OFFICE OF CONGRESSIONAL ETHICS UNITED STATES HOUSE OF REPRESENTATIVES

Report and Findings

Transmitted to the
Committee on Standards of Official Conduct
on June 8, 2009
and released publicly pursuant to H. Res. 895 of the
110th Congress as amended



June 2009

House of Representatives Office of Congressional Ethics Review No. 09-6333

REVIEW No. 09–6333

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OFFICE OF

CONGRESSIONAL ETHICS

BOARD

United States House of Representatives One Hundred Eleventh Congress

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Leo J. Wise, Chief Counsel & Staff Director Omar Ashmawy, Investigative Counsel Elizabeth Horton, Investigative Counsel

REPORT

Review No. 09-6333

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 Charles Rangel

NATURE OF THE ALLEGED VIOLATION: There is substantial reason to believe that Congressman Charles Rangel's participation in the 13th Annual Caribbean Multi-National Business Conference in St. Maarten, N.A. from November 7-9, 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 Rangel.

VÖTES 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. 09-6333

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. Congressman Charles Rangel attended the 13th Annual Caribbean Multi-National Business Conference in St. Maarten, N.A., from November 6–9, 2008. Congressman Rangel received funds from a private source to participate in the conference.

A. SUMMARY OF ALLEGATIONS

- 2. There is substantial reason to believe that Congressman Rangel 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 Rangel 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 Rangel'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 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 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 Congressman Rangel 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 Rangel 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 Rangel 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 three 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 Rangel and (4) whether, because of its tax status, the Carib News Foundation could lawfully pay for Congressman Rangel's conference-related expenses.

7. While all these topics are relevant, the Board notes that they do not all involve conduct by Congressman Rangel to the same de-

gree.

a. As to topic 1, determining the identity of the true sponsor or sponsors implicates the conduct of both Congressman Rangel and the Standards Committee. Congressman Rangel told the OCE he saw no evidence of corporate sponsorship at the conference. However, the evidence strongly suggests the Member's statement is not credible. Once Congressman Rangel arrived at the conference, he was almost certainly confronted with information that other corporations were co-sponsors. As such, he had a responsibility to inform the Standards Committee as 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 Rangel. 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 Congressman Rangel provided as to the value of the reimbursement of his conference-related expenses most directly implicates his 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." Congressman Rangel stated that while he certified the information on the post-travel disclosure form, he was unaware of the accuracy of the information he certified.

d. As to topic 4, limitations on Carib News Foundation's ability to pay for overseas travel of government officials, Congressman Rangel 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 re-

ferral.

C. JURISDICTIONAL STATEMENT

8. The allegations that are the subject of this review concern Representative Charles Rangel, a Member of the United States House of Representatives from the 15th District of New York. 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

9. The OCE received a written request for a preliminary review in this matter signed by at least two members of the Board on March 6, 2009. The preliminary review commenced on this date.² The preliminary review was scheduled to end on April 5, 2009.

10. At least three members of the Board voted to initiate a second-phase review in this matter on March 27, 2009. The second-phase review commenced on April 6, 2009.³ The second-phase review was scheduled to end on May 21, 2009.

11. The Board voted to extend the 45-day second-phase review by an additional 14 days, as provided for under the Resolution, on

¹House Resolution 895 of the 110th Congress, Section 1(e).

²A preliminary review is "requested" in writing by members of the Board of the OCE. The request for a preliminary review is "received" by the OCE on a date certain. According to H. Res. 895 of the 110th Congress (hereafter "the Resolution"), the timeframe for conducting a preliminary review is 30 days from the date of receipt of the Board's request.

³ According to the Resolution, the Board must vote on whether to conduct a second-phase re-

³ According to the Resolution, the Board must vote on whether to conduct a second-phase review in a matter before the expiration of the 30-day preliminary review. If the Board votes for a second-phase, the second-phase begins when the preliminary review ends. The second-phase review does not begin on the date of the Board vote.

April 24, 2009. Following the extension, the second-phase review was scheduled to end on June 5, 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;
 - (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 NEWS-PAPER), THE GOVERNMENT OF ST. MAARTEN AND SEVERAL CORPORATIONS, SPONSORED REPRESENTATIVE RANGEL'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 $5(h)(i)(1)(B)^4$ 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 Congressman Rangel 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 Rangel 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 Rangel's travel according to House travel rules because these corporations had donated funds specifically for the conference (i.e. earmarked funds).

 $^{^4\}text{House}$ 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.

A. REPRESENTATIVE RANGEL'S KNOWLEDGE OF THE INVOLVEMENT OF THESE CORPORATIONS IN THE CONFERENCE

17. On his Member Post-Travel Disclosure Form, Congressman Rangel 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" ⁵) in November 2008.⁶

18 18 18 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	✓ Original Amendment
THE AFIVE RESOURCE CEUS. House of Rep	presentatives
2009 NOV 24 PM 3: 05 110" Con	
This form is for disclosing the receipt of travel expenses from	
fact-finding trips or similar events in connection with official political travel on this form, or travel that is unrelated to off report all privately-funded travel on the Member or officer's with clause 5 of House Rule 25, complete this form and file it Cannon House Office Building, within 15 days after travel is to the public as soon as possible after they are received.	I duties. You need not disclose government-funded or icial duties. This form does not eliminate the need to annual Financial Disclosure Statement. In accordance with the Clerk of the House of Representatives, B-106
Name of Traveler: Representative Charles B. Rang	gel
2. a. Name of Accompanying Family Member (if any)	: N/A
b. Relationship to Member/Officer: Spouse	Child Other (specify):
3. a. Date of Departure and Date of Return: 11/7/08	- 11/9/08
b. Dates at personal expense (if any): N/A	A Company of the Comp
4. Itinerary (cities of departure – destination – return):	NY (JFK) - St. Maarten - NY (JFK)
5. Sponsor(s) (who paid for the trip): Carib News Fou	indation

18. Congressman Rangel certified that this information was "true, correct and complete" to the "best of [his] knowledge." ⁷

⁶Member/Officer Post-Travel Disclosure Form signed by Representative Charles B. Range (Nov. 24, 2008) (Exhibit 1 at 09–6333 0002–0003).
⁷Id. at 09–6333 0003.

⁵The "Member/Officer Post-Travel Disclosure Form" asks the filer at question 5, "Sponsor(s) (who paid for the trip)." This in turn raises two questions: (1) what is a trip and; (2) 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, "[tlhis 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 participating in the conference. The Board also notes that the Standards Committee treated the conference as the "trip" in its letter of October 23, 2008 pre-approving Congressman Rangel's trip.

