Foundation
 7 West 30th Street, 8th floor, New York, NY, 10001
 Tel: (212) 944-1991; Fax: (212) 944-2089
 E-mail: info@caribnewsconference.com

January 23, 2008.

Commissioner Sarah Wescot-Williams
 Leader of Government Business
 Government Administration Building
 Clem Labega Square
 Philipsburg, St. Maarten, NA

Dear Commissioner Wescot-Williams:

Thanks very much for inviting us to St. Maarten to explore the possibility of St. Maarten as the Host Venue for the Thirteenth Annual Caribbean Multi-National Business Conference, scheduled for November 6-9, 2008.

We had the pleasure of meeting with Commissioner Roy Marlin to discuss the conference, its mission and of course, St. Maarten's priorities to be addressed in the conference. Among the areas discussed were:

- * The Passport issue and its impact on St. Maarten and the Caribbean
- * The US Pre-clearance option and what are the possibilities
- * Educational collaboration and in-state tuition consideration for students from St. Maarten
- * A major women's initiative at the conference and targeting many large corporations to hold meetings and conventions in St. Maarten
- * The influence on impact of the Congressional delegation on the current constitutional negotiations with the Dutch Government, particularly where the Dutch Government has lobbied these Members on their special interests
- * An appealing or special role model to address the youth of St. Maarten
- * To conduct community outreach programs involving the wider population in the areas of Health, Education and possibly Technology.

These are areas that we can establish direct linkages with elected officials, professional experts, corporate perspectives and certainly business opportunities.

We were reminded by Ludwig Ouenriche the then President of the Chamber of Commerce, that it was in St. Maarten that the issue of increase of Duty Free Allowance was raised and was subsequently raised to twice the amount within six months, benefiting all the merchants not only in St. Maarten but the Caribbean.

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Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10018
Tel: (212) 944-1991; Fax: (212) 944-2089
E-mail: info@caribnewsconference.com

April 04, 2008

Ms. Marilyn Johnson
VP Marketing Development
IBM Corporation
1133 Westchester Avenue
White Plains, NY 10604

*Copy of [unclear]
- copy of [unclear]
- copy of [unclear]*

Dear Ms. Johnson:

For the past twelve years, the annual Caribbean Multi-National Business Conference has been instrumental in encouraging investment, cross-border trade and business partnerships, the role played by executives of major corporations, medium and small-size businesses and entrepreneurs, and deepens the connections with key elected officials.

Your support and that of IBM went a long way to make the conference a success, and has fostered on-going growth in business achievements and impactful policy decisions. We appreciate very much the professionalism and enthusiasm you bring to the Conference with your keen participation. The presence and demonstration of real live "IBM Partner" as a result of the conference is a powerful testimony. We do get concrete results and expressed appreciation of new opportunities.

We can assure you that all the key stakeholders, Members of Congress, Heads and Ministers of Government, Elected Officials, Community and Business Leaders are all aware and appreciative of IBM's participation in this very important mission.

This year, the Thirteenth Annual Conference is scheduled to be held in St. Maarten, November 6 - 9, 2008, and promises to further strengthen and expand on the work done by many of the Caribbean countries developing economies, in collaboration with the emerging markets initiatives in the U.S. The quality of the sessions and the high level of participation is now legendary, and is anxiously awaited each year.

Enclosed is a Power Point presentation of the sponsorship opportunities the Conference provides, and also a program and recap of the 2006-2007 Conference. We know of your interest to deepen the IBM local, regional and global connection, and I know the Conference can achieve that. It is our sincere wish that this presentation motivates your sponsorship.

3

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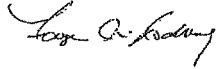
- 2 -

We would be happy to answer any questions you might have or to fill in any detail. I can be reached by e-mail: KBRodney@mycaribnews.com or (212) 944-1991.

Because we know of your busy schedule, I will also follow up with your office to ascertain interest level.

Thanks for your kind consideration.

Best regards,



Faye A. Rodney
President



Karl B. Rodney
Publisher/CEO

(4)

MAIL TO US ONLY

V.V.L. WICKMIZIE

7/16/2008

PA


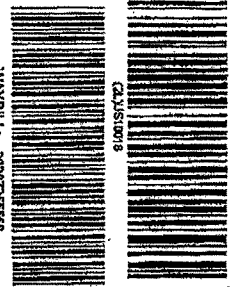
CARIB NEWS INC.
7 WEST 36TH STREET
8TH FLOOR
NEW YORK, 10018
212-944-1991


Invoice

Date	Invoice #
7/16/2008	45122

Bill To
Wanda McKenzie IBM 2607 Jesters Court Marietta, GA 30068

Description	Amount
Sponsorship Multi-National Business Conference 2008 TAX ID 13-362060	20,000.00
Total 6	
\$20,000.00	

		EXP		History: 1/1	
FROM: 115 MC CO TROWL 0438 C/O JAMES D. LOGISTICS 11400 BURDET RD AUSTIN, TX 78738		ORIGIN: ILE		POST CODE: 10018	
TO: UNITED STATES PERIODICALS JAMES CARROLL NEWS, INC. 7 WEST 38TH STREET, 8TH FLOOR NEW YORK, NY 10018 UNITED STATES		TEL: 212-944-1991			
Description: IBM check		Weight: 1.08 Date: 2008-10-28		JRAC 0T ABH	
CHL standard name and address apply					
		CAJLS10018			
MAIN BILL: 2328725550 (View Inquiries)					

		Check Number: 000377521	
International Business Machines Corporation 1900 Park Tower, New York, NY 10160-5503		DATE: 2008/10/28	
Pay to the order of: NEW YORK CARIS NEWS 7 W 38TH ST 6TH FL NEW YORK, NY 10018 UNITED STATES		The sum of Pay \$*****20,000.00**	
		For <i>Richard J. Carroll</i> Authorized signature	

000377521 *021304379*601825847*

7

Exhibit 17

Registration

From: plouis@plouis@nycanonews.com
 Sent: Monday, October 18, 2007 11:00 AM
 To: 'Kelly Mobley, Dawn'
 Subject: RE: Carib News - Pre-Trip Approval Issues

Ms. Olson,
 In response to your e-mail, the answer to your question is NO.

Regards and Thanks for your patience.

Patricia Louis
 Executive Assistant
 CARIB NEWS
 7 West 38th Street, 8th Floor
 New York, NY 10018

----- Original Message -----
 From: Kelly Mobley, Dawn (mailto:Dawn.Kelly.Mobley@mail.house.gov)
 Sent: Monday, October 15, 2007 10:28 AM
 To: plouis
 Subject: FW: Carib News - Pre-Trip Approval Issues

FYI

From: Olson, Susan
 Sent: Friday, October 12, 2007 2:41 PM
 To: plouis
 Cc: Kelly Mobley, Dawn; DiReilly, Bill
 Subject: RE: Carib News - Pre-Trip Approval Issues

Ms. Louis,

Please explain in more detail your email message below relative to the "sponsors contribute to the overall expense of the trip." In this regard, do the following entities pay for any of the expenses of the trip for the invited House Members, including roundtrip air transportation costs; lodging costs; meal costs; cost of a particular meal or reception, etc.?

- o Antigua Government
- o Sandals
- o Royal Caribbean Bakery
- o CITI
- o Pfizer
- o Macy's
- o AT&T
- o HSBC
- o IBM

10/15/2007

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- o GoodWorks International
- o Preferred Health Partners
- o Antigua & Barbuda
- o American Airlines
- o Golden Krust

Susan L. Olson

Counsel

House Committee on Standards of Official Conduct

HT-2, The Capitol Building

Washington, DC 20515

Phone: 202-225-7103

Fax: 202-225-7392

From: piouls [mailto:piouls@nycaribnews.com]
 Sent: Thursday, October 11, 2007 10:37 AM
 To: Olson, Susan
 Subject: RE: Carib News - Pre-trip Approval Issues

Ms. Olson,

In response to your e-mail:

The sponsors contribute to the overall expense of the trip and the general work of the Foundation.

As a courtesy, each contributor is given an opportunity to be attached to a part of the program

that is being presented. They do not determine the content of the other participants in the

Conference.

Federally registered lobbyists or foreign agents will not be accompanying the Members or participating in the program.

Regards,

Patricia Lewis
 Executive Assistant
 CARIB NEWS
 7 West 38th Street, 8th Floor
 New York, NY 10018

-----Original Message-----
 From: Olson, Susan [mailto:Susan.Olson@mail.house.gov]
 Sent: Wednesday, October 10, 2007 4:01 PM
 To: piouls@nycaribnews.com
 Cc: Dawn.KellyMoley@mail.house.gov; O'Reilly, Bill

10/15/2007

09-4403 0176

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CN-000054

Subject: Carib News - Pre-trip Approval Issues

Dear Mrs. Louis:

With regard to the pre-trip approval requests for the Carib News Foundation's (Foundation) trip to Antigua, the issues involving sponsorship are as follows:

While the sponsor form that you completed indicates that the Foundation is the sole sponsor of the 2007 trip, the draft schedule, however, indicates that the following entities are "sponsoring" sessions, events, etc. during this trip:

- o Antigua Government
- o Saldals
- o Royal Caribbean Bakery
- o CITI
- o Pfizer
- o Macy's
- o AT&T
- o HSBC
- o IBM
- o Goodworks International
- o Preferred Health Partners
- o Antigua & Barbuda
- o American Airlines
- o Golden Krust

Last year the Foundation provided the following information regarding these "additional sponsors" for the November 9 to 12, 2006 trip:

The Foundation, which is a 501(c)(3) nonprofit organization, will be paying for the Members' travel expenses including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a "contribution to the overall pool of expenses in contribution to the Foundation," which is used to "underwrite the overall expenses of the Conference," primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organization who will be attending and participating in the Conference.

Accordingly, the Committee's Advisory Opinion, dated October 27, 2006, provided that all of the organizations that provided financial underwriting for the trip along with the Foundation were required to be listed as the "trip sponsors" on the participating Members' post-travel disclosure form and their 2006 annual financial disclosure statements.

Accordingly, you need to provide information describing the role of these "additional sponsors" as listed in the 2007 trip draft schedule for this current trip. Without such information, I cannot proceed with the review of the pre-trip approval requests for the Foundation's Antigua trip.

10/15/2007

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01/000000

Susan L. Olson

Counsel

House Committee on Standards of Official Conduct

HT-2, The Capitol Building

Washington, DC 20515

Phone: 202-225-7103

Fax: 202-225-7392

10/15/2007

09-4403 0178

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CM000066



**THE NEW YORK
CARIB NEWS**
THE WEEKLY VOICE OF THE CARIBBEAN-AMERICAN COMMUNITY
7 WEST 34TH STREET 43 FLOOR, NEW YORK, NY 10018

TELE: (212) 944-1921, FAX: (212) 944-2089
E-MAIL ADDRESSES: NYCARIB@AOL.COM;
CARIBNEWS@ATT.NET

FACSIMILE TRANSMITTAL SHEET

TO:	Susan Olsen	FROM:	R. Louis
COMPANY:	House Comm. on Standards	DATE:	10/12/01
FAX NUMBER:	202-225-7392	TOTAL NO. OF PAGES INCLUDING COVER:	
RE:	Travel Certification Form		

URGENT CORRECTION PLEASE COMMENT PLEASE REPLY YOUR INFORMATION

Ms. Olsen,
In response to your e-mail - the Conference is paid for by CARIB NEWS FOUNDATION.

The companies are participants. They are not sponsors or co-sponsors for any part of the trip and play no role in the planning or content.

The program has been amended to reflect the companies as Participants.

I regret the misunderstanding and thank you for your patience as I go through and grow through this process, which is new to me.

I look forward to hearing from you.

Regards

09-4403 0179

CONFIDENTIAL

01-000000

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Friday, October 12, 2007 4:50 PM
To: plouis
Subject: RE: Confidential

The fax did not come through. I will be stepping out of the office for the remainder of the day, but will be in early Monday. Please follow up again with Susan. I have explained that the organizations you labeled as co-sponsors are not. They support your foundation annually, but have not and will not pay for the Members trip. This is simply a misunderstanding of the terms "sponsor", "contributor", and "participant" as used in the Ethics rules which is why I sent you the Rules book for preparation.

Once you are able to clarify these issues and make sure your itinerary passes too, you should be fine. An Ethics Committee Staff Attorney must review and approve as well. Your Staff Attorney is Susan.

From: Kelly Mobley, Dawn
Sent: Friday, October 12, 2007 11:55 AM
To: plouis
Subject: RE: Confidential

Have you spoken with your Director and explained the problem so you can call Olson asap?

From: Kelly Mobley, Dawn
Sent: Friday, October 12, 2007 9:59 AM
To: plouis
Subject: FW: Confidential

Please read both emails below. Give Susan a call as soon as you work through the kinks, let her know you are following up. Please make yourself available to work through this matter today. Thank you Patricia. (These other organizations can participate in the program but should not help pay for the trip).

From: Olson, Susan
Sent: Friday, October 12, 2007 9:29 AM
To: O'Reilly, Bill; Kelly Mobley, Dawn
Subject: FW: Carib News - Pre-Trip Approval Issues

Bill and Dawn,
 Please note the following response from Ms. Louis at Carib News. Unfortunately, it appears that if each sponsor contributes funding directly to the trip (an earmark of funds) and not simply to the general funds of Carib News, then the assumption is that all of these entities are co-sponsors of the trip for purposes of the House travel rules. If that is the case and since it is likely that at least one of these co-sponsors hires or retains a federally registered lobbyist, the trip could only be a one-day event trip. Thus the Committee can't approve the trip as it currently exists.

But, if you have a different interpretation of the below information from Ms. Louis, please do let
 10/12/2007

09-4403 0180

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me know. Thanks! Susan

Susan L. Olson

Counsel

House Committee on Standards of Official Conduct

HT-2, The Capitol Building

Washington, DC 20515

Phone: 202-225-7103

Fax: 202-225-7392

From: plouis [mailto:plouis@nycarbnews.com]
 Sent: Thursday, October 11, 2007 10:53 AM
 To: Olson, Susan
 Subject: RE: Carib News - Pre-trip Approval Issues

Ms. Olson,

In response to your e-mail:

The sponsors contribute to the overall expense of the trip and the general work of the Foundation.

As a courtesy, each contributor is given an opportunity to be attached to a part of the program

that is being presented. They do not determine the content or the other participants

in the

Conference.

No federally registered lobbyist or foreign agent will be accompanying the Members

or participating in the program.

Regards

Patricia Lovik
 Executive Assistant
 CARIB NEWS
 7 West 36th Street, 8th Floor
 New York, NY 10018

-----Original Message-----
 From: Olson, Susan [mailto:susan.olson@mail.house.gov]
 Sent: Wednesday, October 10, 2007 4:01 PM
 To: plouis@nycarbnews.com
 Cc: Dawn.KellyMoble@mail.house.gov; O'Rally, Bill
 Subject: Carib News - Pre-trip Approval Issues

Dear Mrs. Louis:

With regard to the pre-trip approval requests for the Carib News Foundation's

10/12/2007

09-4403 0181

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CONFIDENTIAL

(Foundation) trip to Antigua, the issues involving sponsorship are as follows:

While the sponsor form that you completed indicates that the Foundation is the sole sponsor of the 2007 trip, the draft schedule, however, indicates that the following entities are "sponsoring" sessions, events, etc. during this trip:

- o Antigua Government
- o Sandals
- o Royal Caribbean Bakery
- o CITI
- o Pfizer
- o Macy's
- o AT&T
- o HSBC
- o IBM
- o Goodworks International
- o Preferred Health Partners
- o Antigua & Barbuda
- o American Airlines
- o Golden Krust

Last year the Foundation provided the following information regarding these "additional sponsors" for the November 9 to 12, 2006 trip:

The Foundation, which is a 501(c)(3) nonprofit organization, will be paying for the Members' travel expenses including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a "contribution to the overall pool of expenses in contribution to the Foundation," which is used to "underwrite the overall expenses of the Conference," primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organization who will be attending and participating in the Conference.

Accordingly, the Committee's Advisory Opinion, dated October 27, 2006, provided that all of the organizations that provided financial underwriting for the trip along with the Foundation were required to be listed as the "trip sponsors" on the participating Members' post-travel disclosure form and their 2006 annual financial disclosure statements.

Accordingly, you need to provide information describing the role of these "additional sponsors" as listed in the 2007 trip draft schedule for this current trip. Without such information, I cannot proceed with the review of the pre-trip approval requests for the Foundation's Antigua trip.

Susan L. Olson

Counsel

House Committee on Standards of Official Conduct

10/12/2007

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CM 000000

HJ-2, The Capitol Building
Washington, DC 20515
Phone: 202-225-7103
Fax: 202-225-7392

10/12/2007

09-4403 0183

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1101



THE NEW YORK CARIBNEWS
THE WEEKLY VOICE OF THE CARIBBEAN-AMERICAN COMMUNITY
7 WEST 86TH STREET, 4th FLOOR, NEW YORK, NY 10018

TEL: (212) 944-1991; FAX: (212) 944-2039
E-MAIL ADDRESS: NYCARIB@AOL.COM
CARIBNEWS@ATT.NET

FACSIMILE TRANSMITTAL SHEET

TO: Dawn Kelly Mobley	FROM: P. Louis
COMPANY: Ethics Counsel for Cong. Stephanie Tubbs Jones	DATE: 10/11/97
FAX NUMBER: 202-225-7392	TOTAL NO. OF PAGES INCLUDING COVER:
RE: Travel Form	

URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY YOUR INFORMATION

Further to our conversations of this morning, following is the Travel Certification Form ..

The Conference is paid for by the Carib News Foundation. The companies are participants, are not sponsors or co-sponsors for any part of the trip and play no role in the planning or content.

The program has been amended to reflect the companies as Participants.

I regret the mis-understanding and thank you for holding my hand as I go through and grow through this process which is new to me.

Kindly review and advise before I send to Ms. Olsen.

I look forward to hearing from you.

09-4403 0184

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CN.000062

Registration

From: Thomas, Shelley [Shelley.Thomas@mail.house.gov]
Sent: Thursday, October 11, 2007 7:47 AM
To: plouis
Subject: RE: Carib News - Pre-trip Approval Issues

This is new territory since we never had to go through this before. I don't have an answer and I already turned in Donna's forms.

From: plouis [mailto:plouis@nycaribnews.com]
Sent: Wednesday, October 10, 2007 3:56 PM
To: Kelly Mobley, Dawn Thomas, Shelley Bailey, George
Subject: FW: Carib News - Pre-trip Approval Issues

Please see e-mail I received from Ms. Olson of the Committee on Standards of Official Conduct.

A possible response could be: The sponsors contribute to the overall expense of the trip and the general work of the Foundation. As a courtesy, each contributor is given an opportunity to be attached to a part of the program that is being presented. They do not determine the content or the other participants in the Conference.

Please advise us.