⁶ Member/Officer Post-Travel Disclosure Form signed by Representative Charles B. Rangel

I certify that the information contained in this form is knowledge. I have determined that all of the expenses is	sted above were necessary and that the travel was
in connection with my duties as a Membar or officer of create the appearance that I am using public fiftee for or SIGNATURE OF MEMBER:	the U.S. Flouse of Representatives and would not ivate gain
	DATE: [1-21-08
Version date 9/2008 by Committee on Standards of Official Conduct	

19. In an interview with the OCE, Congressman Rangel confirmed he signed this document.8

20. Prior to the conference, Karl Rodney, the CEO of the Carib News Foundation, submitted a Private Sponsor Travel Certification Form to Congressman Rangel, which he in turn submitted to the Standards Committee that identified the Carib News Foundation as the sponsor of the trip.9

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

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." 10

- 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):
- 22. Rodney also certified that the information was "true, complete, and correct." 11

22	Toostifu that the i	nformation contained in this form is true,	amplete and assess to the heat of mu	len avula das
43.	I ceruly that the i	north and contained in this form is true, t	complete, and correct to the best of thy	knowledge.
	Signature:	12 Sola		
	Name and title:	KARL B. RODNEY, CEO		

⁸ Memorandum of Interview of Representative Charles Rangel (May 28, 2009) (Exhibit 2 at

<sup>09–6333 0020).

9</sup> Private Sponsor Travel Certification Form signed by Karl A. Rodney (Oct. 3, 2008) (Exhibit 1 at 09–6333 0004).

¹⁰ Id. at 09–6333 0005.

¹¹Id. at 09-6333 0006.

23. Also prior to the conference, the Standards Committee approved the reimbursement of Congressman Payne's expenses by the Carib News Foundation. 12

U.S. House of Representatives

COMMITTEE ON STANDARDS OF OFFICIAL CONDUCT

Washington, DC 20515

October 23, 2008

The Honorable Charles B. Rangel U.S. House of Representatives 2354 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 9, 2008 sponsored by the Carib News Foundation.

24. At the conference, several corporations, including Citibank, IBM, AT&T, and others, were identified as "sponsors." 13

25. The signs for the conference displayed these corporations' logos, including signs hung behind the speaker's podium. 14 Congressman Rangel arrived at the conference on Friday and left on Sunday. According to his interview with OCE, Congressman Rangel did not attend any of the sessions he did not participate inwith one exception. However, he did attend all the conference meals. 15 In total, Congressman Rangel would have attended approximately 6 or 7 sessions and/or meals. According to Delegate Christensen, the signs containing the corporate logos were in every room used by the conference. 16 It is therefore likely Congressman Rangel was exposed to the signs bearing the corporate logos.

¹²Letter from the Committee on Standards of Official Conduct to Representative Charles B.

Rangel (Oct. 23, 2008) (Exhibit 1 at 09–6333 0016–0017). $^{13}\,\mathrm{Photographs}$ taken at the 13th Annual Caribbean Multi-National Business Conference (Exhibit 5 at 09–6333 0058–0068) (The Board notes that the source of this information may have a bias, interest, or motive in this matter.).

 $^{^{15}\}mathrm{Memorandum}$ of Interview of Representative Charles Rangel (May 28, 2009) (Exhibit 2 at

¹⁶Memorandum of Interview of Delegate Donna Christensen (May 4, 2009) (Exhibit 26 at 09-



26. Despite the likelihood that Representative Rangel was exposed to signs bearing corporate logos, in an interview with the OCE, Congressman Rangel stated that he did not see any such signs. He stated that he did not remember any corporations identified as sponsors. While admitting that his lack of memory on this matter was a problem, he nevertheless was unequivocal that he did not see indications that business had sponsored the conference. 17 His statements on this point are not credible and conflict with the statements of other Members of Congress who attended, and the pictorial evidence collected by OCE.

27. Despite his statement that he has no memory of them, these corporate entities, as described below, were in fact sponsors of the

conference.

B. CARIB NEWS ALSO SPONSORED CONGRESSMAN RANGEL'S TRAVEL

28. 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. 18

29. 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." ¹⁹

30. Therefore, CARIB NEWS was also effectively a sponsor of Congressman Rangel's trip.

C. CORPORATE DONATIONS WERE EARMARKED FOR THE CONFERENCE

31. 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 trav-

¹⁷Memorandum of Interview of Representative Charles Rangel (May 28, 2009) (Exhibit 2 at 09-6333 0021).

18 Private Sponsor Travel Certification Form signed by Karl A. Rodney (Oct. 3, 2008) (Exhibit

¹ at 09-6333 0006).

19 Letter from Joel Cohen, Counsel for Karl Rodney (May 18, 2009) (Exhibit 6 at 09-6333

el 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.

32. 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.²⁰

²⁰ Letter from Carib News Foundation to Mr. Eric Eve, Citigroup, Inc. (Apr. 4, 2008) (Exhibit 7 at 09–6333 0073) (a nearly identical letter was sent to IBM, AT&T, Pfizer, Verizon Foundation and others).



Carib News Foundation

7 West 36th Street, 8th floor, New York, NY 10018

Tel: (212) 944-2089

E-mail: @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

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.

33. Attached to this solicitation letter was a PowerPoint presentation.²¹ 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.²² In each instance, the

²¹Id. at 09-6333 0075-0090.

²²Id. at 09-6333 0083-0086.

sponsorship covers travel related expenses such as gala events and meals.

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

ARTICIPA

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

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

34. 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 2005.²³ On its 2005 form 990-PF, the Carib News Foundation is shown as having no assets, no income and no expenses.²⁴ 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.²⁵

 $^{^{23}}$ Letter from IRS to OCE (April 17, 2009) (Exhibit 8 at 09–6333 0095). $^{24} Id.$ at 09–6333 0096–0107.

²⁵ Memorandum of Interview of Representative of IBM (May 8, 2009) (Exhibit 9 at 09–6333

35. Citigroup. Citigroup made a \$75,000 payment to the CARIB NEWS for the conference. 26

36. **Verizon Foundation.** Verizon Foundation made a \$35,000 payment to the Carib News Charities ²⁷ for the conference.²⁸

Susan A, Sullivan Verizon Foundation Director -- Strategic Planning & Partnerships



Verizon Foundation One Verizon Way Bldg 6, 3rd Fir 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.

37. 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.²⁹

38. **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.³⁰

²⁶ Documents submitted to the OCE by Citigroup (Exhibit 7 at 09–6333 0072).

²⁷Mr. 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.

 ²⁸ Documents Submitted to the OCE by Verizon Foundation (Exhibit 10 at 09–6333 0117).
 ²⁹ Memorandum of Interview of Representative 1 of Verizon Foundation (Mar. 23, 2009) (Exhibit 11 at 09–6333 0122).

³⁰ Documents submitted by IBM to the OCE (Exhibit 13 at 09–6333 0140).

CARIB NEWS INC.	1	nvoice
7 WEST 36TH STREET 8TH FLOOR NEW YORK, 10018 212-944-	Date 7/16/2008	Invoice # 45122
Bill To Wanda McKenzie IBM 2607 Jesters Court Marietta, GA 30068		
Description	Amou	
Sponsorship Multi-National Business Conference 2008 TAX ID 13-362060		20,000.00

- 39. Macy's. Macy's made a \$35,000 payment to CARIB NEWS for the conference.³¹
- 40. Pfizer. Pfizer made a \$25,000 payment to CARIB NEWS for the conference.32
- 41. 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.³³ 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 SPON-SORED THE EVENT, CONGRESSMAN RANGEL'S INVOLVEMENT SHOULD HAVE BEEN LIMITED TO ONE DAY
 - 42. 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 at-

 $^{^{31}}$ Memorandum of Interview of Representative 1 of Macy's (Exhibit 20 at 09–6333 0232). 32 Interview with Investigative Counsel on May 22, 2009. 33 Documents submitted by American Airlines to the OCE (Exhibit 14 at 09–6333 0142) and OCE (Exhibit 14 at 09– 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 \$6.00 and \$6.7500. was between \$6,200 and \$7,500).

tend 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 officiallyconnected 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.34

43. Citigroup, IBM and Verizon employ or retain lobbyists.³⁵

44. Congressman Rangel spent four days at the conference at the

expense of the third-party.³⁶

- 45. There is substantial reason to believe that Congressman Rangel 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 PLAN-NING, ORGANIZING AND CONDUCTING THE 2008 CONFERENCE
- 46. The Government of St. Maarten was the host of the 2008 conference.
- 47. In that capacity, the Government of St. Maarten provided inkind 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.³⁷
- 48. 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." 38 These included:

³⁶Member/Officer Post-Travel Disclosure Form signed by Representative Charles B. Rangel (Nov. 24, 2008) (Exhibit 1 at 09-6333 0002-0003).

³⁸ Letter from Karl Rodney to Commissioner Sarah Wescott-Williams (Aug. 13, 2008) (Exhibit

 $^{^{34}\,\}text{House}$ Ethics Manual at 92–93 (citing House Rule 25, clause 5(b)(1)(C)) (emphasis in original cities of the contraction of the contract

nal)). $\,^{35}\mathrm{Clerk}$ of the House of Representatives Lobbying Disclosure Report 2008 (excerpt) (Exhibit 15 09-6333 0148-0153).

 $^{^{37}}$ 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 was the Government which would have been reportable under the Foreign Gift and Decorations Act. In addition, if the Government was the Government was the Government was a 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 was the Government was the Government was a 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 was the Go ment 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

- 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
 - 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 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.

49. 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.³⁹ These contributions to the conference were all inkind, according to Mr. Rodney, and he did not provide an estimated value for them.⁴⁰

50. 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.⁴¹

 $^{^{39}\}mathrm{Letter}$ from Joel Cohen, Counsel for Karl Rodney (May 18, 2009) (Exhibit 6 at 09–6333 0068–0069).

⁴⁰*Id*. ⁴¹5 U.S.C. § 7342.

- 51. Representative Rangel told the OCE that he was unaware of what role the Government of St. Maarten played in the conference. He only knew that they provided protection for him—to include the use of a car and a police escort while he attended the conference.⁴²
- III. Role of the Chair's Counsel in the Approval of the 12th Annual Caribbean Multi-National Business Conference in 2007
- 52. Congressman Rangel told the OCE that he relied on the Standards Committee to determine if he could attend the conference. 43 He also stated that he believed the Carib News Foundation was the conference and that the foundation put the program together and invited him to attend.44 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.
- 53. The Board requested that the Committee provide the information submitted to it for 2008 and the Committee declined to do
- 54. 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.⁴⁵ 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.

55. 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 re-

viewed the trip in 2007.

56. 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

⁴²Memorandum of Interview of Representative Charles Rangel (May 28, 2009) (Exhibit 2 at

⁴³ Id. at 09-6333 0022. 44 Id. at 09-6333 0021.

⁴⁵ House Ethics Manual (2008) at 92–93 (citing House Rule 25, clause 5(b)(1)(C)).

Executive Assistant at CARIB NEWS, to Dawn Kelly Mobley, Counsel to the then-Chair of the Ethics Committee.⁴⁶

- 57. The next day, on September 18, 2007, Ms. Mobley responded and asked for "any information on your sponsor's status." ⁴⁷
- 58. That same day Ms. Louis responded, indentifying multiple corporations as "sponsors" of the trip. 48

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

59. In response that same day, Ms. Mobley asked, "[d]o any of these organizations have or retain a lobbyist" ⁴⁹

60. 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. 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. 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.

⁴⁷E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 18, 2007, 12:57 PM EST) (Exhibit 17 at 09–6333 0204).

 $^{^{46}\}rm{E}\text{-}mail$ from Patricia Louis to Dawn Kelly Mobley (Sept. 17, 2007, 3:47 PM EST) (Exhibit 17 at 09–6333 0204) (The Board elected not the 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.).

⁴⁸E-mail from Patricia Louis to Dawn Kelly Mobley (Sept. 18, 2007) (Exhibit 17 at 09–6333 0204) (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)

⁴⁹ E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 18, 2007, 7:03 PM EST) (Exhibit 17 at 09, 6333 0203)

¹⁷ at 09-6333 0203).

50 E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 19, 2007, 2:16 PM EST) (Exhibit 17 at 09-6333 0203).

⁵¹ House Ethics Manual (2008) at 97–98.

From: Kelly Mobley, Dawn

Sent: Wednesday, September 19, 2007 2:16 PM

Subject: RE: Draft Program - 2007Business Conference (No agenda or program attached)

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 and organizing the tip? All to assume the Salab Nation in 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 roview.

Dawn Kelly Mobley Ethics Counsel for Gongresswoman Stephanie Tubbs Jones Chairwoman, Committee on Standards of Official Conduct U.S. of Representatives. Washington, DC 20515 202/226

61. 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.⁵²

Kelly Mobley, Dawn [Dawn.KellyMobley@mall.house.gov] From:

Sent: Wednesday, September 19, 2007 3;23 PM

Subject: RE: Draft Program - 2007Business Conference (No agenda or program átlached)

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 lot the Congresswomen know we are awaiting your sponsor form. Just as you do, they would also like assurance. Thank you.

62. On September 21, 2007, Ms. Louis responded.⁵³

⁵²E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 19, 2007, 3:23 PM EST) (Exhibit 17 at 09-6333 0203)

⁵³ E-mail from Patricia Louis to Dawn Kelly Mobley (Sept. 21, 2007, 1:56 PM EST) (Exhibit 17 at 09-6333 0201).

Registration

From: plouis @nycaribnews.com)
Sent: Friday, September 21, 2007 1:66 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 691C3 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, adjusting 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

63. 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 1.54

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 stibuil this form to each House trivitee at least 30 days before I avel it 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 automission of an incomplete form will dela the review process. Before completing this form, sponsors are urged to carefully review the Committee's private ravel guidelines and advisory memorands 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

64. However, the Carib News Foundation listed a number of corporations as private sponsors, each with responsibility for planning and conducting the trip, in question 12.⁵⁵ This is at least the second instance where the Carib News Foundation identified these corporations as the trip's sponsors.

 $^{^{54}}$ Private Sponsor Travel Certification Form (Sept. 21, 2007) (Exhibit 17 at 09–6333 0191). $^{55}\,Id.$

12. Private sponsors must have a direct and immediate relationship to the purpose of the hip or location being visited. Describe the role of each sponsor in organizing and conducting the trip: Pilzer-Education-leath AT&T and IBM - provide technology to the region. MACY's - cooks new vender sources, Citibank- opportunities in the region.

65. This prompted the following e-mail from Ms. Mobley to Ms. Louis.⁵⁶ The Board notes that Ms. Mobley stated she was "working through" the Carib News Foundation's forms "before leaving them with our staff attorney.