Regards and Thanks

Patricia Lovitt
 Executive Assistant
 CARIB NEWS
 7 West 36th Street, 8th Floor
 New York, NY 10018

-----Original Message-----
From: Olson, Susan [mailto:Susan.Olson@mail.house.gov]
Sent: Wednesday, October 10, 2007 4:01 PM
To: plouis@nycaribnews.com
Cc: Dawn, Kelly Mobley@mail.house.gov; O'Reilly, Bill
Subject: Carib News - Pre-trip Approval Issues

Dear Mrs. Lovitt:

With regard to the pre-trip approval requests for the Carib News Foundation's (Foundation) trip to Antigua, the issues involving sponsorship are as follows:

While the sponsor form that you completed indicates that the Foundation is the sole sponsor of the 2007 trip, the draft schedule, however, indicates that the following entities are "sponsoring"

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sessions, events, etc. during this trip:

- o Antigua Government
- o Sandals
- o Royal Caribbean Bakery
- o CITI
- o Pfizer
- o Macy's
- o AT&T
- o HSBC
- o IBM
- o Goodworks International
- o Preferred Health Partners
- o Antigua & Barbuda
- o American Airlines
- o Golden Kiosk

Last year the Foundation provided the following information regarding these "additional sponsors" for the November 9 to 12, 2006 trip:

The Foundation, which is a 501(b)(3) nonprofit organization, will be paying for the Members' travel expenses including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a "contribution to the overall pool of expenses in contribution to the [Foundation]," which is used to "underwrite the overall expenses of the Conference," primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organization who will be attending and participating in the Conference.

Accordingly, the Committee's Advisory Opinion, dated October 27, 2006, provided that all of the organizations that provided financial underwriting for the trip along with the Foundation were required to be listed as the "trip sponsors" on the participating Members' post-travel disclosure form and their 2006 annual financial disclosure statements.

Accordingly, you need to provide information describing the role of these "additional sponsors" as listed in the 2007 trip draft schedule for this current trip. Without such information, I cannot proceed with the review of the pre-trip approval requests for the Foundation's Antigua trip.

Suzanne L. Neenan
 Counsel
 House Committee on Standards of Official Conduct
 HT-2, The Capitol Building
 Washington, DC 20515
 Phone: 202-225-7103
 Fax: 202-225-7392

09-4403 0186

CONFIDENTIAL

CN 000004

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Wednesday, October 10, 2007 6:49 PM
To: plouls@nycaribnews.com
Subject: Re: Carib News - Pre-trip Approval Issues

Her question centers on whether any of these co-sponsors' refer to a lobbyist or foreign. This is the issue you and I focused on previously. It is a central problem if any do and are paying for the events. If so, you are in the same position as last year with one-day events. Call Susan back tomorrow as early as possible. Hopefully, these co-sponsors don't retain lobbyists, but you should have their representations on this matter. At a minimum, Macy's does, right? Alternatively, if they are only sponsoring event tables or the like, a lobbyist will not be problematic.

Spit using BlackBerry

-----Original Message-----
From: plouls@nycaribnews.com
To: Kelly Mobley, Dawn; Thomas, Shelley; Palley, George
Sent: Wed, Oct 10, 2007 5:25 PM
Subject: FW: Carib News - Pre-trip Approval Issues

Please see e-mail I received from Ms. Olson of the Committee on Standards of Official Conduct.

A possible response could be: The sponsors contribute to the overall expense of the trip and the general work of the Foundation. As a courtesy, each contributor is given an opportunity to be attached to a part of the program that is being presented. They do not determine the content or the other participants in the Conference.

Please advise us.

Regards and Thanks

Patricia Louis
Executive Assistant
CARIBNEWS
4 West 36th Street, 8th Floor
New York, NY 10018

-----Original Message-----
From: Olson, Susan [mailto:Susan.Olson@mail.house.gov]
Sent: Wednesday, October 10, 2007 4:01 PM

09-4403 0187

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NO. CARIB NEWS - Pre-trip Approval Issues

Page 2 of 3

To: plouis@caribnews.com
 Cc: Dawn Kelly Mobley@mail.house.gov; O'Reilly, Bill
 Subject: Carib News - Pre-trip Approval Issues

Dear Mrs. Louiss,

With regard to the pre-trip approval requests for the Carib News Foundation's (Foundation) trip to Antigua, the issues involving sponsorship are as follows:

While the sponsor form that you completed indicates that the Foundation is the sole sponsor of the 2007 trip, the draft schedule, however, indicates that the following entities are "sponsoring" sessions, events, etc. during this trip:

- o Antigua Government
- o Sandals
- o Royal Caribbean Bakery
- o GHI
- o Pfizer
- o Macy's
- o AT&T
- o HSBC
- o IBM
- o Goodworks International
- o Preferred Health Partners
- o Antigua & Barbuda
- o American Airlines
- o Golden Krust

Last year the Foundation provided the following information regarding these "additional sponsors" for the November 9 to 12, 2006 trip:

The Foundation, which is a 501(c)(3) nonprofit organization, will be paying for the Members' travel expenses including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a "contribution to the overall pool of expenses in contribution to the [Foundation]" which is used to "underwrite the overall expenses of the Conference," primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organization who will be attending and participating in the Conference.

Accordingly, the Committee's Advisory Opinion, dated October 27, 2006, provided that all of the organizations that provided financial underwriting for the trip along with the Foundation were required to be listed as the "trip sponsors" on the participating Members' post-travel disclosure form and their 2006 annual financial disclosure statements.

10/10/2007

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Accordingly, you need to provide information describing the roles of these "additional sponsors" as listed in the 2007 trip draft schedule for this current trip. Without such information, I cannot proceed with the review of the pre-trip approval requests for the Foundation's August trip.

Susan L. Olson
Counsel
House Committee on Standards of Official Conduct
RT-2, The Capitol Building
Washington, DC 20515
Phone: 202-225-7103
Fax: 202-225-7392

10/10/2007

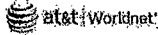
09-4403 0189

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ONL000067

From: Shelley Thomas

Page 1 of 1



(Email) [Close]

From: "Thomas, Shelley" <Shelley.Thomas@mail.house.gov>
 "James, Corliss" <Corliss.James@mail.house.gov>, "Long, Keryn" <Keryn.Long@mail.house.gov>,
 "Bishop, Mary" <Mary.Bishop@mail.house.gov>, "Chaplin, Jenise"
 <Jenise.Chaplin@mail.house.gov>, "Pickens, Crystal" <Crystal.Pickens@mail.house.gov>, "Hamlett,
 Doreen" <Barbara.Hamlett@mail.house.gov>, "Hendricks, Jasper"
 <Jasper.Hendricks@mail.house.gov>, "Dalley, Katie" <Katie.Dalley@mail.house.gov>,
 "GAO4Scheduling" <GAO4Scheduling@mail.house.gov>, "Murray, Darlene"
 <Darlene.Murray@mail.house.gov>, "Fisher, Pat" <Pat.Fisher@mail.house.gov>, "Featherston,
 Wendy" <Wendy.Featherston@mail.house.gov>, "Pittman, Megan" <MPittman@mail.house.gov>,
 "King, Lalla" <Lalla.King@mail.house.gov>, "Resendez, Marlene"
 <Marlene.Resendez@mail.house.gov>, "Kellings, Talyana" <Talyana.Kellings@mail.house.gov>,
 "Taylor, Gerrit" <Gerrit.Taylor@mail.house.gov>, "Anderson, Kwamime (Water)"
 <Kwamime.Anderson@mail.house.gov>, "Howie, Elisa" <Elisa.Howie@mail.house.gov>, "Borja,
 Angie" <Angie.Borja@mail.house.gov>, "Roddley, Raven" <raven.roddley@mail.house.gov>,
 "Waskow, Jean" <Jean.Waskow@mail.house.gov>, "Holmes, Alice M."
 <Alice.M.Holmes@mail.house.gov>, "Epps, Nikana" <Nikana.Epps@mail.house.gov>, "Johnson, Aya"
 <Aya.Johnson@mail.house.gov>
 Cc: <carib-desk@att.net>
 Subject: Emailing 110th rule change page
 Date: Thu, 4 Oct 2007 16:36:27 +0000

To the CNO Members who indicated a "yes" or "maybe" in attending the
 Carib News Foundation Business Conference in Antigua, British West
 Indies on November 8-11 of 2007, I have attached the web site for the
 travel form that must be submitted by members no later than **TUESDAY,**
 October 9 to the Ethics Committee. I will be bringing copies of the
 agenda, as well as copies of the ethics form that Carib News had to
 complete and submit to Ethics, to all of the offices indicated above,
 today and tomorrow by noon. If anyone has any questions, please call me
 at 5-1790. PLEASE MAKE SURE THAT MEMBERS HAVE THEIR OFFICIAL PASSPORT,
 AS WE ARE GOING TO A FOREIGN COUNTRY.

The message is ready to be sent with the following file or link
 attachments:

shortcut to: http://www.house.gov/ethics/110th_rule_change_page.htm

NOTE: To protect against computer viruses, e-mail programs may prevent
 sending or receiving certain types of file attachments. Check your
 e-mail security settings to determine how attachments are handled.
 <<110th_rule_change_page.url>>

Attachment 1: 110th_rule_change_page.url (application/octet-stream)

09-4403 0190

<http://webmail.att.net/winc/winc/47056C17000D0D2F00002DBD2160376223059C0A0B...> 10/4/2007

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New Travel Regulations, Forms, and Instructions (effective March 1, 2007):

The House Rules for the 110th Congress changed the travel rules for Members, staff, and outside sponsors. Regulations, forms, and instructions governing privately-sponsored travel taking place after March 1, 2007 are available below. An Advisory Memorandum providing additional guidance regarding travel was released on March 13, 2007. New versions of the forms relating to privately-sponsored travel were released April 6, 2007.

- [Travel Guidelines and Regulations](#)
- [Instructions and Certification Form to be filled out by Private Sponsors](#)
- [Traveler Form to be filled out by Members, Officers, and Employees](#)
- [Post-Travel Disclosure Form for Members and Officers](#)
- [Post-Travel Disclosure Form for Employees](#)

Please note: Both the Private Sponsor Certification and the Member/Officer/Employer Traveler Forms must be filed with the Committee at the same time in order to process your request.

New Gift Rule Changes:

The House Rules for the 110th Congress amended House Rule 25, clause 3 (the "gift rule") with respect to the acceptance of gifts and travel. Some of the guidance on this website regarding gifts and travel may therefore no longer apply. On February 6, 2007, the Committee issued an advisory memorandum on the changes to the gift rule. On May 24, 2007, the House amended the gift rule exception concerning the acceptance of offers of free attendance at charity events. In view of the amendment, on June 14, 2007, the Committee issued a revised memorandum that incorporates the change to the rule. Please contact Committee staff at 202-225-7103 with any questions.

Financial Interests under New Earmark Rules

The House Rules for the 110th Congress changed the Code of Official Conduct regarding earmarks. This provision requires that a Member, Delegate, or Resident Commissioner who requests an earmark of a limited tax or tariff benefit to provide certain information regarding the request and its purpose to the committee of jurisdiction. An Advisory Memorandum providing guidance in this matter was released on March 27, 2007.

09-4403 0191

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Registration

From: Smith, Hillary [Hillary.Smith@mail.house.gov]
Sent: Thursday, October 04, 2007 4:32 PM
To: plouls@nycarbnews.com
Subject: Travel Approval Forms for Antigua Trip

Patricia,

Here is what I need fixed --

12 -- Describe the role of each sponsor in organizing and conducting this trip -- The answer should say something about how Carib News organized, planned, pulled together the invitee list and chose the destination.

13 -- Describe the organizational interest -- It is the Carib News Annual conference.

The revised forms, along with the list of invitees, should be sent to each invitee to they send to the committee so that we do not receive the wrong forms from the Congressional offices. Let me know if you have any questions.

Hillary Smith

Committee on Standards of Official Conduct

ATT-2, The Capitol

Washington, DC 20515

202-226-7103

10/4/2007

09-4403 0192

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CM 00070

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
 Sent: Wednesday, October 03, 2007 2:02 PM
 To: plouis
 Subject: RE: Please read query below

Ignore the last email b/c we are working to meet the 30-day submission. Just stand by so we can get back in touch today; have it all resolved tomorrow, Monday is a holiday.

From: Kelly Mobley, Dawn
 Sent: Wednesday, October 03, 2007 12:39 PM
 To: plouis
 Subject: RE: Please read query below

Thank you. We have assigned your review to Staff Attorney Susan Olsch. Please reach her by phone at 202/226-8808 next week if she has not reached out to you. She will need a few days of review. Thank you very much.

From: plouis [mailto:plouis@nycarbnews.com]
 Sent: Monday, October 01, 2007 5:40 PM
 To: Kelly Mobley, Dawn
 Subject: RE: Please read query below

The Conference dates are November 8-11, 2007, and opens on Thursday November 8 and ends the morning of November 11, 2007 - (3 nights)

CARIE NEWS FOUNDATION is the Sponsor of the event.

Item No. 12: The companies like Pfizer, AT&T are donors/contributors of grants to the Foundation for educational purposes and **NOT** the SPONSOR, consequently I assume the information contained in that item will have to be changed.

Awaiting your advice.

Regards

Patricia Louie
 Executive Assistant
 CARIE NEWS
 7 West 58th Street, 8th Floor
 New York, NY 10018

-----Original Message-----
 From: Kelly Mobley, Dawn [mailto:Dawn.KellyMobley@mail.house.gov]
 Sent: Monday, October 01, 2007 5:10 PM

10/3/2007

09-4403 0193

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Registration

From: piculs [piculs@nycaribnews.com]
 Sent: Monday, October 01, 2007 8:40 PM
 To: Kelly Mobley, Dawn
 Subject: RE: Please read query below

The Conference dates are November 8-11, 2007, and opens on Thursday, November 8, and ends the morning of November 11, 2007. (3 nights)

CARIE NEWS FOUNDATION is the Sponsor of the event.

Item No. 12: The companies like Pfizer, AT&T are donors/contributors of grants to the FOUNDATION for educational purposes and **NOT** the SPONSOR, consequently I assume the information contained in that item will have to be changed.

Awaiting your advice.

Regards

Patricia Louis
 Executive Assistant
 CARIE NEWS
 7 West 36th Street, 8th Floor
 New York, NY 10018

-----Original Message-----

From: Kelly Mobley, Dawn [mailto:Dawn.KellyMobley@mail.house.gov]
 Sent: Monday, October 01, 2007 5:10 PM
 To: piculs
 Subject: RE: Please read query below.

From: Kelly Mobley, Dawn
 Sent: Monday, October 01, 2007 5:08 PM
 To: Kelly Mobley, Dawn
 Subject: RE: Query

We are trying to work through a problem in approving the co-sponsors piece. Are they each paying for a one-day, widely attended event or more days? Please read the Giff Rules I forwarded you on this matter.

From: Kelly Mobley, Dawn
 Sent: Tuesday, September 25, 2007 12:42 PM
 To: piculs

10/1/2007

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Please forward the paperwork as well to the Chairwoman's personal office so her scheduler can complete the work from that office. Please get it to Lalla King today. Her fax number is 202/225-4339. She has to complete the Member's forms and meet the same deadline.

From: plouls [mailto:plouls@nycaribnews.com]
Sent: Monday, October 01, 2007 6:40 PM
To: Kelly Mobley, Dawn
Subject: RE: Please read query below

The Conference dates are November 8-11, 2007, and opens on Thursday November 8 and ends the morning of November 11, 2007. (3 nights)

CARIB NEWS FOUNDATION is the Sponsor of the event.

Item No. 12: The companies like Pfizer, AT&T are donors/contributors of grants to the Foundation for educational purposes and NOT the SPONSOR, consequently I assume the information contained in that item will have to be changed.

Awaiting your advice.

Regards

DARREN LOUIS
Executive Assistant
CARIB NEWS
7 West 36th Street, 8th Floor
New York, NY 10018

----- Original Message -----
From: Kelly Mobley, Dawn [mailto:Dawn.KellyMobley@mail.house.gov]
Sent: Monday, October 01, 2007 5:10 PM
To: plouls
Subject: RE: Please read query below

09-4403 0195

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Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Monday, October 01, 2007 6:10 PM
To: plouls
Subject: RE: Please read query below

From: Kelly Mobley, Dawn
Sent: Monday, October 01, 2007 5:03 PM
To: Kelly Mobley, Dawn
Subject: RE: Query

We are trying to work through a problem in approving the co-sponsors place. Are they each paying for a one-day, widely attended event or more days? Please read the Gift Rules I forwarded you on this matter.

From: Kelly Mobley, Dawn
Sent: Tuesday, September 25, 2007 12:42 PM
To: 'plouls'
Subject: Query

I am working through your forms before leaving them with our staff attorney and have a question. Query: Why did you not list CARLE NEWS as the sponsor as you'd indicated instead of Macy's, etc. The official sponsor for travel, lodging, and planning is still Carle News, correct?

From: Kelly Mobley, Dawn
Sent: Tuesday, September 18, 2007 12:57 PM
To: 'plouls'
Subject: RE: Draft Program - 2007 Business Conference (No agenda or program attached)

When you send the draft agenda, please also forward any information on your sponsor's status. If it cannot be a lobbyist. Do you need a copy of the new travel rules?

From: Kelly Mobley, Dawn
Sent: Monday, September 17, 2007 6:53 PM
To: 'plouls'
Subject: RE: Draft Program - 2007 Business Conference

Nothing was attached to this email. Therefore, we have not received the proposed agenda you mention below and have nothing to preview.

From: plouls [mailto:plouls@nycarlnews.com]
Sent: Monday, September 17, 2007 3:47 PM
To: Kelly Mobley, Dawn
Subject: Draft Program - 2007 Business Conference

Ms. Mobley:
 We spoke earlier re permission for Members to attend the Conference and you asked for

The program, I have not gotten back to you because we have been working on getting the program together. Attached is the draft for your guidance.

Regards and Thanks

Patricia Lewis
Executive Assistant
CARIB NEWS
7 West 36th Street, 8th Floor
New York, NY 10018

1115



THE NEW YORK CARIBNEWS
THE WEEKLY VOICE OF THE CARIBBEAN AMERICAN COMMUNITY
7 WEST 34TH STREET, 8F FLOOR, NEW YORK, NY 10018

TEL: (212) 944-1991; FAX: (212) 944-2089.
E-MAIL ADDRESS: NYCARIB@AOL.COM;
CARIBNEWS@ATT.NET

FASIMILE TRANSMITTAL SHEET

TO: Dawn Kelly Mobley	FROM: Patricia Louis
COMPANY:	DATE: 9/21/07
FAX NUMBER: 202-225-7392	TOTAL NO. OF PAGES INCLUDING COVER:
RE: SPONSOR FORMS	
<input type="checkbox"/> URGENT <input type="checkbox"/> FOR REVIEW <input type="checkbox"/> PLEASE COMMENT <input type="checkbox"/> PLEASE REPLY <input type="checkbox"/> YOUR INFORMATION	

Following is a completed form for your advisement /review/ comments:

Regards

09-4403 0198

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U.S. House of Representatives
Committee on Standards of Official Conduct

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM
(provide directly to each House invitee)

This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers or employees under House Rule XXV, clause 3. A completed copy of the form (and any attachments) should be provided to each invited House Member, officer or employee, who will then forward it to the Committee. The trip sponsor should NOT submit the form directly to the Committee.

Private sponsors are urged to submit this form to each House invitee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the invitee not receiving approval for the trip. The submission of an incomplete form will delay the review process. Before completing this form, sponsors are urged to carefully review the Committee's private travel guidelines and advisory memoranda detailing the rules and restrictions for private travel, as well as the instructions for completing this form. Sponsors should call the Committee with any questions prior to submitting the form. Please type form.

Carr News Foundation

1. Sponsor(s) (who will be paying for the trip): _____
2. I represent that the trip will not be financed (in whole or in part) by a federally-registered lobbyist or a registered foreign agent (signify "yes" by checking box):
3. I represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip (signify "yes" by checking box):
4. Is travel being offered to an accompanying family member of the House invitee(s)? Yes No
5. Provide names and titles of ALL House invitees; for each invitee, provide explanation of why the individual was invited (include additional pages if necessary): _____
each representative spouse is invited or one family member
6. Dates of travel: November 6-11, 2007
7. Cities of departure -- destination -- return: _____
Varies depending on member
8. Attached is a detailed agenda of the activities taking place during the travel (i.e., an hourly description of planned activities) (signify "yes" by checking box):
9. I represent that (check one of the following):
 - a. The sponsor of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965:
 - b. The sponsor of the trip does not retain or employ a federally registered lobbyist or registered foreign agent:
 - c. The trip is for attendance at a one-day event and lobbyist involvement in planning, organizing, requesting, or arranging the trip was *de minimis* under the Committee's travel regulations.
10. If travel is for participation in a one-day event (i.e., if you checked Question 9(c)), check one of the following:
 - a. One night's lodging and meals are being offered:
 - b. Two nights' lodging and meals are being offered:
 If "b" is checked, explain why the second night is warranted: _____

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11. If the trip is not sponsored by an institution of higher education, I represent that a federally-registered lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip (signify "Yes" by checking box)

12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip: Pfizer-Education/Health AT&T and IBM - provide technology to the region, MACY's - seeks new vendor sources, Citibank - opportunities in the region.

13. Describe each sponsor's organizational interest in the purpose of the trip: Regular scheduled air service, economy class.

14. Describe the type and class of the transportation being provided. Indicate whether coach, business-class or first-class transportation will be provided; in addition, for travel via aircraft, please indicate if travel is being offered on a commercial flight, chartered flight or on an aircraft operated or paid for by a carrier not licensed by the Federal Aviation Administration to operate for compensation or hire (i.e., a private aircraft). If first-class fare is being provided, or if travel is via chartered or private aircraft, please provide an explanation describing why such travel is warranted.

15. I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s). (signify "Yes" by checking box)

16. I represent that either (check one of the following):
a. The trip involves an event that is arranged or organized without regard to congressional participation and that meals provided to congressional participants are similar to those provided to or purchased by other event attendees. or
b. The trip involves events that are arranged or organized specifically with regard to congressional participation.
If "b" is checked, detail the cost per day of meals (approximate cost may be provided):

17. Reason for selecting the location of the event or trip: A Caribbean country that has not previously hosted the conference.

18. Name of hotel or other lodging facility: Sundale Resort/Resort

19. Cost per night of hotel or other lodging facility (approximate cost may be provided): \$110.00

20. Reason(s) for selecting hotel or other lodging facility: Has appropriate meeting rooms.

21. TOTAL EXPENSES FOR EACH PARTICIPANT:

Actual amounts Eligible full estimates	Total Transportation Expenses per Participant	Total Lodging Expenses per Participant	Total Meal Expenses per Participant
For each Member, Officer, or employee	320	330	195
For each accompanying family member	320	0	195

	Other Expenses (dollar amount)	Identify Specific Nature of Other Expenses (e.g., taxi, parking, registration fee, etc.)
For each Member, Officer, or employee:		
For each accompanying family member		

22. I represent that reimbursement for miscellaneous travel expenses for the trip, such as travel to and from airports, security costs, interpreter fees, visa application fees, and similar expenses, will be for actual costs incurred and are necessary for the purpose of the trip (signify "yes" by checking box):

23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: _____
 Name and title: _____
 Organization: _____
 Address: _____
 Telephone number: _____
 Fax number: _____
 Email Address: _____

The Committee staff may contact the above individual above if additional information is required.

If there are any questions regarding this form please contact the Committee at the following address:

Committee on Standards of Official Conduct
 U.S. House of Representatives
 RT-2, The Capitol
 Washington, D.C. 20515
 (202) 225-7103 (phone)
 (202) 225-7392 (general fax)
 (202) 226-7172 (fax for travel approvals)

Revised date 4/2007 by Committee on Standards of Official Conduct

U.S. House of Representatives
Committee on Standards of Official Conduct

INSTRUCTIONS FOR FILLING OUT THE PRIVATE SPONSOR TRAVEL
CERTIFICATION FORM

1. *Sponsor(s) (who will be paying for the trip):* Fill in the names of each person, organization, or other entity contributing funds or in-kind support towards the trip.
2. *Represent that the trip will not be financed (in whole or in part) by a federally-registered lobbyist or a registered foreign agent:* House Members and staff may not accept travel funded by a lobbyist or registered foreign agent, even when the lobbyist or foreign agent will be reimbursed by a client or employer.
3. *Represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip:* All financial contributors to the trip must qualify as sponsors and should be listed as a sponsor in response to question 1.
4. *Is travel being offered to an accompanying family member of the House invitee(s)?* Check yes or no. House Rules permit Members and House staff to accept travel benefits for one accompanying family member if offered by the trip sponsor.
5. *Provide names and titles of ALL House invitees; for each invitee, provide explanation of why the individual was invited:* You must list every House Member and employee who is invited on the trip, together with your reason for inviting that individual. Members and House staff may accept privately sponsored travel only when related to the individual's official duties. The explanation should demonstrate a connection between the trip and each invitee's official duties.
6. *Dates of Travel:* State the dates of departure and return.
7. *Cities of departure -- destination -- return:* For example, an appropriate entry might read: "DC - Detroit - DC". Include additional destinations if there will be more than one. Do not list the names of airports, times of flights, or cities where travelers will have an airport layover (this information should be included in the attached detailed agenda).
8. *Attached is a detailed agenda of the activities taking place during the travel:* The agenda should be a detailed, hour-by-hour agenda. Include the names of speakers and the subjects of briefings. The agenda should also include information regarding the time spent on travel to and from the destination, as well as local travel. Travel will not be approved if the agenda includes an excessive amount of either unscheduled time and/or opportunities for recreational activities, even if such activities are at the personal expense of the invitee.

09-4403 0202

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9. *I represent that (check one of the following):* Check only one box in response to this question. "Institutions of higher education" generally includes accredited public and private colleges or trade schools located in the U.S. and its territories; such entities should check box "a" regardless of whether they employ or retain a federal lobbyist or foreign agent. Entities other than institutions of higher education that do not employ or retain a federal lobbyist or foreign agent should check box "b." Entities other than institutions of higher education that do employ or retain a registered lobbyist or foreign agents may sponsor travel only for one-day events. For such trips, lobbyist involvement must be "de minimis" as defined by Committee regulations (see question 12).
10. *If travel is for participation in a one-day event, check one of the following:* Complete this question only if you checked box "b" in response to question 9. For travel to one-day events sponsored by an entity that retains or employs a lobbyist, lodging and meals generally may be provided only for one night. However, two nights may be authorized by the Committee in accordance with the factors set forth in Committee regulations.
11. *If the trip is not sponsored by an institution of higher education, I represent that a federally registered lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip.* House Rules prohibit Members and employees from being accompanied by registered lobbyists or foreign agents while traveling. This rule does not prohibit lobbyist or foreign agent participation in briefings or meetings that occur at the destination.
12. *Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip.* The sponsor(s) (the entity or entities paying for the trip) should be the entity primarily responsible for organizing the trip. Travel may not be accepted from an entity that merely contributes money towards the travel and is not otherwise involved in planning or conducting the trip.
13. *Describe each sponsor's organizational interest in the purpose of the trip.* Briefly describe the interest or purpose of each sponsor in the trip.
14. *Describe the type and class of transportation being provided.* See directions on form.
15. *I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s).* While Members and staff may accept local transportation necessary in facilitating their participation in officially-connected aspects of a trip, Members and staff may not accept local transportation in connection with recreation or entertainment.
16. *I represent that either:* For events that are arranged or organized without regard to congressional participation (e.g., annual meetings of business or trade associations), Members or employees may accept the meals that are provided to all other attendees as part of the event. For events put on specifically for Members or staff, meal expenses must be "reasonable" in accordance with Committee regulations.

17. *Reason for selecting the location of the event or trip:* The destination of a trip must be related to its purpose. Travel to a location of an event organized without regard to congressional participation (for example, annual meetings of business or trade associations) is presumptively reasonable.
18. *Name of hotel or other lodging facility:* Include the names of all hotels and lodging facilities to be used during the trip.
19. *Cost per night of hotel or other lodging facility:* Self-explanatory. Trip sponsors should not pay for a "package" that includes recreational or entertainment activities. However, Members and staff may generally use a pool or gym facilities that are offered free of charge to all hotel guests.
20. *Reason(s) for selecting hotel or other lodging facility:* For events held without regard to congressional participation (e.g., annual meetings of business or trade associations), an entry such as "location of annual trade association meeting" is sufficient. When the trip is held specifically for Members or staff, include rationale such as proximity to the site to be visited or to the airport.
21. *Total Expenses for Each Participant:* Indicate whether the figures provided are actual amounts or good faith estimates by checking the appropriate box. All trip expenses should be included. Expenses other than those for transportation, lodging, and meals must be individually listed and specified.
22. *I represent that reimbursement for miscellaneous travel expenses for the trip, such as travel to and from airports, security costs, interpreter fees, visa application fees, and similar expenses, will be for actual costs incurred and are necessary for the purpose of the trip.* Members and staff may not accept a lump sum based on an estimate of incidental expenses.
23. *Certification Information:* Self-explanatory.

THE TRIP SPONSOR SHOULD PROVIDE A COPY OF THE COMPLETED FORM, INCLUDING ALL ATTACHMENTS, TO EACH HOUSE MEMBER OR EMPLOYEE INVITED ON THE TRIP.

Version date 4/2007 Committee on Standards of Official Conduct

11/02/2006 10:28 FAX

0002/004

U.S. House of Representatives
COMMITTEE ON STANDARDS OF
OFFICIAL CONDUCT
Washington, DC 20515

October 27, 2006

Ms. Michele Rodney
Cable News Foundation
7 West 26th Street, 8th Floor
New York, NY 10018

Dear Ms. Rodney:

This responds to your letter requesting Committee guidance concerning the participation of House Members in the 11th Annual Caribbean Multi-National Business Conference ("Conference") sponsored by the Cable News Foundation ("Foundation"), and other organizations. The conference is scheduled to take place in Panama City, Panama from November 9 to 12, 2006. According to your submission, the Foundation, which is a 501(c)(3) nonprofit organization, will be paying for the Members' travel expenses including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a "contribution to the overall pool of expenses in contribution to the Foundation," which is used to "underwrite the overall expenses of the Conference," primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organizations who will be attending and participating in the Conference.

The Committee on Standards of Official Conduct strongly encourages outside organizations considering whether to offer travel expenses to House Members and staff to contact our office for information about the rules governing the acceptance of such an offer. It is important to bear in mind, however, that the Committee is authorized by the Rules of the U.S. House of Representatives to render advisory opinions to Members, officers, and employees regarding the propriety of current or proposed conduct. We do not render such opinions to private organizations. Particularly in the case of travel, it is the Member, officer, or employee who is at risk in the case of a violation of the rules. Given the different circumstances in which individual Members and employees find themselves, it would be inappropriate for an outside organization to suggest that a trip had been "pre-cleared" by the Committee. However, we are able to provide you with some general information.

¹ According to your submission, the additional trip sponsors include Macy's, Jet, Qantas, Pfizer, AT&T, Golden River Products, American Airlines, Citibank, IBM, Panama City, and the Republic of Panama.

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Ms. Michele Rodney
October 27, 2006
Page 2

House Rule 25, clause 5 (the gift rule) permits a Member or employee of the House to accept from a private source (other than a registered lobbyist or agent of a foreign principal) the necessary travel expenses to attend a meeting, speaking engagement, fact-finding trip, or similar event in connection with official duties if the private source is directly and immediately associated with the event or location being visited. "Necessary" expenses include reasonable expenses for transportation, lodging, food, and refreshments, but they do not include expenditures for entertainment or recreational activities.

Generally, any gifts that may be offered during the trip, including any gifts of entertainment or recreational activity, must be valued at a total of less than \$50 for the trip, with the annual gift limit of less than \$100 from a single source. On any trip, the aggregate value of any such gifts that may be accepted from any source is less than \$50.

In the case of international travel, necessary expenses may be accepted for not more than seven days, excluding travel. House Members may also accept expenses to enable one family member to accompany them on the trip, if offered by the trip sponsor. In addition, each Member who participates in the trip must complete a Travel Disclosure and file this form with the Clerk of the House within 30 days after their return. See House Rule 25, cl. 5(d)(1)(A)(i), (b)(3). Members are also required to report all travel expenses totaling more than \$305 from a single source on Schedule VII of their annual Financial Disclosure Statement under the Ethics in Government Act and House Rule 26. On both forms, Members should indicate to the "trip sponsor" all of the organizations that provided financial underwriting for the trip.

Because the trip will involve meetings with foreign government representatives and the trip sponsors include the Republic of Panama and Panama City, it is important to note that government officials, including Members and employees of Congress, are prohibited by Article I, section 9, clause 8, of the United States Constitution from receiving "any present... of any kind whatever" from a foreign state or a representative of a foreign government without the consent of the Congress. In the Foreign Gifts and Decorations Act (5 U.S.C. § 7342) (FGDA), Congress has consented in advance to acceptance of gifts of travel or expenses for travel taking place entirely outside of the United States offered by a foreign government. Gifts of travel or expenses for travel include food, lodging, transportation, and entertainment related to the official duties of a Member, officer, or employee. Congress has also consented to the acceptance of gifts "of minimal value (unless as a souvenir or mark of courtesy)." 5 U.S.C. § 7342(c)(1)(A). Under this provision and implementing regulations issued by this Committee, the term "minimal value" is defined as \$305. The FGDA also permits Members and staff to accept a gift worth more than minimal value when refusal would cause offense or embarrassment with gifts are the property of the United States and must be deposited with the Clerk of the House. Any tangible gifts valued in excess of minimal value or travel expenses of any value received from a foreign government pursuant to FGDA must be disclosed on a Form for Disclosing Gifts from Foreign Governments, in addition to the

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Ms. Michele Rodney
October 27, 2008
Page 3.

travel disclosure form described above. Copies of both forms are available on the Committee's Website.

Any House Member invited to travel at private expense should be encouraged to contact this Committee's Office of Advice and Education at (202) 225-7103 if they have any questions on the applicable rules. Please provide a copy of this letter to each invited Member.

If you have any further questions, please contact the Committee's Office of Advice and Education at extension 5-7103.

Sincerely,

Dem. Handberg
Dem Handberg
Chairman

Howard L. Berman
Howard L. Berman
Ranking Minority Member

DE/HLB:ala

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0000/0000

03/20/2009 03:43 FAX



Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10018
Tel: (212) 944-1991; Fax: (212) 944-2089
E-mail: info@caribnewsconference.com

October 10, 2006

The Honorable Doc Hastings
Chair
Standards of Official Conduct
Rm. HT-2, The Capitol
Washington, DC 20515

Via Fax: 202-226-7392 & US Mail

Dear Committee Chair Hastings:

As you might be aware, The Carib News Foundation, created to provide a forum for businesses from the United States to dialogue and establish business partnerships with communities in other parts of the world, has invited Members of Congress to participate in the 11th anniversary of the Caribbean Business Conference.

This year the conference will be held in Panama City, Panama from November 9 – 12, 2006. In cooperation with the Government of Panama, our goal is to have all interested parties joining forces to foster an atmosphere of democracy, stability and opportunity for our fellow citizens of the world. It will also allow businesses in the United States to introduce their products to a new market, thus adding to the economy of both countries.

It is important for Members of Congress to attend in order to get insights into the global economy and how current law and proposed legislation can add in assisting their constituents to move towards a global exchange.

To this effort, The Carib News Foundation and its Board of Directors, respectfully request approval for the Members to attend. If there are any questions or concerns, you may contact me at 212-944-1991. I look forward to making this event as successful in its 11th year as it has been in the past 10 conferences.

Sincerely,

Michelo Rodney
President
Carib News Foundation

cc: Congresswoman Stephanie Tubbs-Jones

Organized by Carib News Foundation. A non-profit project 501-C-3 corporation

09-4403 0208

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Registration

From: plouls [plouls@nycaribnews.com]
Sent: Friday, September 21, 2007 1:56 PM
To: 'Dawn.KellyMobley@mail.house.gov'
Subject: Re Sponsorship information

The official sponsor of the conference is the CARIB NEWS FOUNDATION, a not-for-profit 501(c)(3) Organization that provides educational information about the Caribbean Region and its relationship with the US in doing business and developing good neighborly ties with the United States, security, health, education etc.

The CARIB NEWS FOUNDATION does not retain or employ a registered lobbyist or registered foreign agent.

Please use me as your contact for the purposes of this Conference.

The form will be emailed to you this afternoon.

Regards
Patricia Louis

Executive Assistant
CARIB NEWS
7 West 36th Street, 8th Floor
New York, NY 10018

9/21/2007

09-4403 0209

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CN-000087

Re: Sponsorship information

Page 1 of 1

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Wednesday, September 19, 2007 8:32 PM
To: plouls@nycarlbnews.com
Subject: Re: Sponsorship Information

My condolences. No, we did not know of their loss. Is Mr. Rodney our actual contact in this matter? If so when appropriate, please impress upon him that the rules have changed dramatically and there are certain gifts and travel that can no longer be permitted so we need to clear this as early as possible. Moreover as he probably remembers, all Members have to seek approval for their individual travel...forms must be prepared, submitted, and approved for each Member's travel. Therefore, please remember to provide each of your invitees with the requisite paperwork. Hopefully by preparing early, we can circumvent the majority of problems you faced in securing their congressional travel last year. Have a good evening and please share my condolences with the Rodneys. Dawn

Sent using BlackBerry

-----Original Message-----
From: plouls <plouls@nycarlbnews.com>
To: Kelly Mobley, Dawn
Sent: Wed Sep 19 18:23:58 2007
Subject: Sponsorship Information

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CONFIDENTIAL

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Wednesday, September 19, 2007 3:23 PM
To: plouis
Subject: RE: Draft Program - 2007 Business Conference (No agenda or program attached)

Lastly, just send the sponsor form asap for review. The new rules might prohibit some things you were able to do with so many different sponsors in the past, but until we get the form, we can't make the most informed decision. I have let the Congresswoman know we are awaiting your sponsor form. Just as you do, they would also like assurance. Thank you.