From: Kelly Mobley, Dawn Sent: Tuesday, September 25, 2007, 12:42 PM To: 'plouis' Subject: Query

iam 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?

66. Later that same day, Ms. Mobley queried further.⁵⁷ 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."

Fronj: Kelly Mobley, Dawn Senti 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 torwarded you on this matter.

67. On October 3, 2007, Ms. Mobley informed Ms. Louis that Susan Olson was the staff attorney assigned to review the trip.⁵⁸ 68. 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 12.59

- 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 Pilzer-Education/teath AT&T and IBM - provide technology to the region. MACY's - cooks new vender sources, Citibank- opportunities in the region.
- 69. However, as of October 5, 2007, it provided a different answer to question 12.60
- 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)

And the attached sheet provided the following information.⁶¹

 $^{^{56}\,\}mathrm{E\text{-}mail}$ from Dawn Kelly Mobley to Patricia Louis (Sept. 25, 2007, 12:42 PM EST) (Exhibit 17 at 09-6333 0188).

⁵⁷ E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 25, 2007, 5:08 PM EST) (Exhibit

¹⁷ at 09–6333 0188).

⁵⁸ E-mail from Dawn Kelly Mobley to Patricia Louis (Oct. 3, 2007, 12:39 PM EST) (Exhibit

E-mail from Dawn Keny Mooley to Factor 2533 (12.7)
 17 at 09-6333 0185).
 Private Sponsor Travel Certification Form (Sept. 21, 2007) (Exhibit 17 at 09-6333 0192).
 Private Sponsor Travel Certification Form (Oct. 5, 2007) (Exhibit 18 at 09-6333 0207).
 Id. at 09-6333 0211

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.

On October 10, 2007, Susan Olson, the staff attorney on the Standards Committee assigned to review the trip e-mailed Ms. Louis the following questions ⁶² (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.

----Original Message

From: Olson, Susan [mailto:Susan Olson@mail.house.gov]

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

To: @nycaribnews.com

Cc: Dawn.KellyMobley@mail.house.gov; O'Rellly, 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

 $^{^{62}\,\}mathrm{E\text{-}mail}$ from Susan Olson to Patricia Louis (Oct. 10, 2007, 4:01 PM EST) (Exhibit 17 at 09–6333 0174).

(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 t(lp, the draft schedule, however, indicates that the following entitles are "sponsoring" sessions, events, etc. during this trip:

o Antigua Government

- Sandals
- Royal Carlbbean Bakery Ģ
- CITI Ö.
- Pfizer o
- Macy's
- AT&T
- HSBC Ó.
- ö lВM
- Goodworks International
- Preferred Health Partners. o
- Antigua & Barbuda
- American Airlines
- Golden Krust

Last year the Foundation provided the following information regarding these "additional sponsors" for the November 9 to 12, 2005 trip;

The Foundation, which is a 501(o)(3) inopprofit 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 appropriate provided a contribution to the exercisional discountering contribution to 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 2008 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 Antiqua trip.

Susan L. Olson

House Committee on Standards of Official Conduct

70. 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.63 The "Advisory Opinion" did not conclude that these entities were, in fact, the trip's sponsors, as the e-mail seems to indicate.

71. A draft agenda for the conference dated October 3, 2007, identified a "sponsor" for each event listed.⁶⁴ 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." 65

Moderator :	PORT & AIRPORT SECURITY - THE MANDATES Lance Ogiste Hon. Bennie Thompson
AND SERVICE SERVICE	Dr. Basil Wilson
Sponsor	Preferred Health Partners

And Citi is identified as the sponsor of this event on "Community Outreach—Education—Access and Collaboration." 66

⁶³Committee on Standards of Official Conduct, Advisory Opinion (Oct. 27, 2006) (Exhibit 17

at 09–6333 0197–0199).

64 Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 3, 2007) (Exhibit 19 at 09–6333 0213–0229).

⁶⁵ *Id.* at 09–6333 0219 $^{66}Id.$ at 09–6333 0225

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

72. 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.⁶⁷

From: plouis — Quycaribnews.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

⁶⁷ E-mail from Patricia Louis to Dawn Kelly Mobley, George Dalley, and Shelley Thomas (Oct. 10, 2007, 5:56 PM EST) (Exhibit 17 at 09–6333 0177).

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.⁶⁸

73. Less than an hour later Ms. Mobley responded.⁶⁹ 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

Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]

Wednesday, October 10, 2007 6:49 PM Sent:

To: @nycaribnews.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 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

74. Ms. Louis then faxed Ms. Mobley. 70 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.").

⁶⁸Memorandum 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).

69 E-mail from Dawn Kelly Mobley to Patricia Louis (Oct. 10, 2007, 6:49 PM EST) (Exhibit

⁷⁰Fax from Patricia Louis to Dawn Kelly Mobley (Oct. 11, 2007) (Exhibit 17 at 09-6333 0176).



TEL; (212) 944- ; FAX; (212) 944-2089 E-MAIL ADDRESS; @AOL.COM;

TO: Dawn Kelly Mobley	FROM: P. Louis
COMPANY: Ethics Counsel for Co Tubbs Jones	
FAX NUMBER, 202-225-7392	total no of pages including cover
RE: Travel Form	

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 spousors or co-spousors 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.

75. 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 Member of Congress who attended the conference.⁷¹ 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."

 $^{^{71} \}mbox{Working Draft}$ of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 22, 2007) (Exhibit 21 at 09–6333 0235–0246).

19/24/2097 19:00 2129442889

wormers onert some

12th Annual Caribbean Multi-National Business Conference Program. Antigua & Barbuda

76. This event was previously identified in the earlier draft as being "sponsored" by Preferred Health Partners. 72 Now it identifies them as merely a "participant." 73

PORT & AIRPORT SECURITY - THE MANDATES

Mr. Lance Ogiste Moderator:

Hon. Bennie Thompson

Hon. Dwer Astaphan

Venue Sandals Grande

Participant Preferred Health Pariners

77. In another example, the Board notes that the following event was previously identified as being sponsored by CITI.⁷⁴ Now CITI is not even mentioned.⁷⁵ Michael Flanigan, the moderator, was an executive at CITI at the time and represented the company at the conference.⁷⁶

⁷² Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program

⁽Oct. 3, 2007) (Exhibit 19 at 09–6333 0219).

73 Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 22, 2007) (Exhibit 21at 09–6333 0239).

74 Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program

⁽Oct. 3, 2007) (Exhibit 19 at 09–6333 0225).

75 Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 22, 2007) (Exhibit 21 at 09–6333 0245).

⁷⁶ Memorandum of Interview of Representative of Citi (Mar. 17, 2009) (Exhibit 4 at 09–6333 0053).

5:00pm - 6:50pm - COMMUNITY OUTREACH
EDUCATION & YOUTH DIRECTION - ACCESS AND COLLABORATION

Venue: - Multipurpose Cultural & Exhibition Centre

Moderator: - Michael Flanigan

Speakers: - Dr. Edison Jackson - President Medgar Hvens College

Hoz. David M. Dinkins - Former Mayor New York City

Hon. Eddie Bernice Johnson - Mertiber of Congress

Hon. Bertrand Joseph:

78. These changes were entirely cosmetic. There is no indication that the corporations' substantive role in the conference changed in any way.