From: Kelly Mobley, Dawn
Sent: Wednesday, September 19, 2007 3:09 PM
To: 'plouis'
Subject: RE: Draft Program - 2007 Business Conference (No agenda or program attached)

I am mailing (US Postal) a copy of the official Gifts and Travel Guide. Some pages are omitted so call with any questions not addressed in the bound pages. I am using the address you provide in your emails.

From: Kelly Mobley, Dawn
Sent: Wednesday, September 19, 2007 2:16 PM
To: 'plouis'
Subject: RE: Draft Program - 2007 Business Conference (No agenda or program attached)

Patrola:

I understand that several organizations will take part in sponsoring food and other parts of the Antigua travel. However, I need clarification on the *official* sponsor; that organization providing travel, lodging, and organizing the trip? Am I to assume it is CARIB NEWS? The official sponsoring organization must not retain or employ a registered lobbyist or registered foreign agent (and the sponsor must have a direct and immediate relationship with the event or location being visited). To assist with this, I am scanning information/guidelines and emailing in just a moment. Please provide a fax number if that method of submittal will be more helpful. If there is someone handling this matter, please provide me their direct contact information as I must ensure adherence to these new guidelines pre-travel.

In any event, I do need to know who the official sponsor will be. I have assigned a staff attorney to review your documents and will remain in contact with you until this matter is finalized.

Please respond today or tomorrow at the latest. I will be travelling for a while thereafter and must ensure that my staff attorney has all that is necessary for a safe review.

Dawn Kelly Mobley
 Ethics Counsel for Congresswoman Stephanie Tubbs Jones
 Chairwoman, Committee on Standards of Official Conduct
 U.S. of Representatives
 Washington, DC 20515
 202/228-7103

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Tuesday, September 18, 2007 7:03 PM
To: plouis@myparibnews.com
Subject: Re: Draft Program - 2007 Business Conference (No agenda or program attached)

~~Remove these organizations from my distribution list~~

Sent using BlackBerry

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We had received the forms from Shelley.
 The sponsors to date are : MACYS, PFIZER, AMERICAN AIRLINES, GOLDEN KRUST
 BAKERY, CARIBBEAN FOOD DELIGHTS, PREFERRED HEALTH PARTNERS, IBM,
 AT&T/CINGULAR

Regards

Patricia Louis
 Executive Assistant
 CARIB NEWS
 7 West 36th Street, 8th Floor
 New York, NY 10018

-----Original Message-----

From: Kelly Mobley, Dawn [mailto:Dawn.KellyMobley@mail.house.gov]
 Sent: Tuesday, September 18, 2007 12:57 PM
 To: plouis
 Subject: RE: Draft Program - 2007Business Conference (No agenda or program attached)

When you send the draft agenda, please also forward any information on your sponsor's status.
 If/He cannot be a lobbyist. Do you need a copy of the new travel rules?

From: Kelly Mobley, Dawn
 Sent: Monday, September 17, 2007 5:53 PM
 To: 'plouis'
 Subject: RE: Draft Program - 2007Business Conference

Nothing was attached to this email. Therefore, we have not received the proposed agenda you
 mention below and have nothing to preview.

From: plouis [mailto:plouis@nycaribnews.com]
 Sent: Monday, September 17, 2007 3:47 PM
 To: Kelly Mobley, Dawn
 Subject: Draft Program - 2007Business Conference

Ms. Mobley:
 We spoke earlier re permission for Members to attend the Conference and you asked for
 the program. I have not gotten back to you because we have been working on getting
 the program together.
 Attached is the draft for your guidance

Regards and Thanks

Patricia Louis
 Executive Assistant
 CARIB NEWS
 7 West 36th Street, 8th Floor
 New York, NY 10018

9/20/2007

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Exhibit 18

U.S. House of Representatives
Committee on Standards of Official Conduct

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM
(provide directly to each House invitee)

This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers or employees under House Rule XXV, clause 5. A completed copy of the form (and any attachments) should be provided to each invited House Member, officer or employee, who will then forward it to the Committee. The trip sponsor should NOT submit this form directly to the Committee.

Private sponsors are urged to submit this form to each House invitee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the invitee not receiving approval for the trip. The submission of an incomplete form will delay the review process. Before completing this form, sponsors are urged to carefully review the Committee's private travel guidelines and advisory memoranda detailing the rules and restrictions for private travel, as well as the instructions for completing this form. Sponsors should call the Committee with any questions prior to submitting the form. Please type form.

- CARIB NEWS FOUNDATION
1. Sponsor(s) (who will be paying for the trip): _____
 2. I represent that the trip will not be financed (in whole or in part) by a federally-registered lobbyist or a registered foreign agent (signify "yes" by checking box):
 3. I represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip (signify "yes" by checking box):
 4. Is travel being offered to an accompanying family member of the House invitee(s)? Yes No
 5. Provide names and titles of ALL House invitees; for each invitee, provide explanation of why the individual was invited (include additional pages if necessary): EACH REPRESENTATIVE'S SPOUSE
 6. Dates of travel: NOVEMBER 8 - 11, 2007
 7. Cities of departure -- destination -- return: VARIES DEPENDING ON MEMBER
 8. Attached is a detailed agenda of the activities taking place during the travel (i.e., an hourly description of planned activities) (signify "yes" by checking box):
 9. I represent that (check one of the following):
 - a. The sponsor of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965: or
 - b. The sponsor of the trip does not retain or employ a federally registered lobbyist or registered foreign agent: or
 - c. The trip is for attendance at a one-day event and lobbyist involvement in planning, organizing, requesting, or arranging the trip was *de minimis* under the Committee's travel regulations.
 10. If travel is for participation in a one-day event (i.e., if you checked Question 9(c)), check one of the following:
 - a. One-night's lodging and meals are being offered: or
 - b. Two-nights' lodging and meals are being offered:
 If "b" is checked, explain why the second night is warranted: _____

11. If the trip is not sponsored by an institution of higher education, I represent that a federally-registered lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip (signify "yes" by checking box):
12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip: _____
 CARIB NEWS FOUNDATION (SEE ATTACHED SHEET)
13. Describe each sponsor's organizational interest in the purpose of the trip: _____
 THE INTEREST OF CARIB NEWS FOUNDATION IS TO PROMOTE, INFORMATION, TRADE AND
 MEANINGFUL CONNECTION BETWEEN THE UNITED STATES AND THE CARIBBEAN
14. Describe the type and class of the transportation being provided. Indicate whether coach, business-class or first-class transportation will be provided. In addition, for travel via aircraft, please indicate if travel is being offered on a commercial flight, chartered flight or on an aircraft operated or paid for by a carrier not licensed by the Federal Aviation Administration to operate for compensation or hire (i.e., a private aircraft). If first-class fare is being provided, or if travel is via chartered or private aircraft, please provide an explanation describing why such travel is warranted: _____
 REGULAR SCHEDULED AIR SERVICE, ECONOMY CLASS
15. I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s). (signify "yes" by checking box):
16. I represent that either (check one of the following):
 a. The trip involves an event that is arranged or organized without regard to congressional participation and that meals provided to congressional participants are similar to those provided to or purchased by other event attendees: or
 b. The trip involves events that are arranged or organized specifically with regard to congressional participation:
 If "b" is checked, detail the cost per day of meals (approximate cost may be provided): _____
17. Reason for selecting the location of the event or trip: A CARIBBEAN COUNTRY THAT HAS NOT
 PREVIOUSLY HOSTED THE CONFERENCE
18. Name of hotel or other lodging facility: SANDALS RESORT/REX RESORT
19. Cost per night of hotel or other lodging facility (approximate cost may be provided): \$1,000
20. Reason(s) for selecting hotel or other lodging facility: HAS APPROPRIATE MEETING ROOMS

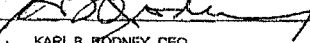
21. TOTAL EXPENSES FOR EACH PARTICIPANT:

<input type="checkbox"/> actual amounts <input checked="" type="checkbox"/> good faith estimates	Total Transportation Expenses per Participant	Total Lodging Expenses per Participant	Total Meal Expenses per Participant
For each Member, Officer, or employee	320	330	115
For each accompanying family member	320	0	115

	Other Expenses (dollar amount)	Identify Specific Nature of "Other" Expenses (e.g., taxi, parking, registration fee, etc.)
For each Member, Officer, or employee		
For each accompanying family member		

22. I represent that reimbursement for miscellaneous travel expenses for the trip, such as travel to and from airports, security costs, interpreter fees, visa application fees, and similar expenses, will be for actual costs incurred and are necessary for the purpose of the trip (signify "yes" by checking box):

23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: 
 Name and title: KARL B. RODNEY, CEO
 Organization: CARIB NEWS FOUNDATION
 Address: 7 WEST 36TH STREET, 8TH FLOOR NEW YORK, NY 10018
 Telephone number: 212-944-1991
 Fax number: 212-944-2089
 Email Address: CARIB-DESK@ATT.NET

The Committee staff may contact the above individual above if additional information is required.

If there are any questions regarding this form please contact the Committee at the following address:

Committee on Standards of Official Conduct
 U.S. House of Representatives
 HT-2, The Capitol
 Washington, DC 20515
 (202) 225-7103 (phone)
 (202) 225-7392 (general fax)
 (202) 226-7172 (fax for travel approvals)

Version date 4/2007 by Committee on Standards of Official Conduct

2007 MULTINATIONAL BUSINESS CONFERENCE				
NOVEMBER 8 -11, 2007				
INVITED MEMBERS OF CONGRESS				
Sanford Bishop				
G. K. Butterfield				
Donna M. Christensen				
William Lacy Clay				
Sheila Jackson Lee				
Eddie Bernice Johnson				
Kendrick Meek				
Donald Payne				
Charles Rangel				
Bennie Thompson				
Stephanie Tubbs-Jones				
Carolyn Kilpatrick				
Barbara Lee				
Gregory Meeks				
Edolphus Towns				
Yvette Clarke				
Maxine Waters				
James Clyburn				
David Scott				
Laura Richardson				
Eleanor Holmes-Norton				
Elijah Cummings				
Diane Watson				
Keith Ellison				
Henry Johnson				
Melvin Watt				
Albert Wynn				
John Lewis				

2007 MULTINATIONAL BUSINESS CONFERENCE			
NOVEMBER 8-11, 2007			
INVITED MEMBERS OF CONGRESS			
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Carolyn Kilpatrick			
Barbara Lee			
Gregory Meeks			
Edolphus Towns			
Yvette Clarke			
Marcine Waters			
James Clyburn			
David Scott			
Laura Richardson			
Eleanor Holmes-Norton			
Elijah Cummings			
Diane Watson			
Kelth Blanton			
Henry Johnson			
Melvin Watt			
Albert Wynn			
John Lewis			
Britt Wainstock			
George Dalley			



Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10017
Tel: (212) 944-1999 Fax: (212) 944-2089
E-mail: info@caribnewsconference.com

Item #12

CARIB NEWS FOUNDATION is organized to provide education and information about the Caribbean in the area of Business, Education, Health and Culture, Promote Good neighborly within the United States and the hemisphere.

The participants are selected to participate in the various workshops during the Conference based on their demonstrated interest, expertise and assignment in the United States Congress.

Organized by Carib News Foundation. A non-profit project 501-C3 corporation

Exhibit 19



WORKING DRAFT

12th Annual Caribbean Multi-National Business Conference Program
Antigua & Barbuda

Thursday November 2007

12:00noon - 6:00pm : CONFERENCE REGISTRATION

COMMUNITY OUTREACH PROGRAM

WTO - RULES BASED TRADE & POVERTY REDUCTION

Hon. Charles Rangel - Member of Congress

Hon. Maurice Waters - Member of Congress

Hon. Dr. Errol Cort - Minister of Finance & The Economy

Moderator - Wallace Ford

Facilitator - MEC Interns

Sponsor - ED

6:30- 7:30pm - OPENING RECEPTION

Venue - Sandals Grand

Theme - CEMENTING DIASPORA TIES

Sponsor - Antigua Government



Sabrina Heang
 FIVE A. ROONEY - President CARIB NEWS
 HON. NICK HARRIS - Member of Congress
 Hon. Harold Lowell - Minister of Tourism & Aviation
 Samiela Grande
 COLLABORATIVE STRATEGIES
 SANDALS
 Hon. Nick Harris, New York State Assemblyman
 Hon. Batek Stewart, Chairman, Sandals
 Hon. Ed Towns - Member of Congress
 Hon. Harold Lowell - Minister of Tourism & Aviation
 Hospitality Area
 Sandals Cruise
 Royal Caribbean Bakery
 Friday, November 9, 2007
 8:00am - 8:45am BREAKFAST - Buffet Style
 9:00am - 6:00pm CONFERENCE REGISTRATION
 9:00am - 10:15am OPENING CEREMONIES
 Venue: Sandals Grande - Main Ballroom

09-4403 0222





THEME: **CEMENTING DIASPORA TIES, COLLABORATIVE STRATEGIES**

SPONSOR: CHINESE AMERICAN STATES

INVESTITOR:

ADDRESS:

SPEAKERS: Eric Eya

Karen Boylsh-Towne

Ed Goldberg

Mavis Long

Hazel Duker - NAACP

SPONSOR: Hon. Donna Christensen - Minister of Finance & The Economy

Hon. Carolyn Cheeks Kilpatrick - Member of Congress

Ambassador Andrew Young

Hon. Lonise Lake Tack - Governor General of Antigua

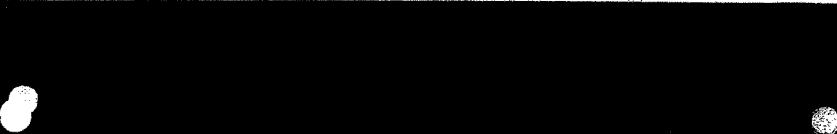
OR

Prime Minister Hon. Baldwin Spencer

Ribbon Cutting

10:50am - 11:55am - PRESENTATION

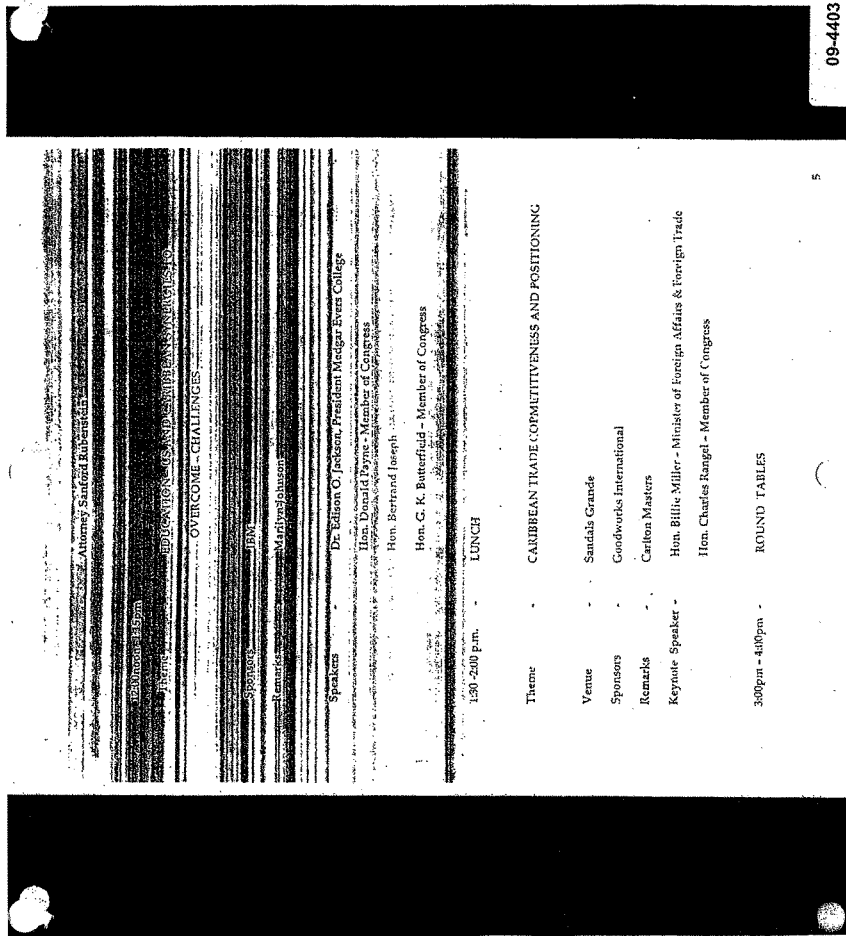
THEME: DEVELOPMENT BANKS, PRIVATE DEBT AND EQUITY





Venue: Sandals Grande
 Sponsors: CITI
 (Hon. William Lacy Clay - Member of Congress)
 Speaker: Hon. William Lacy Clay - Member of Congress
 Hon. Compton Anthony - President, ACDP
 Caribbean Minister of Finance, STPD
 12:00noon - 1:15pm
 Theme: NATIONAL SECURITY: A PRE-CONDITION FOR SUCCESS
 Venue: Sandals Grande
 Sponsors: HSBC
 Moderator: Dr. Basil Wilson
 Remarks: Reginald Canal
 Keynote Speaker: Hon. Bennie Thompson - Member of Congress
 Panelists:
 Hon. William Lacy Clay Jr. - Member of Congress
 Hon. Dianne Christensen - Member of Congress
 Hon. Yvette Clarke - Member of Congress
 Hon. Colin V. A. Derrick - Minister of Justice





Attorney Sanford Rubenstein

EDUCATION, US AND CARIBBEAN STUDIES TO
OVERCOME CHALLENGES

1:30-2:00 pm LUNCHE

Speakers
 Dr. Edilson O. Jackson, President Medgar Evers College
 Hon. Donald D. Matthews, Member of Congress
 Hon. Bernard Joseph, Member of Congress
 Hon. C. K. Butterfield - Member of Congress

Theme CARIBBEAN TRADE COMPETITIVENESS AND POSITIONING

Venue Sandals Grande

Sponsors Goodworks International
 Carlton Masters

Remarks Hon. Billie Miller - Minister of Foreign Affairs & Foreign Trade
 Hon. Charles Rangai - Member of Congress