79. 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." ⁷⁷ The Board notes that this is precisely the answer she had pre-cleared with Mobley.

From: plouis [mailto: @nycaribnews.com] Senta Thursday, October 11, 2007 10:33 AM Subject: RE: Carlb 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 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

80. 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.⁷⁸ Based on this email, it appears that Ms. Olson was unaware that Mobley had been

⁷⁷ E-mail from Patricia Louis to Susan Olson (Oct. 10, 2007, 10:33 AM EST) (Exhibit 17 at 09–6333 0173).

<sup>09–6333 0173).

78</sup> E-mail from Susan Olson to Bill O'Reilly and Dawn Kelly Mobley (Oct. 12, 2007 9:29 AM) (Exhibit 17 at 09–6333 0172).

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.⁷⁹

From: Olson, Susan Sent: Friday, Öctober 12, 2007 9:29 AM To: O'Reilly, Billi; 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 entitles are cosponsors 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

81. Ms. Mobley then forwarded Ms. Olson's internal e-mail to Ms. Louis.⁸⁰ 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: '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).

82. Later that day, Ms. Mobley sent Ms. Louis an additional email.⁸¹ 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.

⁷⁹Memorandum 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).

of Interview of Representative 1 of Macy's (May 28, 2009) (Exhibit 20).

80 E-mail from Dawn Kelly Mobley to Patricia Louis (Oct. 12, 2007 9:59 AM EST) (Exhibit 17 at 09–6333 0172).

 $^{^{81}\,\}mathrm{E}$ -mail from Dawn Kelly Mobley to Patricia Louis (Oct. 12, 2007 1:55 PM EST) (Exhibit 17 at 09–6333 0172).

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.

83. Ms. Olson then sent Ms. Louis additional questions about the corporate entities previously identified as "sponsors." 82

From: Olson, Susan Sent: Friday, October 12, 2007 2:41 PM Sense (Prop.)
To: plouls
Co: Kelly Hobley, Dawn; O'Relliy, 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 2 Antigua Government o Sandals Royal Caribbean Bakery 0 Goodworks International CITI o Preferred Health Partners o Pfizer o Antigua & Barbuda Macy's 0 American Airlines 0 AT&T Golden Krust 0 HSBC Ö IBM Susan L. Olson Counsel House Committee on Standards of Official Conduct

84. Three days later, Ms. Louis sent an e-mail to Ms. Mobley, but addressed to Ms. Olson.⁸³ 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.

 $^{^{82}\,\}mathrm{E}\text{-mail}$ from Susan Olson to Patricia Louis (Oct. 12, 2007 2:41 PM EST) (Exhibit 17 at 09–6333 0167–0168).

 $^{^{83}\,\}mathrm{E}$ -mail from Patricia Louis to Dawn Kelly Mobley (Oct. 15, 2007 11:00 AM EST) (Exhibit 17 at 09–6333 0167).

@nycaribnews.com] From: plouis [Monday, October 15, 2007 11:00 AM Sent:

'Kelly Mobley, Dawn' To:

Subject: RE: Carlb 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

85. In an interview with the OCE, a staff member of Representative 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.84 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 2007.85 The staff member told the OCE that Congressman Rangel told him that the then-Chair had made similar statements to him.86

86. The staff member 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.⁸⁷ It was the staff member's understanding that if this was done, then Members of Congress could participate in the conference without any restrictions imposed by the new rules. The staff member 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. The staff member 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.⁸⁸

87. 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 con-

⁸⁴ Memorandum of Interview of Staff Member 1 of Congressman Rangel's Office (May 27-28, 2009) (Exhibit 22 at 09–6333 0249). 85 Id. at 09–6333 0250.

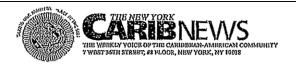
⁸⁶ Id. at 0250. 87 Id. at 0249.

stituted 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.

88. 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.

89. 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, under the terms of the that resolution, the OCE does not have jurisdiction to open a preliminary review into Ms. Mobley's conduct.

 $^{^{89}\,\}mathrm{Fax}$ from Patricia Louis to Dawn Kelly Mobley (Aug. 20, 2008) (Exhibit 23 at 09–6333 0255).



TBL: (212) 944-; FAX; (212) 944-2089 E-MAIL ADDRESS: @AOL,COM;

PACSIMILE TRANSMITTAL SHEET TO: PROM Kelly Mobley Patricia Louis COMPANY: DATE: Committee on Standards of 8/20/08 official conduct FAX NUMBER TOTAL NO. OF PAGES INCLUDING COVER. 202-225-7392 RE: 2008 MULTINATIONAL BUSINESS CONFERENCE DPLBASE COMMENT DPLBASE REPLY DYOUR INFORMATION Ungent | I for review 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. Maatten. Regards

IV. THE VALUE OF THE TRIP REPORTED ON THE MEMBER'S POST-TRAVEL DISCLOSURE FORM

90. 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 preand 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."

91. 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)

92. There is substantial reason to believe that Congressman Rangel 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.

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.

A. REPRESENTATIONS FROM CARIB NEWS FOUNDATION

93. 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.

В	☐ actual amounts ☐ 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
L	AND THE PERSON NAMED IN	The decision of the National Activities		
		Other Expenses (dollar grount)	Identify Specific Nature of taxi, parking, registration	
	For each Member, Officer, or employee	\$150 \$ 25	Conference Registration	
	For each accompanying family member			
L				-
S	ecurity costs, interpreter f	ees, visa application fees, a se of the trip (signify "yes"	Il expenses for the trip, such and similar expenses, will be by checking box):	e for actual costs incurred
	certify that the unor water		1	
. I	Signature:	0000	the name of the same of the sa	

94. 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.

95. 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.

96. 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

^{9&}lt;sup>1</sup>Private Sponsor Travel Certification Form signed by Karl Rodney (Oct. 3, 2008) (Exhibit 1 at 09–6333 0004–0013).

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
- 97. On his Member/Officer Post-Travel Disclosure Form, 92 Representative Rangel certified his travel cost as the following:

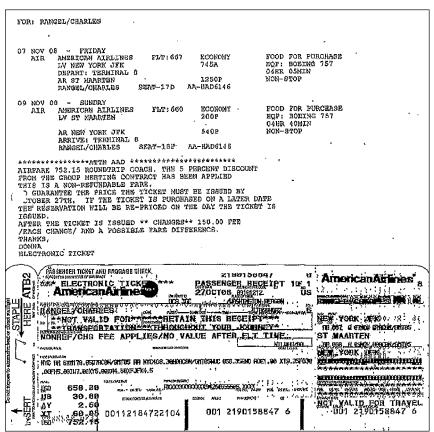
	Total Transportation	Total Lodging Expenses	Total Meal Expenses	
For Member or Officer:	\$410,00	\$260,00	\$145.00	
For accompanying family member:				
	Other Expenses (dollar amount)	Specific Nature of Expenses (e.g., taxi, parking, registratio	n fee, etc.)	
For Member or Officer:	\$150.00; \$25.00	Conference Registration; Local Trans	pariation	
For accompanying family member:				
knowledge. I have d	etermined that all of the duties as a Member of that I am using public that I am using publ	n this form is true, complete, as expenses listed above were net or Officer of the U.S. House of I	cessary and that the travel we	

98. Unlike the other Members of Congress who attended the conference, who apparently used the November 18, 2008 memo to complete the post-travel disclosure, it appears that the figures that Congressman Rangel certified are identical to the estimates Mr. Rodney provided in the Private Sponsor Travel Certification Form submitted for pre-travel approval provide to Congressman Rangel from Mr. Rodney on November 18, 2008.⁹³

99. Congressman Rangel stated he never saw a plane ticket or anything bearing the cost of his flight. The airline would have given him something with which to locate his seat, but that was the extent of what he may have seen.94

Remoer/Omcer rost-1 ravel Disclosure Form signed by Representative Charles B. Rangel (Nov. 24, 2008) (Exhibit 1 at 09–6333 0003). 93 Private Sponsor Travel Certification Form signed by Karl Rodney (Oct. 3, 2008) (Exhibit 1 at 09–6333 0006).