3:00pm - 4:30pm ROUND TABLES



09-4403 0226

IMMIGRATION
 Moderator : [Illegible]
 Hon. Yvette Clarke - Member of Congress
 Hon. Kendrick Meek - Member of Congress
 Hon. Yvonne Graham
 Perferred Health Partners

PORT & AIRPORT SECURITY - TILMANTAIPE
 Moderator : Laneé Ogiste
 Hon. Bennie Thompson

DIVERSITY IN GROWTH & DEVELOPMENT
 Moderator : [Illegible]
 Ed Goldberg
 Cheryl Menno
 State Senator Kevin Parker
 City Council member [Illegible]

MACYS
 Ed Goldberg
 Cheryl Menno
 State Senator Kevin Parker
 City Council member [Illegible]

SPONSOR
 MACYS





Dr. Chael Wilson
 Sponsor - Preferred Health Values
 Hon. Barbara Lee - Member of Congress
 Hon. Bill Engvall - Member of Congress
 Hon. Gregorio Meeks - Member of Congress
 CARCOM REP. - IUD
 Venue: Goodworks International
 Speaker: Hon. Gregorio Meeks - Member of Congress
 CARCOM REP. - IUD
 6:00pm - 6:30pm
 Venue: Off Site
 Theme: HEALTH - COMMON BELIEFS - PROVEN SOLUTIONS
 Sponsor: Pfizer
 Remarks: Karen Boykin-Towns
 Moderator: Dr. Marcia Bayne Smith





09-4403 0229

Remarks - Brenda Scott - Macy's
 MC
 Mandy Johnson
 Speaker - Albert Obama (USA)
 Hon. Edna Bernier Johnson - Member of Congress
 Hon. Diane Abbott - Member of Parliament, UK
 Baroness Patricia Scotland - Scottish Secretary for Health (UK)
 Hon. David Cameron - Prime Minister, UK
 Governor General of Panama
 Presentation
 10:50am - 11:30pm
 HEALTH - REAL INVESTMENT OPPORTUNITIES IN UPGRADE
 CARE AND DELIVERY
 Venue - Spadina Grand
 Sponsors - Pfizer
 Co-sponsors - Karen Boykin-Towns - Pfizer
 Chair/Moderator - Hon. Yvonne Graham
 Keynote - Dr. Dennis Douglas - Prime Minister St. Kitts/Nevis
 Panelists - Dr. Dexter McKenzie
 Hon. Donna Christensen - Member of Congress
 Dr. Lesly Kermant
 Dr. Marcia Bayne-Smith



Caribbean person - TBD

THE CARIBBEAN COMMISSION - THE CARIBBEAN CATALYST

Venue: AMERICAN AIRLINES/STANDAYS

Sponsors: AMERICAN AIRLINES/STANDAYS

Chair/Moderator: 1978-1980

Speakers: Hon. Gregory Meeks - Member of Congress
 Hon. Keith Ellison - Member of Congress
 Hon. Allan Chazanov - Minister of Tourism, St. Lucia
 Hon. Harold Lovell, Minister of Tourism, Antigua & Barbuda

10:15 am - 11:45 am PRESENTATION

Theme: TECHNOLOGY & COMMUNICATION - SHARING

Venue: Sandals Grande

Sponsors: AT&T

Remarks: Marc Long

Keynote Speakers: Hon. Ed Towns - Member of Congress
 Hon. Eddie Bernice Johnson - Member of Congress
 Dr. Edmond Masoom - Member of State

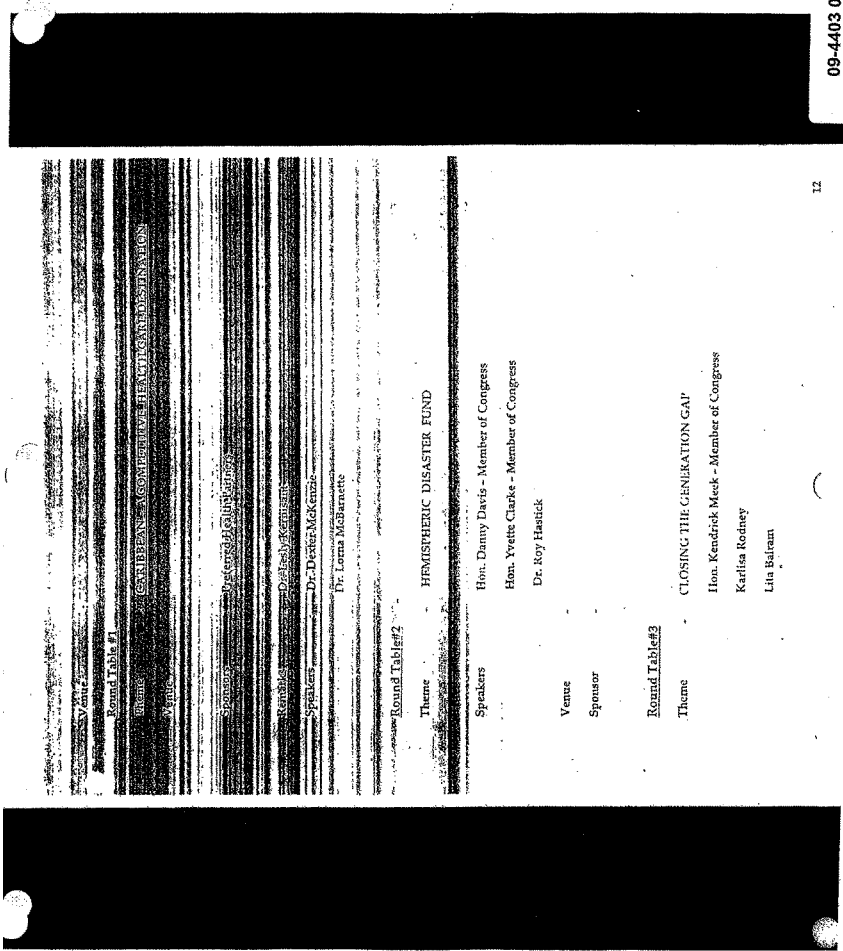
12:00 noon - 1:15 pm





PARTICIPATING THE DISTRICT IN BUSINESS INVESTORS
 MANAGEMENTORS/STAINERS
 South Grand
 Sponsor - HSHC
 Remarks -
 Speaker - Hon. William Lacy Clay Jr.
 Hon. Carolyn Cheeks Kilpatrick - Member of Congress
 Hon. Kendrick Meek - Member of Congress
 Hon. William Lacy Clay Jr. - Member of Congress
 LUNCH
 AND ROLE
 Sponsors - Citi
 Remarks - Michael Finnigan
 Speakers - Eric Ewe - Citi
 Hon. William Thompson, New York City Comptroller
 2:30pm - 6:30pm
 Optional
 3:00pm - 4:00pm - ROUND TABLE





Round Table #1
 STAFFORD-RIEHLER COMPREHENSIVE HENRIC DISASTER FUND
 Dr. Donna McBarone
 Dr. Lorna McBarone

HERMISHERIC DISASTER FUND

Speakers
 Hon. Danny Davis - Member of Congress
 Hon. Yvette Clarke - Member of Congress
 Dr. Roy Hamrick

Venue
 Sponsor

Round Table#2

Theme
 CLOSING THE GENERATION GAP
 Hon. Kendrick Meek - Member of Congress
 Kadisa Rodney
 Lita Balraan

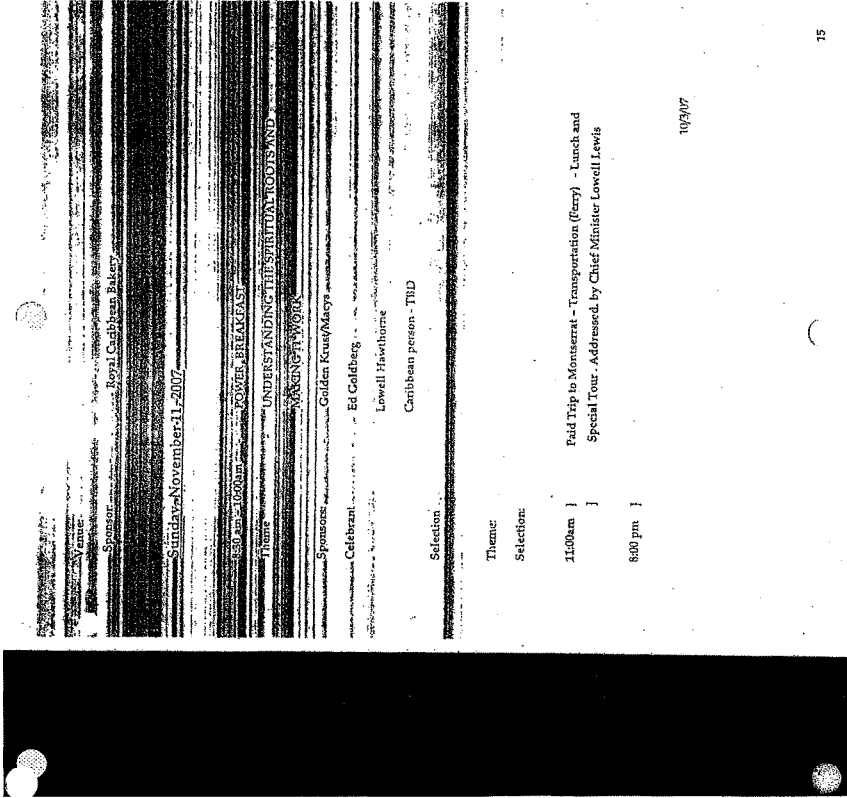


... Facilitator : MEC Intern.
 ... ED
 ... 6:30 - 7:30pm ... GALA RECEPTIONS
 ... Venue
 ... Speaker : Hon. Billie Miller, Minister of Foreign Affairs,
 Minister of Government - Antigua
 Theme :
 ... 7:30 - 10:00 pm : GALA - DINNER & AWARDS
 Venue
 Sponsors : CITI/MACY/FREZER
 Speakers : Hon. Charles Rangel - Member of Congress
 Hon. James Clyburn - Member of Congress
 Keynote Speaker : Prime Minister Hon. Baldwin Spencer
 Presentation of the Marcus Garvey "Bridge Builder" Awards
 Hospitality Area
 10:30pm - 1:00am

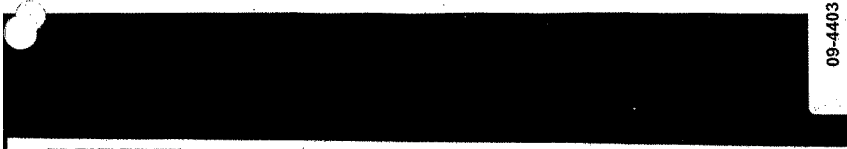




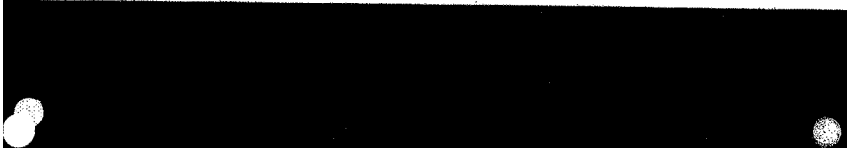
09-4403 0235



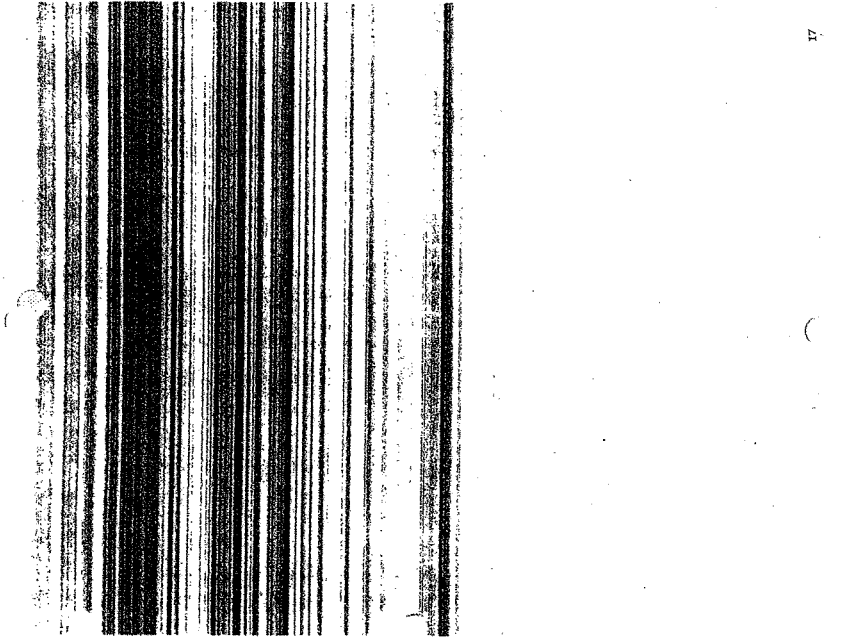
Sunday November 11, 2007
 8:00 am - 10:00 am - POWER BREAKFAST
 UNDERSTANDING THE SPIRITUAL ROOTS AND
 MASONRY
 Sponsors: Golden Krum/Masya
 Celebrant: Ed Goldberg
 Lowell Hawthorne
 Caribbean person - TBD
 Selection
 Theme
 Selections
 11:00am } Paid Trip to Montserrat - Transportation (ferry) - Lunch and
 } Special Tour. Addressed by Chief Minister Lowell Lewis
 8:00 pm }
 10/3/07



OFFICE PUBLIC SCHEDULE MANDATORY MEMBERS OF CONGRESS
 Friday, November 9, 2007
 5:30 - 6:30 p.m. - Private Welcome Reception with Governor Central
 Saturday, November 10, 2007
 US CARIBBEAN RELATIONS
 11:00 a.m. - 1:00pm - Closed Door Meeting
 (Mandatory for all Members)
 Prime Ministers & Ministers of Government
 with Members of Congress
 Secretary of State - Condoleezza Rice (Invited)
 5:30pm - 6:30pm - Private Meeting with Local Elected Officials and
 the Business Community



09-4403 0237



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Exhibit 20

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended.

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re: Representative 1 from Macy's
Review #: 09-6333; 09-2567; 09-4403; 09-3698; 09-2222
Date: May 27, 2009
Location: 11 Penn Plaza
New York, NY 10001
Time: 11:10pm to 12:00 p.m. (approximately)
Participants: Leo Wise
Omar Ashmawy

Summary: Representative 1 from Macy's is the Senior Vice President of Government and Consumer Affairs and Diversity Vendor Development at Macy's, Inc. He was interviewed pursuant to Review 09-2567; 09-4403; 09-3698; 09-6333; and 09-2222. We requested an interview with Representative 1 from Macy's and he consented to an interview. Representative 1 from Macy's made the following statements in response to our questioning:

1. Representative 1 from Macy's was given an 18 U.S.C. § 1001 warning and consented to an interview. Representative 1 from Macy's signed a written acknowledgement of the warning. [attached]
2. Representative 1 from Macy's met Karl and Faye Rodney in 1996. As a result of the large Caribbean Community in New York City and Macy's commercial interests in the Caribbean region, Representative 1 from Macy's asked Macy's advertizing division to consider the CaribNews newspaper.
3. The first conference he attended was in 1998 in St. Lucia. He attended as a participant. At the time, Macy's was considering a store in Puerto Rico and so Representative 1 from Macy's was especially interested in business in the region. He was impressed by how many government officials from the Caribbean region were present at the conference and by what they had to say about developing relationships with the United States.

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

4. In the ensuing years, Macy's became a sponsor. The conference was a place where the company looked for vendors and designers. It was also a place where they could hear from U.S. legislators about their thoughts on the region. It was also a place for Representative 1 from Macy's to connect with U.S. companies who were attending.
5. Macy's first sponsored the conference in 2000. Over the years they have sponsored the event on an annual basis at varying levels, ranging from \$10,000 to \$35,000. As women's issues are particularly important to Macy's, given their clientele, their sponsorship focuses on the conference's "Women's Power Breakfast." The event was described as very lavish. All attendee of the breakfast also get a Macy's tote bag.
6. In 2008, Macy's contribution to the conference was \$35,000 is cash and an in-kind contribution of 400 tote bags. The total value of the in-kind contribution was \$4,620. The money was earmarked specifically for the conference.
7. As a sponsor, Macy's was given the opportunity to have a representative make opening remarks, to have representation at the Women's Power Breakfast, have input into who the speaker at the breakfast will be, and attend the closed door session with Members of Congress and officials from the Caribbean governments. Representative 1 from Macy's did in fact attend the closed door session in 2008. He recalled that other corporate sponsors also attended the meeting, but he could not recall which ones.
8. Representative 1 from Macy's recalled interacting with Representative Payne, Representative Kilpatrick, Representative Thompson, Representative Rangel, and Delegate Christensen. His interactions were all social in nature.
9. Representative 1 from Macy's was not aware of any other events sponsored by or planned by the CaribNews Foundation. With the exception of the conference, he was not aware of any other instances when Macy's supported a CaribNews Foundation event. Given Representative 1 from Macy's position within the company, it is very likely he would know if Macy's had done so.


I prepared this Memorandum of Interview on May 28, 2009 after interviewing Representative 1 from Macy's on May 27, 2009. I certify that this memorandum contains all pertinent matter discussed with Representative 1 from Macy's on May 27, 2009.

Omar Ashmawy
Investigative Counsel

OFFICE OF CONGRESSIONAL ETHICS
U.S. HOUSE OF REPRESENTATIVES

18 U.S.C. § 1001 ACKNOWLEDGEMENT

I have been provided with a copy of the text of section 1001 of title 18, United States Code (popularly known as the false Statements Act) and hereby acknowledge that it applies to any testimony or documents I provide to the Office of Congressional Ethics.