⁹⁴ Memorandum of Interview of Representative Charles Rangel (May 28, 2009) (Exhibit 2 at



100. Documents obtained from Mr. Rodney indicate Congressman Rangel's transportation costs were actually \$752.15.95

101. In his interview with OCE, Congressman Rangel stated that he did not see any documented dollar amounts for airline ticket, the registration fee or for the cost of meals. He stated that, although he signed the certification, he had no idea if the numbers on the forms were accurate. His Chief of Staff filled out all the paperwork. Representative Rangel did not know how much his meals cost or what "transportation" referred to other than his flight. In an interview with the OCE, a staff member of Representative Rangel's office stated that while he did not remember whether the itinerary, above, was given to the Member, it was the kind of document that was typically placed in his briefing book so that he could travel. The staff member also pointed out that the receipt for the electronic ticket, also above, was a document that

⁹⁵ Flight Reservation for Representative Charles Rangel (Oct. 27, 2008) (Exhibit 24 at 09–6333 0279).

⁹⁶ Memorandum of Interview of Representative Charles Rangel (May 28, 2009) (Exhibit 2 at 09–6333 0020.

 $^{^{97} \}rm Memorandum$ of Interview of Representative Charles Rangel (May 28, 2009) (Exhibit 2 at 09–6333 0020).

only would be printed after the Member checked in at the airport for his flight.98

V. Carib News Foundation, as a Private Foundation, Was PROHIBITED FROM PAYING FOR CONGRESSMAN RANGEL'S TRAVEL

102. 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." 99

103. 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. 100

104. 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).¹⁰¹ 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.

105. 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. 102 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. 103 Although framed as a tax provision, the statute essentially bars certain federal employees and federally elected officials

⁹⁸ Memorandum of Interview of Staff Member 1 of Congressman's Rangel's Office (May 27–28) (Exhibit 22 at 09–6333 0253).

⁹⁹ Member/Officer Post-Travel Disclosure Form signed by Representative Charles B. Rangel

⁽Nov. 24, 2008) (Exhibit 1 at 09–6333 0002).

100 Letter from IRS to OCE (Apr. 17, 2009) (Exhibit 8 at 09–6333 0095).

¹⁰⁰ Letter from IRS to OCE (Apr. 17, 2009) (Exhibit 8 at 09–0555 0055).
101 26 U.S.C. §§ 501 and 509.
102 26 U.S.C. §§ 4941 and 4946.
103 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.

from receiving compensation, including reimbursements for international travel, from a private foundation. 104

106. According to Publication 78 of the IRS, a list of all charities claiming 501(c) status, Carib Charities, Inc is a private founda-

107. As such, it appears that the Carib News Foundation's payment of travel expenses for Representative Rangel and his accept-

ance of payment potentially violated the Internal Revenue Code.

108. 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 enforced it for some time. 106

109. Congressman Rangel told the OCE that he was unaware of any limitations on the ability of private foundations to pay for over-

seas travel by government officials. 107

110. 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 Rangel 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.

111. For all these reasons, the Board concludes further review of this matter by the Standards Committee is appropriate.

104 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 transpor-

Ing 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).

105 Online Version of Publication 78 (Accessed online on June 5, 2009 at http://www.irs.gov/app/pub-78/) (Exhibit 8 at 09–6333 0107.1–0107.2).

106 Memorandum from Ethics Counsel at the National Institutes of Health to Deputy Ethics Counsels at NIH (Jun. 2, 2000) (Exhibit 25 at 09–6333 0281–0282).

⁹⁷Memorandum of Interview of Representative Charles Rangel (May 28, 2009) (Exhibit 2 at

EXHIBIT 1

	✓ Original ☐ Amendment
	2708 NOV 24 PH 3: 05 110 th Congress
	MEMBER / OFFICER US. HAUSE OF REF POST-TRAVEL DISCLOSURE FORM
fac pol rep wit Ca	is form is for disclosing the receipt of travel expenses from a private source for meetings, speaking engagements, st-finding trips or similar events in connection with official duties. You need not disclose government-funded or litical travel on this form, or travel that is unrelated to official duties. This form does not eliminate the need to bort all privately-funded travel on the Member or officer's annual Financial Disclosure Statement. In accordance the clause 5 of House Rule 25, complete this form and file it with the Clerk of the House of Representatives, B-106 mon House Office Building, within 15 days after travel is completed. The Clerk is to make these forms available the public as soon as possible after they are received.
1.	Name of Traveler: Representative Charles B. Rangel
2.	Name of Accompanying Family Member (if any): N/A
	b. Relationship to Member/Officer: Spouse Child Other (specify):
3.	a. Date of Departure and Date of Return: 11/7/08 - 11/9/08
	b. Dates at personal expense (if any): N/A
4.	Itinerary (cities of departure – destination – return): NY (JFK) - St. Maarten - NY (JFK)
5.	Sponsor(s) (who paid for the trip): Carib News Foundation
6.	Describe meetings and events attended (attach additional pages if necessary): The conference tooused on
	advancing trade and commercial relations between the City of New York and the nations of the Caribbean which are governed by U.

RANGEL.

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;

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: 1 did not depart for the conference until 11/7/08 but I participated until the end when I

b. the Traveler Form completed by the Member or officer, and c. the Committee on Standards' letter approving my participation on this trip.

trade law under the jurisdiction of the Committee on Ways and Means which I Chair.

left on 11/9/08.