Name:  _____

Signature:  _____

Date: 5/29/08 _____

For Office Use:

Review(s) No. _____

Exhibit 21

*Updated Schedule
for Carib News*
PAGE 09

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WORKING DRAFT 10/22

**12th Annual Caribbean Multi-National
Business Conference Program
Antigua & Barbuda**

Thursday, November 8, 2007

12:00noon- 6:00pm :	CONFERENCE REGISTRATION -
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8:00 - 6:30am	-	COMMUNITY OUTREACH PROGRAM
Venue	-	Multi-Purpose Cultural Centre - Ferry Bay, St. John's
Theme	-	WTO - RULES BASED TRADE & POVERTY REDUCTION
Speakers	-	Hon. Charles Rangel - Member of Congress Hon. Maxine Waters - Member of Congress Hon. Dr. Brrol Cort - Minister of Finance & The Economy
Moderator	-	Tony Best
6:30- 7:30pm	-	OPENING RECEPTION
Venue:	-	Sandals Grande - Main Ballroom
Theme:	-	CEMENTING DIASPORA TIES
MC:	-	Judge Sylvia Hinds-Radix
Speakers	-	Raye A. Rodney - President CARIB NHA 09 Hon. Yvette Clarke - Member of Congress
7:30 - 9:30 pm	-	
Theme:	-	COLLABORATIVE STRATEGIES

09-4403 0243

Venue: - Sandals Grande - Main Ballroom
 Moderator - Hon. Nick Perry, New York State Assemblyman
 Speakers - Hon. 'Butch' Stewart, Chairman, Sandals
 Hon. Ed Towns - Member of Congress
 Hon. Harold Lovell - Minister of Tourism & Aviation

10:00pm - 1:00am - Hospitality Area
 Venue: Sandals Grande - Reflective Pool

Friday, November 9, 2007

8:00am - 8:45am BREAKFAST - Buffet Style

9:00am - 9:00pm CONFERENCE REGISTRATION

9:00am - 10:15am - OPENING CEREMONIES

Venue: - Sandals Grande - Main Ballroom
 Theme: - CELEBRATING DIASPORA TIES, COLLABORATIVE STRATEGIES

Remarks: - Eric Ebe
 Dr. Lowell Lewis, Chief Minister
 Monserrat
 Karen Boychin-Towns
 Ed Goldberg
 Marc Long
 Hazel Dukes - NAACP
 William Thompson, NYC Comptroller
 Commissioner Sarah Wesco-Williams, Leader of Govt. St. Maarten
 Greetings

Speakers: Hon. Errol Cort - Minister of Finance & The Economy
 Hon. Donna Christensen - Member of Congress
 Hon. Carolyn Cheeks Klipfisch - Member of Congress

Ambassador Andrew Young
 Hon. Louise Lake Tack - Governor General of Antigua
 OR
 Prime Minister Hon. Baldwin Spencer

Ribbon Cutting

10:30am - 11:45am - PRESENTATION
 Theme: - DEVELOPMENT BANKS, PRIVATE DEBT AND EQUITY
 Venue: - Sandals Grande
 Chair/Moderator - Dr. Enrique Riggs
 Speaker: Hon. Maxine Waters - Member of Congress
 Hon. Compton Bourne - President, CDF
 Mr. Milton Lawrence, Chairman Financial Services Corporation
 Mr. Rudolph Cayl
 Hon. Dr. Dorell Douglas, Prime Minister/Minister of Finance, St. Kitts

10:30 - 11:45am CULTURE - PROMISE & POTENTIAL IN BUSINESS
 Remarks: -
 Speaker: Professor Rex Nettleford
 Hon. Howard Dotsen
 Patrick Payne
 Hon. Harold Lovell, Minister of Culture

12:00noon - 1:15pm
 Theme: - NATIONAL SECURITY: A PRE-CONDITION FOR SUCCESS
 Venue: - Sandals Grande
 Moderator - Leyland Hazlewood
 Remarks: - Reginald Canal

Keynote Speaker: Hon. Bennie Thompson - Member of Congress
Panelists: Hon. Dwyer Astephan, Minister of National Security
 Hon. Yvette Clarke - Member of Congress
 Hon. Colin V. A. Derick - Minister of Justice
 Attorney Sanford Rubenstein

12:00noon -1:15pm
Theme: EDUCATION - U. S AND CARIBBEAN SYNERGIES TO
 OVERCOME CHALLENGES
Remarks: Colka Ward
Speakers: Dr. Edison O. Jackson, President Medgar Evers College
 Hon. Donald Payne - Member of Congress
 Hon. Bertrand Joseph, Minister of Education

1:30pm -2:30pm - LUNCHEON
Theme: FINANCE COMMUNITY ORGANIZATIONS - VALUE
 AND ROLE
Remarks: Michael Waingan
Speakers: Eric Iva - CITI
 Hon. William Thompson, New York City Comptroller

3:00pm - 4:00pm -
ROUNDTABLES
IMMIGRATION
Visitors: Saadats Grande
Moderator: Dr. Marco Mason

Speakers - Hon. Barbara Lee - Member of Congress
 Hon. Yvette Clarke - Member of Congress
 Hon. Kendall Stewart - City Council member

DIVERSITY IN GROWTH & DEVELOPMENT

MACY'S - Outside Vendors

Ed Goldberg
 Cheryl Manroe
 State Senator Kevin Parker
 City Councilmember Inez Dickens

HATTI - IN TRANSFORMATION

Hon. Maxine Waters - Member of Congress

Hon. Yvonne Graham

Ambassador Andrew Young

PORT & AIRPORT SECURITY - THE MANDATE

Moderator : Mr. Lance Ogiste
 Hon. Benjis Thompson
 Hon. Dwer Asaphant

Venue Sandals Grande

Participant - Preferred Health Partners

Speakers - Hon. Barbara Lee - Member of Congress

Venue

Speaker - Hon. Gregory Meeks - Member of Congress ?
CARICOM REP. - TBD

5:00pm - 6:30pm -

Venue: - Multipurpose Cultural & Exhibition Centre - Ferry Bay

Theme - HEALTH - COMMON ISSUES - PROVEN SOLUTIONS - MOVE
Healthy Eating, Healthy Living

Remarks - Ms. Karen Boykin-Towles

Moderator - Dr. Marcia Bayne Smith

Keynote Speakers: - Dr. Denzil Douglas - Prime Minister St. Kitts/Nevis
Hon. Dr. Martin Valdes-Preferred Health Partners
Hon. John Herbert Maginley - Minister of Health, Sports & Youth
Dr. John Palmer
Hon. Diane Watson, Member of Congress

6:30:00pm - 10:00 pm - HOST COUNTRY EVENING
Hosted by Prime Minister Baldwin Spencer

Venue - Multipurpose Cultural and Exhibition Centre - Ferry Bay

10:00pm - 1:00am - Hospitality Area

Venue: - Sandals Grande - Reflection Pool

Saturday, November 10, 2007

8:00am - 10:00am

Venue: - Sandals Grande - Main Ballroom

Theme: - WOMEN AND EMPOWERMENT IN THE DIASPORA

Remarks - Brenda Scott

MC - Marilyn Johnson

Speakers - Hon. Diana Abbott, MP UK
 Commissioner Sarah Westcott-Williams,
 Hon. Caroline Cheeks Kilpatrick, Member of Congress
 Hon. Eddie Bernice Johnson - Member of Congress
 Dr. Marcelle Maxwell
 Ms. Toni Ray
 Governor General - Dame Louise Lake Tak - check
 Ms. Luelle McEwen, President/CBO HCCI
 Commissioner Westcott-Williams, Leader of Government

10:15am - 11:45pm - PRESENTATION

Theme - HEALTH - REAL INVESTMENT OPPORTUNITIES IN UPGRADING
 CARE AND DELIVERY

Venue - Sandals Grande

Greeting - Karen Boykin-Townes - Pfizer

Chair/Moderator - Hon. Yvonne Graham

Keynote - Dr. Derril Douglas - Prime Minister St. Kitts/Nevis

Panelists
 Hon. John Herbert McGintley, Minister of Health
 Dr. Marcia Bayne-Smith
 Dr. Carl Kendall Pierre, Preferred Health Partners

10:15am-11:45am
 Theme - TRAVEL & TOURISM EXPANSION -THE DIASPORA AS CATALYST
 Venue - Sandals Grande
 Chair/Moderator - Mr. Lloyd Williams, GKCC
 Speakers - Hon. Lorna Richardson - Member of Congress
 Hon. Harold Lovell, Minister of Tourism, Antigua & Barbuda
 Hon. Howard Dotson, Director Schomburg Center

12 noon-1:15pm - PRESENTATION
 Theme - TECHNOLOGY & COMMUNICATION - SHARING
 Venue - Sandals Grande
 Remarks - Ms. Marie Long
 Keynote Speakers - Hon. Ed Towne - Member of Congress
 Hon. Edite Bernice Johnson - Member of Congress
 Dr. Edmund Mansoor - Member of State
 Dr. Emmanuel Gonsalves

12:00noon - 1:15pm -
 Theme - INTEGRATING THE DIASPORA IN BUSINESS - INVESTORS MANAGERS, MENTORS & TRAINERS

Venue - Sandals Grande
Moderator - Roy Hastick
Participant - HSBC
Remarks - Mr. Javier Evans
Speakers - Hon. Compton Boutin
 Hon. Adolfo Carrion, Bronx Borough President
 Hon. Carolyn Cheeks Kilpatrick - Member of Congress
 Hon. Professor Rex Nettleford

1:30 - 2:00 p.m. - LUNCH

Theme - CARIBBEAN TRADE COMPETITIVENESS AND POSITIONING

Venue - Sandals Grande
Remarks - Wallace Ford - Goodworks International
Keynote Speaker - Hon. Billie Miller - Minister of Foreign Affairs & Foreign Trade
 Hon. Charles Rangel - Member of Congress

2:30pm - 6:30pm
Optional:
3:00pm - 4:00pm - ROUND TABLE
Venue - Sandals Grande

Round Table #1Theme : CARIBBEAN - A COMPETITIVE HEALTH CARE DESTINATION

Venue

Remarks : Dr. Lesly Keenleyside

Speakers : Dr. Dexter McKenzie

Hon. Yvonne Grayson

Round Table #2

Theme - HEMISPHERIC DISASTER FUND

Venue - Sandals Grande

Speakers Hon. Yvette Clarke - Member of Congress

Mr. Leyland Hazlewood

Mr. Emmanuel Gonsalves

Participant

Round Table #3

Theme - CLOSING THE GENERATION GAP

Speaker - Hon. Yvette Clarke - Member of Congress

Kandisa Rodney

Lita Dalram

Sabrina Hosang

Wintropo Wellington

Venue - Sandals Grande

Participant

Round Table #4

Theme : PASSPORT & ADMINISTRATIVE CONSTRAINTS ON TOURISM

Venue : Sandals Grande

Speakers : Hon. Harold Lovell - Minister of Tourism
Mr. Lloyd Williams, GHCC
Hon. Dairyl Towne, State Assemblyman

5:00pm - 6:30pm - COMMUNITY OUTREACH -

EDUCATION & YOUTH DIRECTION - ACCESS AND
COLLABORATION

Venue : Multipurpose Cultural & Exhibition Centre

Moderator : Michael Flavinigan

Speakers : Dr. Edison Jackson - President Medgar Evers College
Hon. David M. Dinkins - Former Mayor New York City
Hon. Eddie Bernice Johnson - Member of Congress
Hon. Bertrand Joseph

6:30 - 7:30pm - GALA RECEPTION

Venue : Sandals Grande

Speaker : Hon. Stephanie Tubbs-Jones, Member of Congress
Hon. Billie Miller, Minister of Foreign Affairs,
Minister of Government ... Antigua

Theme:

7:30 - 10:00 pm : GALA DINNER & AWARDS

Theme :

Venue : Sandals Grande - Main Ballroom

Speakers : Hon. Charles Rangel - Member of Congress
 Hon. Maxine Waters - Member of Congress

Keynote Speaker : Prime Minister Hon. Baldwin Spencer

 Presentation of the Marcus Garvey "Bridge Builder" Awards

Hospitality Area

10:30pm - 1:00am

Venue:

Sunday, November 11, 2007

8:30 am - 10:00am - POWER BREAKFAST

Theme - UNDERSTANDING THE SPIRITUAL ROOTS AND
 MAKING IT WORK

Celebrant - Ed Goldberg
 Lowell Hawthorne
 Caribbean person - TBD

Selection

Theme:

Selection:

10/16/07

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Exhibit 22

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re: Staff Member 1 of Congressman Rangel's Office
Review #: 09-6333; 09-2567; 09-4403; 09-3698; 09-2222
Date: May 27, 2009 and May 28, 2009
Location: Washington, DC (via telephone on May 27, 2009) and at Rayburn HOB 354 (on May 28, 2009)
Time: 4:10pm to 5:30 p.m. (approximately) and 3:30pm to 4:00pm (approximately)
Participants: Leo Wise
Omar Ashmawy

Summary: Staff Member 1 of Congressman Rangel's Office is currently the chief of staff of Representative Charles Rangel, a Member of the United States House of Representatives representing the Fifteenth District of New York. He was interviewed pursuant to Review 09-2567; 09-4403; 09-3698; 09-6333; and 09-2222. We requested an interview with Staff Member 1 of Congressman Rangel's Office and he consented to an interview. Staff Member 1 of Congressman Rangel's Office's counsel was present. Staff Member 1 of Congressman Rangel's Office made the following statements in response to our questioning:

1. Staff Member 1 of Congressman Rangel's Office was given an 18 U.S.C. § 1001 warning and consented to an interview. Staff Member 1 of Congressman Rangel's Office signed a written acknowledgement of the warning. [attached]
2. Staff Member 1 of Congressman Rangel's Office did not attend the 13th Annual Caribbean Multi-National Business Conference although he received an invitation. In response to a Request for Information by OCE, Staff Member 1 of Congressman Rangel's Office looked for Representative Rangel's invitation to the conference, but could not find it. He had thought Representative Rangel had received one, but because he could not find the invitation he now thinks that Representative Rangel did not receive one.

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

3. Representative Rangel could have been invited orally as he has been attending the conference for years and was seen almost as a partner. He attends the conference because he is dedicated to strengthening the relationships between the Caribbean community, the African-American community of New York City and in general, and the United States.
4. The question of whether Representative Rangel would attend the conference in 2008 was a difficult one because of the negative press he had received throughout the preceding summer. Representative Rangel was cautious about attending because he didn't want to be a target for additional negative publicity, but Staff Member 1 of Congressman Rangel's Office and others on the Member's staff argued that he should go to the conference. They argued that if Representative Rangel did not attend he would be rejecting the friends with whom he helped build the conference and that the Member had to stand up and do the right thing despite the possible negative publicity.
5. Ultimately, Staff Member 1 of Congressman Rangel's Office and his staff persuaded the Member to attend. Representative Rangel decided to keep a low profile and, unlike in past years, staff would not attend the conference with the Member.
6. Staff Member 1 of Congressman Rangel's Office stated that the CaribNews Foundation invited the Member. The CaribNews Foundation is the charitable arm of the newspaper. When the rules changed in 2007 and corporations could not be involved as before – i.e. direct contributions to the conference – there was “talk” about how to do the conference in light of the new rules.
7. According to Staff Member 1 of Congressman Rangel's Office, there was “talk” that the Rodneys needed an entity to create a common fund so that the corporate money could be used to pay for the conference and that the CaribNews Foundation could be used for that purpose.
8. Staff Member 1 of Congressman Rangel's Office initially stated that he did not remember how he was aware of this “talk.” He stated that part of it was his reading of the rules and the supplemental material about how things get done. He then stated that “we” celebrated when Representative Susan Tubbs-Jones was made the chair of the Standards Committee in 2007 because she would try to create a way for Members of Congress to continue to attend the conference. Staff Member 1 of Congressman Rangel's Office then stated that he was made aware of the “talk” through the Rodneys and that the Rodneys told Staff Member 1 of Congressman Rangel's Office that Representative Tubbs-Jones was going to have her counsel, Dawn Kelly-Mobley, find a way to make the conference work. The Members would have a few more hoops to go through but “we” would find a

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

- way. Representative Tubbs-Jones would let Ms. Mobley know the conference was a priority and tell her to make it possible. Representative Tubbs-Jones made Ms. Mobley the point of contact on the issue of the conference.
9. Staff Member 1 of Congressman Rangel's Office stated that Representative Rangel also mentioned that Representative Tubbs-Jones told him something similar. Staff Member 1 of Congressman Rangel's Office stated that there was talk about "keeping the conference going." He also stated that "They gave us the framework to keep the conference going." "They" referred to Ms. Mobley and Representative Tubbs-Jones.
 10. Staff Member 1 of Congressman Rangel's Office did not remember any specific conversations with Ms. Mobley, but he would have had them because he would have wanted to make sure he followed her advice. He stated that the 2007 conversations about Standards Committee finding a way to keep the conference going may have also been with Patricia Louis, the Rodney's office manager.
 11. Regarding the structure of the CaribNews Foundation, Staff Member 1 of Congressman Rangel's Office said that the role of the foundation was more formalized as a way to handle the new rules and that it would have come from the Standards Committee staff. The Rodney's were the first people to describe the new structure to Staff Member 1 of Congressman Rangel's Office following their conversation with Ms. Mobley. The Rodney's told Staff Member 1 of Congressman Rangel's Office that they could easily comply because they had always done the conference through the foundation. The Rodney's told him that it should have always been called the CaribNews Foundation's conference.
 12. Before 2007, Staff Member 1 of Congressman Rangel's Office knew that the corporations had a role in the conference because the format was in part to bring businesses together. Members of Congress would talk policy, but the Members' presence was the glamour part of the conference and a way to attract more people. However, policy was not the central focus of the conference. The central focus of the conference was business and increasing investment in the region. The Members of Congress drew government officials from the various Caribbean governments and these government officials drew the businesses.
 13. Staff Member 1 of Congressman Rangel's Office was aware the involvement of other corporations like AT&T, Macy's, Citi, etc because they were pretty consistent supporters of the conference. It was clear they were supporters of the conference financially.

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

14. Staff Member 1 of Congressman Rangel's Office did not talk to Representative Rangel about these matters because the Member does not require that level of detail and does not typically ask for specifics.
15. Staff Member 1 of Congressman Rangel's Office did not remember how he became aware of the 2007 rule changes and did not remember attending any briefings or training about the new rules. He thought he was aware of the limits on the number of days a Member could attend an event paid for by an entity that employs a lobbyist, but he was not certain. Mr. Daley did not think he was aware of rules that made an entity that earmarked money for a trip a sponsor of that trip.
16. In response to the question: At the time of the 2007/2008 conferences, how sponsor was defined? Staff Member 1 of Congressman Rangel's Office stated that the New York CaribNews Foundation was the sponsor of the conference because they were putting on the conference with money from a general fund that would pay for the conference. At that time he became conscious of a need for a 501(c)(3) to be the sponsor.
17. Over the course of several phone calls-- most often with Patricia Louis and Faye Rodney, Karl Rodney's wife -- Staff Member 1 of Congressman Rangel's Office learned that the CaribNews Foundation was going to raise money from their traditional donors and other entities.
18. The government of St. Maarten was the lynchpin of the 2008 conference. They were the conference's host and they had specific requirements, as host, that were financial in nature. For instance, when a host government owns a conference center and/or hotel then they give the rooms and conference space for free. If they do not own space, then they have to arrange with a hotel to give rooms and space to the conference at an affordable amount. Other host government support includes police escorts, airport greeting services, and security services. They also host an opening reception and key components of the conference.
19. Although it was not typical, Staff Member 1 of Congressman Rangel's Office became the scheduler for Representative Rangel's travel to the conference in 2008 because he played a part in convincing him to go. Staff Member 1 of Congressman Rangel's Office made the reservations for the Member, but did not remember how he did it or whether the Representative had an e-ticket or a ticket in some other form. He did not remember receiving any airline itinerary documents, but it would have been common practice for him to receive one.

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

20. Staff Member 1 of Congressman Rangel's Office was shown the pre-travel clearance form submitted to the Standards Committee and stated that he filled it out and the Member signed it. He was shown the post-travel disclosure forms that were submitted to the Standards Committee and stated that he filled them out and the Representative signed them.
21. Staff Member 1 of Congressman Rangel's Office initially said he got the information to fill out the post-travel forms from the Rodneys and stated that he remembered getting a memo from the Rodneys with the cost of the various aspects of the trip on it and that the memo was where he got the dollar amounts for the post-travel forms. He was then asked to explain why the numbers on the post-travel form matched the pre-travel form and not the memo from the Rodneys. Staff Member 1 of Congressman Rangel's Office then said that he could not say for sure that he got the numbers from the memo. He did not remember if the numbers were from the memo or from the pre-travel forms. He was not sure if he checked the cost of the airfare against the airline tickets or if he got it from the pre-travel documents or from the memo.
22. Generally speaking, however, Staff Member 1 of Congressman Rangel's Office would not look behind the numbers given by the Rodneys. He would assume the Rodneys were accurate. Staff Member 1 of Congressman Rangel's Office was not certain how it was done, but thought that the accounting for the conference was simple and the information for each Member would be the same. He did not ask the Rodneys for supporting documentation for the numbers on the memo.
23. After the conference, he spoke to Representative Rangel generally about the event. When the article by Susan Crabtree was published there was a lot of talk about the subject of the article with several people. Staff Member 1 of Congressman Rangel's Office did not remember with whom he spoke. He then said that he spoke with the Rodneys and the Member. Overall there was an opinion that there could not be anything substantive to the article because the travel was approved by the Standards Committee. It was true that the corporations were at the conference, but they did not have anything to do with their Washington, DC agenda because that's not who attended the conference. His conversations with Representative Rangel were brief and were limited to reassuring him that the office followed the rules and got approval for the travel.
24. After the OCE review was initiated Staff Member 1 of Congressman Rangel's Office - called other members of the Congressional Black Caucus. Representative Rangel asked him to make the calls and to tell them that he would stand by them and offered his help.

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

25. Staff Member 1 of Congressman Rangel's Office recalled a conversation with Representative Carolyn Kilpatrick's chief of staff, Kim Rudolph. Ms. Rudolph addressed the comments that Representative Kilpatrick made in which she thanked the sponsors of the conference. Staff Member 1 of Congressman Rangel's Office explained Representative Kilpatrick's statements to OCE by saying that that regardless of who the real sponsor of the event was, when Members thank the corporations it helps the Rodney's put on the conference -- even if the sponsors are not sponsors under the rule. Staff Member 1 of Congressman Rangel's Office also remembered speaking to Shelly Thomas, Delegate Donna Christensen's scheduler, but did not recall the specifics of the conversation.
26. Staff Member 1 of Congressman Rangel's Office was not aware of any limits on a private foundation paying for overseas travel. He did not know whether the CaribNews Foundation was a private foundation or a public charity.
27. Staff Member 1 of Congressman Rangel's Office was shown a copy of Congressman Rangel's itinerary and a receipt for an electronic ticket. Staff Member 1 of Congressman Rangel's Office stated that he did not remember seeing it before, but that the itinerary was the type of document that would typically be placed in the Congressman's briefing book so that he could provide the information at the airport in order to get his ticket. Staff Member 1 of Congressman Rangel's Office also pointed out that the receipt for the electronic ticket was the sort of document that would only be provided after the Congressman checked in for his flight.

I prepared this Memorandum of Interview on May 28, 2009 after interviewing Staff Member 1 of Congressman Rangel's Office on May 27, 2009. I certify that this memorandum contains all pertinent matter discussed with Staff Member 1 of Congressman Rangel's Office on May 27, 2009.

Omar Ashmawy
Investigative Counsel

Exhibit 23

1180



TEL: (212) 944-1991; FAX: (212) 944-2089
E-MAIL ADDRESS: NYCARIB@AOL.COM;
CARIBNEWS@ATT.NET

FACSIMILE TRANSMITTAL SHEET

TO:	Kelly Mobley	FROM:	Patricia Louis
COMPANY:	Committee on Standards of official conduct	DATE:	8/20/08
FAX NUMBER:	202-225-7392	TOTAL NO. OF PAGES INCLUDING COVER:	
RE: 2008 MULTINATIONAL BUSINESS CONFERENCE			

URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY YOUR INFORMATION

Following is the completed form and attachments re travel for Members of Congress to attend the 2008 Multinational Business Conference scheduled for November 6-9, 2008 in St. Maarten.

Regards

09-4403 0263

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CN-000112



Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10017
Tel: (212) 944-1991. Fax: (212) 944-2089
E-mail: info@caribnewsconference.com

CARIB NEWS FOUNDATION is organized to provide education and information about the Caribbean in the area of Business, Education, Health and Culture, Promote Good neighborly within the United States and the hemisphere.

The participants are selected to participate in the various workshops during the Conference based on their demonstrated interest, expertise and assignment in the United States Congress.

Organized by Carib News Foundation. A non-profit project 501-C3 corporation

09-4403 0264

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CN-000113

U.S. House of Representatives
Committee on Standards of Official Conduct

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM
(provide directly to each House invitee)

This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers or employees under House Rule XXV, clause 5. A completed copy of the form (and any attachments) should be provided to each invited House Member, officer or employee, who will then forward it to the Committee. The trip sponsor should NOT submit the form directly to the Committee.

Private sponsors are urged to submit this form to each House invitee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the invitee not receiving approval for the trip. The submission of an incomplete form will delay the review process. Before completing this form, sponsors are urged to carefully review the Committee's private travel guidelines and advisory memoranda detailing the rules and restrictions for private travel, as well as the instructions for completing this form. Sponsors should call the Committee with any questions prior to submitting the form. Please type form.

1. Sponsor(s) (who will be paying for the trip): OARIB NEWS FOUNDATION
2. I represent that the trip will not be financed (in whole or in part) by a federally-registered lobbyist or a registered foreign agent (signify "yes" by checking box):
3. I represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip (signify "yes" by checking box):
4. Is travel being offered to an accompanying family member of the House invitee(s)? Yes No
5. Provide names and titles of ALL House invitees; for each invitee, provide explanation of why the individual was invited (include additional pages if necessary): BASED ON COMMITTEE OR SUB-COMMITTEE WHICH IMPACTS US/CARIBBEAN RELATIONS ON WHICH THE MEMBER SERVES.
6. Dates of travel: NOVEMBER 8-9, 2008
7. Cities of departure - destination - return: VARIES - DEPENDING ON MEMBER
8. Attached is a detailed agenda of the activities taking place during the travel (i.e., an hourly description of planned activities) (signify "yes" by checking box):
9. I represent that (check one of the following):
 - a. The sponsor of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965: or
 - b. The sponsor of the trip does not retain or employ a federally registered lobbyist or registered foreign agent: or
 - c. The trip is for attendance at a one-day event and lobbyist involvement in planning, organizing, requesting, or arranging the trip was *de minimis* under the Committee's travel regulations.
10. If travel is for participation in a one-day event (i.e., if you checked Question 9(c)), check one of the following:
 - a. One-night's lodging and meals are being offered: or
 - b. Two-nights' lodging and meals are being offered:
 If "b" is checked, explain why the second night is warranted: _____

09-4403 0265

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11. If the trip is not sponsored by an institution of higher education, I represent that a federally-registered lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip (signify "yes" by checking box):

12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip: CARIB NEWS FOUNDATION (* SEE ATTACHED)

13. Describe each sponsor's organizational interest in the purpose of the trip: THE INTEREST OF CARIB NEWS FOUNDATION IS TO PROMOTE, INFORM, TRADE AND ESTABLISHMENT OF MEANINGFUL CONNECTIONS BETWEEN THE U.S AND THE CARIBBEAN

14. Describe the type and class of the transportation being provided. Indicate whether coach, business-class or first-class transportation will be provided. In addition, for travel via aircraft, please indicate if travel is being offered on a commercial flight, chartered flight or on an aircraft operated or paid for by a carrier not licensed by the Federal Aviation Administration to operate for compensation or hire (i.e., a private aircraft). If first-class fare is being provided, or if travel is via chartered or private aircraft, please provide an explanation describing why such travel is warranted: REGULAR SCHEDULED AIR SERVICE, ECONOMY CLASS

15. I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s). (signify "yes" by checking box):

16. I represent that either (check one of the following):
a. The trip involves an event that is arranged or organized without regard to congressional participation and that meals provided to congressional participants are similar to those provided to or purchased by other event attendees: or
b. The trip involves events that are arranged or organized specifically with regard to congressional participation:
If "b" is checked, detail the cost per day of meals (approximate cost may be provided): _____

17. Reason for selecting the location of the event or trip: SEE ATTACHED

18. Name of hotel or other lodging facility: SONESTA MAHO BEACH RESORT

19. Cost per night of hotel or other lodging facility (approximate cost may be provided): \$110.00

20. Reason(s) for selecting hotel or other lodging facility: HAS APPROPRIATE MEETING ROOMS


21. TOTAL EXPENSES FOR EACH PARTICIPANT:

<input type="checkbox"/> Actual amounts <input type="checkbox"/> Good faith estimates	Total Transportation Expenses per Participant	Total Lodging Expenses per Participant	Total Meal Expenses per Participant
For each Member, Officer, or employee	410	260	145
For each accompanying family member	410	0	145

	Other Expenses (dollar amount)	Identify Specific Nature of "Other" Expenses (e.g., taxi, parking, registration fee, etc.)
For each Member, Officer, or employee	\$150	Conference Registration
For each accompanying family member	\$ 25	Local transportation

22. I represent that reimbursement for miscellaneous travel expenses for the trip, such as travel to and from airports, security costs, interpreter fees, visa application fees, and similar expenses, will be for actual costs incurred and are necessary for the purpose of the trip (initially "Yes" by checking box): Yes

23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: 
 Name and title: KARL B. RODNEY, CEO
 Organization: CARIB NEWS FOUNDATION
 Address: 7 WEST 38th STREET, 8th FLOOR, NEW YORK, NY 10018
 Telephone number: (212) 944-1991
 Fax number: (212) 944-2089
 Email Address: CARIB-DESK@ATT.NET

The Committee staff may contact the above individual above if additional information is required.

If there are any questions regarding this form please contact the Committee at the following address:

Committee on Standards of Official Conduct
 U.S. House of Representatives
 HT-2, The Capitol
 Washington, DC 20515
 (202) 225-7103 (phone)
 (202) 225-7392 (general fax)
 (202) 226-7172 (fax for travel approvals)

Version date 4/2007 by Committee on Standards of Official Conduct

MEMBERS OF CONGRESS INVITED TO THE
THIRTEENTH ANNUAL MULTI-NATIONAL BUSINESS
CONFERENCE, NOVEMBER 6-9, 2008, ST. MAARTEN, N.A.

Congresswoman Diane E. Watson
Congressman David Scott
Congressman James Clyburn
Congresswoman Nydia Velazquez
Congressman Charles Rangel
Congressman Donald Payne
Congresswoman Donna M. Christensen
Congressman Edolphus Towns
Congressman G. K. Butterfield
Congressman Gregory Meeks
Congressman Jesse Jackson Jr.
Congressman Keith Ellison
Congressman Kendrick Meek
Congresswoman Maxine Waters
Congressman Melvin Watt
Congressman Robert Scott
Congressman William Lacy Clay
Congresswoman Barbara Lee
Congresswoman Caroline Cheeks Kilpatrick
Congresswoman Corrine Brown
Congresswoman Eddie Bernice Johnson
Congresswoman Sheila Jackson Lee
Congresswoman Yvette Clarke
Congressman Danny Davis
Congressman Bennie Thompson
Congresswoman Laura Richardson

July 2008

09-4403 0268

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CN-000117



Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10017
Tel: (212) 944-1994; Fax: (212) 944-2089
E-mail: info@caribnewsconference.com

Item #12

CARIB NEWS FOUNDATION is organized to provide education and information about the Caribbean in the area of Business, Education, Health and Culture, Promote Good neighborly within the United States and the hemisphere.

The participants are selected to participate in the various workshops during the Conference based on their demonstrated interest, expertise and assignment in the United States Congress.

Item#17

A Caribbean country whose proximity to other Caribbean Countries makes it conveniently located for delegates from the other Caribbean countries to attend.

Organized by Carib News Foundation. A non-profit project 501-C3 corporation

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CN-000118

**MEMBERS OF CONGRESS INVITED TO THE
13th Annual Multinational Business Conference
St. Maarten, November 6-9, 2008**

Congressman William Lacy Clay
U.S House of Representatives
131 Cannon HOB
Washington, DC 20515
Phone: 202-225-2406
Fax: 202-226-3717

Congresswoman Diane E. Watson
US House of Representatives
125 Cannon HOB
Washington, DC 20515
Phone: 202-225-7084
Fax: 202-225-2422

Congressman Kendrick Meek
U.S House of Representatives
1039 Longworth HOB
Washington, DC 20515
Phone: 202-225-4506
Fax: 202-226-0777

Congressman David Scott
U.S House of Representatives
417 Cannon HOB
Washington, DC 20515
Phone: 202-225-2929
Fax: 202-225-4268

Congressman James Clyburn
US House of Representatives
2135 Rayburn HOB
Washington, DC 20515
Phone: 202-225-3315
Fax: 202-225-9253

Congressman Robert Scott
U.S House of Representatives
1201 Longworth HOB
Washington, DC 20515
Phone: 202-225-8351
Fax: 202-225-8354

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CN-000119

Congresswoman Nydja Velázquez
U.S House of Representatives
2241 Rayburn HOB
Washington, DC 20515
Phone: 202-225-2961
Fax: 202-226-0327

Congressman Charles Rangel
U.S House of Representatives
2354 Rayburn HOB
Washington, DC 20515-3215
Phone: 202-225-4365
Fax: 202-225-0186

Congressman Donald Payne
U.S House of Representatives
2209 Rayburn HOB
Washington, DC 20515
Phone: 202-225-3436
Fax: 202-225-4160

Congresswoman Donna M. Christensen
U.S House of Representatives
1510 Longworth HOB
Washington, DC 20515
Phone: 202-225-1790
Fax: 202-225-5517

Congressman Edolphus Towns
U.S House of Representatives
2232 Rayburn HOB
Washington, DC 20515
Phone: 202-225-5936
Fax: 202-225-6018

Congressman G. K. Butterfield
U.S House of Representatives
413 Cannon HOB
Washington, DC 20515
Phone: 202-225-3101
Fax: 202-225-2256

Congressman Gregory Meeks
U.S House of Representatives
1710 Longworth HOB
Washington, DC 20515
Phone: 202-225-3461
Fax: 202-225-4169

09-4403 0271

Congressman Jesse Jackson Jr.
 U.S House of Representatives
 2419 Rayburn HOB
 Washington, DC 20515
Phone: 202-225-0773
Fax: 202-225-0899

Congressman Keith Ellison
 U.S House of Representatives
 1130 Longworth HOB
 Washington, DC 20515
Phone: 202-225-4755
Fax: 202-225-4886

Congressman Kendrick Meek
 U.S House of Representatives
 1039 Longworth HOB
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Phone: 202-225-4506
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Congresswoman Maxine Waters
 U.S House of Representatives
 2324 Rayburn HOB
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Fax: 202-225-7854

Congressman Melvin Watt
 U.S House of Representatives
 2236 Rayburn HOB
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Fax: 202-225-1512

Congresswoman Barbara Lee
 U.S House of Representatives
 2444 Rayburn HOB
 Washington, DC 20515
Phone: 202-225-2661
Fax: 202-225-9817

Congresswoman Caroline Cheeks Kilpatrick
 U.S House of Representatives
 1610 Longworth HOB
 Washington, DC 20515
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CN-000121

Congresswoman Corrine Brown
U.S House of Representatives
2444 Rayburn HOB
Washington, DC 20515
Phone: 202-225-0123
Fax: 202-225-2256

Congresswoman Eddie Bernice Johnson
U.S House of Representatives
1511 Longworth HOB
Washington, DC 20515
Phone: 202-225-8885
Fax: 202-225-1477

Congresswoman Sheila Jackson Lee
U.S House of Representatives
410 Canon HOB
Washington, DC 20515
Phone: 202-225-3816
Fax: 202-225-3317

Congresswoman Yvette Clarke
U.S House of Representatives
1029 Longworth HOB
Washington, DC 20515
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Fax: 202-225-0112

Congressman Danny Davis
U.S House of Representatives
1222 Longworth HOB
Washington, DC 20515
Phone: 202-225-5006
Fax: 202-225-5641

Congresswoman Stephanie Tubbs-Jones
U.S House of Representatives
1516 Longworth HOB
Washington, DC 20515
Phone: 202-225-7032
Fax: 202-225-1539/2367

Congressman Bennie Thompson
U.S House of Representatives
2432 Rayburn HOB
Washington, DC 20515
Phone: 202-225-5876
Fax: 202-225-5898

09-4403 0273

4

Working Copy

13th Annual Caribbean Multi-National
Business Conference Program
St. Maarten, N.A.

**THEME: A REGION IN TRANSITION - STRATEGY FOR
CHANGE - BUILDING ALLIANCES**

Thursday, November 6, 2008

12:00 noon - 6:00pm : CONFERENCE REGISTRATION -

5:00 - 6:30 - TOWN HALL FORUM - HEALTH

Healthy Eating and Living

Innovative Solutions for Life styles
Diseases- a Collaborative Approach - Diabetes,
Hypertension, Obesity, Oral Health

Venue - ROYAL ISLANDER

Moderator - Dr. Marcia Bayne Smith

Speakers - Mrs. Karen Boykin-Towns

Congressmember Dr. Donna Christian Christensen

Commissioner Maria Buncamper Molanus, Health

Commissioner, St. Maarten

Dr. Leon Merrick

Dr. Jay Cohan

Dr. John Palmer

6:30- 7:30pm. - OPENING RECEPTION

Venue: - UPPER POOL

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1192

Theme: - *A REGION IN TRANSITION* -
Speakers: - Faye A. Rodney
Hon. Roy Marlin - Commissioner for Tourism & Finance - St
Maarten.