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, [Total Transportation	OTI	Total Lodgi	ng Expenses	Total Mea	l Expenses	
For Member or Officer:	\$410,00	-	\$280,00		\$145,00	-	
For accompanying family member:							-
			-				_
	Other Expenses (dollar amount)			of Expenses g, registration	fee, etc.)		
For Member or Officer:	\$150.00; \$25.00	Confe	ence Registrati	on; Local Transp	oristion		
For accompanying family member:							
		11500					
✓ SIGNATURE OF M	EMBER:	KOR	last	3/-	/	\	
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Version date 9/2003 by Com	mittee on Scandards of Official	Conduct		-		00	_
Version darc 9/2003 by Com	mittee on Standards of Official	Conduct		-		4.00	
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Version date 9/2503 by Com	mittee on Standards of Official	Conduct		5-		08	
Version date 9/2003 by Com	mittee on Standards of Official	Conduct		5			
Version date \$12003 by Com	mittee on Svandurds of Official	Conduct		5 - S			
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Version dare \$12,003 by Com	mittee on Svandurds of Official	Conduct		5-			
Version dare \$12,003 by Com	mittee on Svandurds of Official	Conduct					
Version dare 9/2502 by Com	mittee on Svandurds of Official	Conduct					
Varion dare \$1200 by Com	mittee on Svandurds of Official	Conduct					

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 begos. 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):

- 5	
2.	I represent that the trip will not be financed (in whole or in part) by a federally-registered lobbyist or registered foreign agent (signtly "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
5.	Provide names and titles of ALL House invitees; for each invitee, provide explanation of why the individua
	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 6-9, 2008
7.	Cities of departure destination return: VARIES - DEPENDING ON MEMBER
9.	Boardann Act of 1965: 11 of The sponsor of the trip does not retain or employ a federally registered lobbyist or registered foreign agent: Get C. The trip is for attendance at a one-day event and lobbyist involvement in planning occanising accusation.
	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: By Source of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965: By Source of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965: By Source of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965: By Source of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965: By Source of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965: By Source of the trip does not retain or employ a federally review of the trip is an institution of the Higher Education Act of 1965: By Source of the trip does not retain or employ a federally review of the trip is a second of the Higher Education Act of 1965: By Source of the trip does not retain or employ a federally review or the trip is a second of the trip is a second of the trip is a second of the Higher Education Act of the Higher Education Ac
	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: By the sponsor of the trip does not retain or employ a federally registered lobbyist or registered foreign agent: Solvent and lobbyist involvement in planning, organizing, requesting, or arranging the trip was deminimis under the Committee's travel regulations. 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:
	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: By the sponsor of the trip does not retain or employ a federally registered lobbyist or registered foreign agent: So are 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. 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:

11.	If the trip is not sponsored by an institution of higher education, I represent that a federally-registered lobbysts or foreign agent will not accompany House Members or employees on any segment of the trip (rignif) "yea" by checking box):
	cheming 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)
	CATIO NEWS FOUNDATION (* SEE ATTACHED)
2	Describe such manuals
•	Describe each sponsor's organizational interest in the purpose of the trip: THE INTEREST OF CARIB NEWS FOUNDTION 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 aircreft please indicate if travel is being offered on a commercial flight, chartered flight or on an aircreft operated or paid for by a cerrier not licensed by the Federal Aviation Administration to operate for compensation or hire (i.e., a private aircraft) flight-class is being provided, or if travel is via chartered or private aircraft, please provide an explanation describing why such travel is warranted:
	REGULAR SCHEDLED AIR SERVICE, ECONOMY CLASS
5.	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):
6.	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: \$\vec{\pi}\$ 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):
7.	Reason for selecting the location of the event or trip: SEE ATTACHED
8, 1	Name of hotel or other lodging facility: SONESTA MAHO BEACH RESORT
9. (Cost per night of hotel or other lodging facility (approximate cost may be provided): \$110.00
). I	Reason(s) for selecting hotel or other lodging facility: HAS APPROPRIATE MEETING ROOMS
	2

21. TOTAL EXPENSES FOR EACH PARTICIPANT:

☐ actual amounts ☐ 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 \$ 25	Conference Registration
For each accompanying family member		12830 ITARISPORTATION

22. I represent that reimbursement for miscellaneous travel expenses for the trip, such as travel to and from airports, security costs, interpreter free, visa application fees, and similar expenses, will be for actual costs incurred and are necessary for the purpose of the trip (signify "yet" by checking box):

Signature:	a strate	
Name and title:	KARL B. HODNEY, DEO	
Organization:	CARIB NEWS FOUNDTION	
Address:	7 WEST 36th STREET, 8th FLOOR, NEW YORK	C, NY 1001B
Telephone number:	(212) 944-	sdMACA
Fax number:	(212) 944-2089	14
Email Address:	@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:

unes are any questions regarding this form pleas
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

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CANN GIVES

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



Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10017
Tel: (212) 944 = Fax: (212) 944-2089
E-mail: Receivement of the Street

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 \$01-C3 corporation

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A CARIBNEWS PROGRAM

CARIBBEAN MULTINATIONAL BUSINESS CONFERENCE

ROING BUGINESS FORTHER

REGISTER AGENDA ABOUT THE CONFERENCE HOTEL FAQ PARTICIPANTS PRESS CONTACT US HOME

The 2008 Program Agenda

[View 2007 Agenda]

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 Maria 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 Mitchelle Palige 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

MC - Judge Sylvia Hinds-Radix

Speakers - Susan Taylor & Hon. Donald Payne, Member Of The United States Congress

HOSPITALITY AREA Time - 10:00 PM to 1:00 AM

FRIDAY NOVEMBER 7TH 2008

httn://www.caribnewsconference.com/conference 05/agenda.html

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BREAKFAST - OCEAN TERRACE Time - 8:00 AM to 8:45 AM

CONFERENCE REGISTRATION (OCEAN TERRACE LOBBY) * CONFERENCE SECRETARIAT (SABA ROOM)
Time - 9:00 AM to 6:00 PM

BUSINESS CONFERENCE OPENING CEREMONIES Time - 9:00 AM to 10:15 AM Vonue - Maho Room Theme - Building Alliances For Progress

Invocation - Rev. Susan Johnson-Cook Anthems - Saint Maarten 'Lift Every Voice'

Remarks - Eric Eve, Karen Boykin-Towns, Marie Long, Ed Goldberg, Patrick Gaston, Hazel Dukes

Speakers - Hon, Carolyn Cheeks Kilipatrick, Member US Congress * Commissioner Sarah Wescot Williams, Leader of Government, St. Maarton * Harry Belafonte

RIBBON CUTTING CEREMONIES
Time - 10:15 AM to 10:30 AM Coffee Break * 10:30 AM to 11:45 AM Presentation

EDUCATION - TECHNOLOGICAL ADVANCES COLLABORATION

Moderator - Dr. Emmanuel Gonsalves Greetings - Marie Long Speakers - Dr. Edison Jackson, Patrick Gaston, Dr. Marcia Keizs, Congresswoman Eddie Bernice Johnson, Professor Rex Nettleford

PRESENTATION - INTERNATIONAL TRAVEL & TOURISM TODAY'S ECONOMIC ENGINE' Time - 12:00 Noon to 1:15 PM

Moderator - Lloyd A Williams, President & CEO of The Greater Harlem Chamber Of Commerce Greeting - Wallace Ford Speakers - Commissioner Roy Marlin, Howard Dodson, Congressman Gregory Meeks, Professor Rex Nettleford, Dr. Martin Valdes

PRESENTATION - HEALTH AN ECONOMIC DEVELOPMENT STRATEGY FOR THE REGION Time - 12:00 Noon to 1:15 PM

Modorator - Yvonne Graham 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 - THINKFINITY 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

http://www.caribnewsconference.com/conference 05/agenda.html

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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 Payne, Assemblyman NJ