MC: - Sabrina Hosang - Royal Caribbean Bakery
7:30 - 9:30 pm - OPENING DINNER

Venue: - MAHO ROOM

Theme: - *STRATEGY FOR CHANGE*
MC - Judge Sylvia Hinds-Radix
Speakers: - Susan Taylor
Hon. Donald Payne, Member US Congress

10:00pm - 1:00am: - HOSPITALITY AREA

Friday, November 7, 2008

8:00am - 8:45am - (BREAKFAST) - OCEAN TERRACE

2
09-4403 0275

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CN-000124

9:00am - 6:00pm	CONFERENCE REGISTRATON OCEAN TERRACE LOBBY
	CONFERENCE SECRETARIAT SABA ROOM

9:00am - 10:15am - **OPENING CEREMONIES**

Venue: - **MAHO ROOM**

Theme: - **BUILDING ALLIANCES FOR PROGRESS**

Invocation: - **Rev. Susan Johnson-Cook**

Anthems: - **St. Maarten
Lift Every Voice**

Remarks: - **Eric Eve
Karen Boydln-Towns
Marie Long
Ed Goldberg
Patrick Gaston
Hazel Dukes**

Speakers: - **Hon. Carolyn Checks Kilpatrick - Member
US Congress
Commissioner Sarah Wescot-Williams, Leader
of Government, St. Maarten
Harry Belafonte**

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CN-000125

RIBBON CUTTING CEREMONIES

10:15am - 10:30am - COFFEE BREAK -

10:30am - 11:45am - PRESENTATION

EDUCATION -- TECHNOLOGICAL ADVANCES - COLLABORATION

Moderator - Dr. Emmanuel Gonsalves
Greetings - Marie Long
Speakers - Dr. Edison Jackson
Patrick Gaston
Dr. Marcia Kelzs
Congressmember Eddie Bernice Johnson
Professor Rex Nettleford

12:00 noon - 1:15p.m. PRESENTATION

TRAVEL AND TOURISM -

A Transformative Approach

Moderator - Lloyd Williams
Greetings - Wallace Ford
Speakers - Commissioner Roy Marlin
Howard Dodson
Congressman Gregory Meeks
Professor Rex Nettleford
Dr. Martin Valdes

1195

12:00 noon - 1:15p.m - PRESENTATION
*HEALTH - AN ECONOMIC DEVELOPMENT
STRATEGY FOR THE REGION*

Greetings - Karen Boydin-Townis

Moderator - Yvonne Graham

Speakers - Dr. Denzil Douglas
Dr. Carl Kenel Pierre
Commissioner Maria Buncamper Molanus, Health
Commissioner, St. Maarten
- Dr. Dexter McKenzie

1:30pm - 2:30pm - LUNCHEON

Venue: - Main Ballroom

Theme: - *BUILDING A WINNING STRATEGY - PARTNERSHIPS
THAT WORK*

Moderator: - Hon. Nick Perry, NYS Assembly

Speakers - Eric Eve

Keynote Speaker - Hon. David Paterson, Governor New York State

3:00pm - 4:00pm

Round Table # 1 -

Theme - *EDUCATION - THINKRINITY PRESENTATION &
DEMONSTRATION*

5

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CN-000127

Venue - Royal Islander A
 MC - Dr. Patricia Hazlewood
 Speakers - Patrick Gaston
 Albert Browne

Round Table #2 -

Theme - *LOCAL BUSINESS INITIATIVES*
Opportunities with US Companies

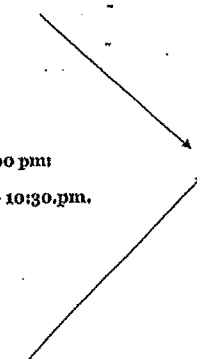
Venue - Royal Islander B
 Speakers: - Ed Goldberg
 Eric Eve
 Albert Browne

4:30pm - 6:00pm - *TOWN HALL FORUM - EDUCATION*

Venue - Royal Islander A
 Theme : *EDUCATION - SHARING WORKING SOLUTIONS*
 Greetings : Michael Flanigan
 Moderator : Dr. Marcella Maxwell

Speakers: - Hon. David M. Dinkins - Former Mayor, NYC
 Dr. Edilson O. Jackson
 Dr. Marcia Keizs
 Professor Rex Nettieford, UWI
 William Payne, Assemblyman New Jersey

Venue:
6:30:10:00pm - 7:30pm - *HOST COUNTRY EVENING*
Venue:
Theme
MC:
Speakers: **CULTURAL PRESENTATION**
7:30 - 8:00 pm
8:00pm - 10:30 pm.
Venue :
Theme



10:00pm - 11:00am - *HOSPITALITY AREA*

Venue:

Saturday, November 8, 2008

7:45 am - 8:15 am = BREAKFAST
Venue - OCEAN TERRACE
8:30am - 10:00am - PRESENTATION
Theme WOMEN OF INFLUENCE AND POWER
Venue: - MAHO BEACH

Greetings & Opening Remarks - - **Brenda Scott**

Moderator - **Marilyn Johnson**

Speakers: - **Commissioner Sarah Wescot-Williams, Leader of Government Business**
Dame Billie Miller, former Deputy Prime Minister, of Barbados
Dr. Marcia Keiza, President York College
Michelle Paterson, First Lady New York State
Congresswoman Eddie Bernice Johnson
Rev. Dr. Susan Johnson-Cook

10:15am - 11:45am - **PRESENTATION**

Theme - **THE CARIBBEAN, IT'S VALUE & POTENTIAL**

Venue - **Royal Islander A**

Greetings - **Wallace Ford**

Moderator - **Dame Billie Miller**

Speakers - **Hon. P. J. Patterson, former Prime Minister, Jamaica**
Hon. Dr. Ralph Gonsalves, Prime Minister St. Vincent and the Grenadines
Hon. Dr. Denzil Douglas, Prime Minister, St. Kitts-Nevis
Congressman Charles Rangel

12:00 noon - 1:30 p.m. - **PRIVATE MEETING -- CLOSED DOOR SESSION**
with Members of Congress and Ministers of Government

1200

Theme: *CARIBBEAN -- A SOLID INVESTMENT*

Greetings - Hon. Darryl Towns

Speakers - Hon. William Thompson, NYC Comptroller
Dr. Compton Bourne, President CDB

Round Table #1 - *IMMIGRATION/DEPORTEES*

Venue - Royal Islander A

Moderator - Dr. Marco Mason

Speakers Congressman Bennie Thompson
Hon. Eddie Bernice Johnson, Member US Congress
Attorney Stanford Rubenstein
NYC Councilmember Dr. Kendall Stewart

Round Table#2: - *HAITI -- BOLD INITIATIVES -- THE DIASPORA-
CBC AND CARICOM*

Venue - Royal Islander B

Moderator - Hon. Yvonne Graham

Speakers - Hon. Charles Rangel
Hon. Gregory Meeks
Hon. Ralph Gonsalves
Dr. Lesly Kernisant

4:30 pm -- 6:00pm - *TOWN HALL FORUM - TECHNOLOGY*

Venue: Royal Islander A

10

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1201

Greetings & Opening - Marie Long

Moderator - Colln Ward

Speakers - Congressman Edolphus Towns
Albert Brown
Commissioner of Technology

6:30 - 7:30pm - GALA RECEPTION

Speakers - Susan Taylor

7:30pm - 10:00pm - GALA DINNER & AWARDS PRESENTATION

Speaker - Dr. Harry Belafonte
Hon. Sarah Wescot-Williams, Leader of Government
Business

AWARDS PRESENTATION

ENTERTAINMENT

10:30pm - 1:00am - HOSPITALITY AREA

Venue: HOTEL CONFERENCE ROOM

Sunday, November 9, 2008

8:30 am - 10:00am - POWER BREAKFAST

11

09-4403 0284

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CN-000133

1202

Theme: - *SPIRITUALITY - THE BASICS IN BUSINESS*
Greetings - *Lowell Hawthorne*
Speakers - *Ed Goldberg*
Selection: - *Local Choir*

October 13, 2008

12

09-4403 0285

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CN-000134

Exhibit 24

Combined Tax Details: 30.80USXT2.50AY7.00XY5.00XA9.35FG30.00FH5.00IWXF4.50EWR4.5 (Agent Use Only)

Additional Thu., Oct. 23, 2008/AMERICAN EXPRESS XXXXXXXXXXXX9426 was charged 15.00 USD

[Redacted line]

From: "Continental Airlines, Inc." <continentalairlines@continental.com>
To: <CARIB-DESK@ATT.NET>
Subject: eTicket Itinerary and Receipt for Confirmation AK13X5
Date: Thursday, October 23, 2008 3:04:07 PM

To ensure delivery of this e-mail please add continentalairlines@continental.com to your address book or approved senders list.

Continental Airlines Confirmation: Print your boarding pass at AK13X5 within 24 hours of your flight
Issue Date: October 23, 2008

Table with columns: Traveler, eTicket Number, Frequent Flyer, Seats. Includes flight information for 06NOV08 and 11NOV08.

FARE INFORMATION table with columns: Fare Breakdown, Airfare, Per Person Total, eTicket Total, Form of Payment, Last Four Digits.

The airfare you paid on this itinerary totals: 318.00 USD
The taxes you paid on this itinerary total: 94.15 USD 09-4403 0287

Fare Rules: Additional charges may apply for changes in addition to any fare rules listed.
NONREF/OVALUAFTDPT/CHGFEE
Cancel reservations before the scheduled departure time or TICKET HAS NO VALUE

Exhibit 25



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of the
General CounselOffice of the
Secretary
Washington, D.C.
20201

June 2, 2000

MEMORANDUM

TO: Deputy Ethics Counselors
National Institutes of Health

FROM: Karen Santoro
Ethics Counsel

SUBJECT: Outside Activities of NIH Employees with Foundations

Recently, a provision of the Internal Revenue Code has been brought to my attention that has serious ramifications for NIH employees who have previously received approval to engage in outside employment activities with private foundations. The statute imposes a tax on "each act of self-dealing between a disqualified person and a private foundation." 26 U.S.C. § 4941(a)(1). This statute, which was enacted in 1969, was intended to curb private foundations' attempts to influence Government officials. The Internal Revenue Service has issued a number of revenue rulings with respect to Government employees and prospective activities with private foundations.

Issue: The Internal Revenue Service imposes an individual penalty tax of up to 200% of the amount of compensation from a private foundation to certain Government officials conducting outside activities with these foundations.

Conclusion: Certain Government officials should refrain from accepting compensation (other than travel expenses within the United States) for outside activities with private foundations.

Discussion: Specifically, the statute imposes a tax on each act of self-dealing by a disqualified individual equal to five percent of the amount involved for each year in the taxable period. 26 U.S.C. § 4941(a)(1) [1]. In any case in which an initial tax is imposed on an act of self-dealing which is not corrected within the taxable period, a tax equal to 200 percent of the amount involved will be imposed on the disqualified person. 26 U.S.C. § 4941(b)(1)[2].

The Code defines "self-dealing" as any direct or indirect agreement by a private foundation to make any payment to certain enumerated government officials. 26 U.S.C. § 4941(d)(1)(F)[3]. Government officials who are "disqualified persons" within the scope of this restriction are elective officials, Presidential appointees, Schedule C employees, and individuals compensated at or above GS-15-7 levels, irrespective of their appointment mechanism (Title 42, SBRs, Commissioned Corps), and personal or executive assistants or secretaries to any of the foregoing. 26 U.S.C. § 4946(c). Excluded from the definition of government employees is a "special governmental employee" as defined in 18 U.S.C. § 202(a)[4]; Treas. Reg. 53.4946-1(g)(1).

Also excluded from the definition of self-dealing are agreements to employ an individual for any period after the termination of his government service if that individual is terminating his government service within a 90 day period. 26 U.S.C. § 4941(d)(1)(F). For purposes of the statute, a "private foundation" has the same meaning as in 26 U.S.C. § 509. A website for obtaining the status of a foundation can be found at http://www.irs.ustreas.gov/bus_info/eo/egsearch.html.

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Government officials who are within the scope of this statute will be required to pay the tax only if the individual participates in the act of self-dealing knowing that it is an act of self-dealing, 26 U.S.C. § 4941 (a)(1). The regulations define "knowing" to include those situations when: the individual has actual knowledge of the facts that such a transaction would be self-dealing; he is aware that the act violates Federal tax law governing self-dealing; and he negligently fails to make reasonable attempts to ascertain whether the act is an act of self-dealing or he is in fact aware that it is in an act of self-dealing. Treas. Reg. § 53.4941 (a)(1)-(b)(3). The burden is thus on the individual to determine whether he or she is liable under the statute.

An individual's participation in an act of self-dealing will not be considered "knowing" if the individual, after full disclosure of the factual situation to legal counsel, relies on the advice of counsel expressed in a "reasoned written legal opinion" that an act is not an act of self-dealing within the meaning of the statute, even if the act is subsequently determined to be self-dealing. Treas. Reg. § 53.4941 (a)(1)-(b)(6).

Finally, a tax for self-dealing will not be imposed under the following circumstances: certain nontaxable prizes and awards if the recipients are selected from the general public; nontaxable scholarships and fellowship grants; qualifying annuity plans; contributions or gifts not exceeding an aggregate of \$25; payments made under the government employee training program in 5 U.S.C. Ch. 41; and payment of travel expenses within the United States. 26 U.S.C. § 4941 (d)(2)(B); Rev. Rul. 131, 1974-2 C.B. 385.

As a result of this statute, NIH employees paid at or above the GS 15-7 level are effectively prohibited from receiving compensation from a private foundation for activities such as teaching, writing, advising, or consulting. The Internal Revenue Service may serve a deficiency notice upon an employee, who would then be forced to pay the tax or contest the assessment.

Effective immediately, all requests for approval of outside activities must be reviewed in accordance with the statutory provision at 26 U.S.C. § 4941. The compensation level of the individual requesting approval must be considered in conjunction with an analysis of the nature of the private entity offering the opportunity for compensation. Previously approved outside activities with foundations for NIH employees who are paid at or above the GS 15-7 level should be reviewed to determine the status of the foundation. Should the status of the foundation be private, any affected employee must be advised to either accept only travel expenses within the United States for his/her service or resign from such service. Employees who have questions whether payment to them by a private foundation constitutes acts of self-dealing should consult private counsel.

For your information, the Foundation for the National Institutes of Health (FNIH) and the Foundation for Advanced Education in the Sciences (FAES) are. For your information, the Foundation for the National Institutes of Health (FNIH) and the Foundation for Advanced Education in the Sciences (FAES) are not considered private foundations for purposes of this prohibition.

The NIH Office of the Legal Advisor has reviewed and concurs in this opinion.

cc: Robert Lanman, Stephen Benowitz

[1] When a tax is imposed on a self-dealer, a corresponding tax of 2.5 percent is imposed on any foundation manager unless the participation by the foundation manager is not willful and is due to reasonable care. 26 U.S.C. § 4941(a)(2). A maximum tax of \$10,000 may be imposed. 26 U.S.C. § 4941 (c) (2).

[2] The "taxable period" is defined as the period beginning with the date on which the act of self-dealing occurs, and ending on the earliest of: the date that a deficiency notice is mailed by the I.R.S.; the date on which the tax is assessed; or the date on which the correction of the act of self-dealing is completed. 26 U.S.C. § 4941 (e). Treas. Reg. § 53.4941 (e) -1 (a) (1). As with the initial tax, a corresponding additional tax of 50 percent will be imposed on any foundation manager who refuses to agree to the correction. 26 U.S.C. § 4941 (b) (2). As with the initial tax, the penalty on a foundation manager is limited to \$10,000. 26 U.S.C. § 4941 (c) (2)

[3] The statute also defines "self-dealing" to include: the sale or exchange, or leasing, of property; the lending of money or other extension of credit; the furnishing of goods, services, or facilities; payments to a disqualified person as defined in 26 U.S.C. § 4946 (a) (such as substantial contributors, foundation managers, holders of 20 percent of the voting power or beneficial interests; family members of disqualified individuals, or a corporation, partnership, or trust holding a 35 percent interest); and transfer to or use by a disqualified person of the foundation's income or assets. 26 U.S.C. § 4941 (d).

[4] 18 U.S.C. § 202 (a) defines "special Government employee" as temporary employee appointed for a term not to exceed 130 days, a part-time U.S. commissioner or magistrate, a part-time member of Congress, or a Reserve or National Guard officer.

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Congress of the United States
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October 21, 2009

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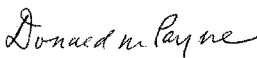
Dear Mr. Chisam,

I have received your letter dated October 5, 2009 regarding the referral you received from the Office of Congressional Ethics (OCE). I appreciate the opportunity to respond to the OCE's report.

In reading their report, I note that no mention was made of the fact that I responded in writing to the allegations the OCE raised. Therefore, I am enclosing a copy of the letter I provided to them in May. I have no objection to all of my response being released to the public.

Please feel free to contact me if you need any additional information.

Respectfully,


Donald M. Payne
Member of Congress

RECEIVED
2009 OCT 21 PM 4:56
COMMITTEE ON STANDARDS

1210

DONALD M. PAYNE
10TH DISTRICT, NEW JERSEY

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May 22, 2009

Members of the Board
Office of Congressional Ethics
U.S. House of Representatives
1017 Longworth House Office Building
Washington, D.C. 20515

Dear Members of the Board,

I had hoped to have the opportunity to address the Board in person, so that I could meet with you face-to-face to answer any questions you might have regarding the pending case. Unfortunately, I recently learned that the meeting had been scheduled during the Congressional recess when the House of Representatives is not in session and members are out of town. Because of the late notice, I was unable to change long-standing commitments outside of Washington. Therefore, I have no option but to communicate with you in writing.

I would like to address the allegations which have been raised regarding the U.S. Congressional and Business Delegation to the Caribbean Region conference. As a co-founder in 2003 of the bipartisan Congressional Caribbean Caucus, and as a co-chair along with my colleague Dan Burton of Indiana, I am strongly committed to strengthening the bonds between the U.S. and the Caribbean. With the Caribbean region's strategic location adjacent to the United States of America, it has become known as our "third border" in recognition of our important partnership on trade, health, education and homeland security issues.

For a number of years, the Carib News Foundation has worked closely with the House Committee on Standards of Official Conduct (Ethics Committee) to comply with House rules governing members' travel in preparation for the organization's annual conference. As required by law, I submitted the proper forms required of members of Congress both in advance and after returning from the conference. I received an official letter from the Committee approving my attendance at the conference.

Let me stress that I had no doubt that the exclusive sponsor of the trip was the Carib News Foundation, as it has been in the past. During an event at the conference, I was asked to thank those who provide support to the foundation. As you know, this is customary at events given by foundations and non-profits, many of whom list their corporate sponsors on their web sites. Organizations from Presidential Libraries to the American Red Cross to the Aspen Institute give public recognition to their sponsors. It was my intent merely to thank businesses for their support of the foundation, not for any connection that they may have had with this specific conference.

To imply that I have somehow been improperly influenced by businesses who contribute to the foundation is completely false. I hope that members of the Board will reject this allegation as unfounded and frivolous. Thank you for allowing me the opportunity to respond.

Respectfully,



Donald M. Payne
Member of Congress

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FOR CONTINUATION OF HOUSE REPORT 111-422

**IN THE MATTER OF THE INVESTIGATION INTO
OFFICIALLY CONNECTED TRAVEL OF HOUSE
MEMBERS TO ATTEND THE CARIB NEWS
FOUNDATION MULTINATIONAL BUSINESS
CONFERENCES IN 2007 AND 2008**

SEE BOOK 2