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 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 of York College, Michelle Paterson, First Lady New York State, Congresswoman Eddie Bernice Johnson, Rev. Dr. Susan Johnson Cook

PRESENTATION - THE CARIBBEAN, IT'S VALUE & POTENTIAL IN TIMES OF CRISIS Time - 10:15 AM to 11:45 AM Venue - Royal Islander A

Greeting - 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 of St. Kitt-Nevis, Congressman Charles Rangel

PRIVATE MEETING CLOSED DOOR SESSION With Members Of Congress & Minister Of Government Time - 12:00 Noon to 1:30 PM

PRESENTATION - TRADE & INVESTMENT - CREATIVE SOLUTIONS RETOOLING FOR GROWTH - PARTIMENSHIP AT WORK Time - 12:00 Noon to 1:15 PM Vonue - Royal Islander A

Greeting - Michael Flanigan Moderator - Ivanhoe Ffriend

Speakers - Hon William Thompson, Comptroller, NYC, Adolfo Carrion, Borough President, Bronx, NY,

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Congressman Edolphus Towns, Eric Eve

PRESENTATION - HEMISPHERIC SECURITY - PORTS/AIRPORTS - CRIME, DRUGS, DISASTER IN CHALLENGING TIMES
1. TO A CONTROL 1:15 PM
Venue - Royal Islander B
1. To A Control I Security - PORTS/AIRPORTS - CRIME, DRUGS, DISASTER IN THE CHALLENGING TIME - 12:00 NOON to 1:15 PM
Venue - Royal Islander B

Greeting - Earl Brown, Deputy Borough President, Bronx, Judge Sylvia Ash, Tony Best, Congressman Bennie Thompson, Commissioner Theo Heyliger, St Maarten, Professor Ivelaw Griffith, Hon Lance Ogiste, Brooklyn District Attorney

LUNCHEON - AN AGENDA FOR PARTNERSHIP Time - 1:30 PM to 2:30 PM Venue - Maho Room

Greeting - Lloyd Brown
Speaker - Most Hon. P.J. Patterson, former Prime Minister of Jamaica & President of Heis Consults, Dr.
Compton Bourne, President CDB

ROUND TABLE ONE - 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 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 Wescot Williams, Leader of Government Business

HOSPITALITY AREA Time - 10:30 PM to 1:00 AM Venue - Hotel Conference Room

SUNDAY NOVEMBER 9TH 2008

httn://www.caribnewsconference.com/conference_05/agenda.html

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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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http://www.caribnewsconference.com/conference 05/agenda.html

11/24/2008

11/21/08 13:56 FAX 212 663 4277 Nov-21-2008 01:04pm From-Congressman Rangel HOUSE OF REPRESENTATIVES

121002

1 202 2250816

T-934 P.004/005 F-581

U.S. House of Representatives Committee on Standards of Official Conduct

PRIVATELY SPONSORED TRAVEL: TRAVELER FORM For Members, Officers, and Employees

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 fixed 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 Travelor: Charles B. Rangel
I certify that the information contained on both pages of this farm if true, complete, and correct to the best of my knowledge.
× Signature;
Name of Signatory (if other than traveler):
For staff, name of employing Member/Committee:
Office address: 2554 Rayoum HOB U. S. House of Representatives, Wishin
Phone number: (302) 1325-
Email address of contact person: reach of george college Man house
Check this box if the sponsoring entity is a media out of and the traveler is a Machber 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 HT-2, The Capitol Washington, DC 20515 (202) 225-7103 (phone) (202) 225-7392 (fix)

Version date 9/2008 by Committee on Standards of Official Conduct

11/21/US 13:30 FAA 212 000 4211 Nov-21-2008 01:04sm From-Congresman Rangel

1 202 2250816

T-934 P.005/005 F-581

U.S. House of Representatives Committee on Standards of Official Conduct

	PRIVATELY SPONSORED TRAVEL: TRAVELER FORM
	Name of Traveler: Congressman Charles B. Fangel
	Sponspr(s) (Who will be paying for the trip): Alen YNCan'b Aveuls
,	Travel destination(s): S. Maarten
	a. Date of Departure and Date of Return: November 6 - 9, 2008
	b. Will you be extending the trip at your personal expense? ☐ Yes ☐ No
	If yes, dates at personal expense:
	a. Will you be accompanied by a family member at the sponsor's expense? Yes Wo
	b. If yes, name of accompanying family member:
	c, Relationship to traveler: Spouse Other (specify):
5.	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 warranged:
	Private Sponsor Travel Certification Form is attached, including egenda, invites list, and any other attachments (indicate that form is attached by checking box):
	Explain why participation in the trip is connected to your individual official or representational duties:
h	conserve advance trade and commenial relations ir taken the Cit
ú	The notions of the Conthannotion are governed held S Hab lawinder
),	FOR STAFF: CHOPTO FINE CONMINER OF WAY COM MEANS WHICH 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 supployee's official duties and that acceptance of these expenses will not create the appearance that the supployee is using public office for private gain,
	Date: Signature of Employing Member

NOTE: This page must he submitted with your pass-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
CHAShington, DC 20515

October 23, 2008

The Honorable Charles B. Rangel U.S. House of Representatives 2354 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 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 Charles B. Rangel October 23, 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

EXHIBIT 2

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 Charles Rangel

Review #:

09-6333; 09-2567; 09-4403; 09-3698; 09-2222

Date:

May 28, 2009 163 West 125th St.

Location:

New York, NY 10027

2:15pm to 3:30 p.m. (approximately)

Participants: Leo Wise

Omar Ashmawy

Summary: Representative Charles Rangel is a Member of the United States House of Representatives representing the Fifteenth District of New York. He was interviewed pursuant to Review 09-6333; 09-2567; 09-4403; 09-3698; and 09-2222. We requested an interview with Representative Rangel and he consented to au interview. Representative Rangel's counsel was present via telephone. Representative Rangel made the following statements in response to our

- 1. Representative Rangel was given an 18 U.S.C. § 1001 warning and consented to an interview. Representative Rangel signed a written acknowledgement of the warning.
- 2. Representative Rangel attended the 13th Annual Caribbean Multi-National Business Conference in St. Maarten. While attending the conference he stayed at a hotel on site. His room was an ordinary, single room. He arrived at the conference on Friday and left on Sunday. He did not attend the off-site reception.
- 3. He was invited to the conference because of his interested in the region and trade with the region. He was the original sponsor of Caribbean trade initiatives and officials in the Caribbean governments know of his interest in the region. The conference is a good place for Representative Rangel to build relationships with both local New York officials and officials in the Caribbean.

RANGEL MOI - Page 1 of 5

Office of Congressional Ethics

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

- While attending the conference, Representative Rangel did not eat separate from the conference sessions.
- 5. When asked who invited him to the conference, Representative Rangel replied that his chief of staff, George Dalley, invited him. Mr. Dalley has known the Rodneys longer than Representative Rangel has known them. The Rodneys deal with Mr. Dalley and Mr. Dalley does all the paperwork.
- 6. Representative Rangel met the Rodneys about 20 years ago during a trip to Jamaica. The Rodneys were part of the host/welcoming committee that greeted him. Afterwards, Representative Rangel learned that they published the CaribNews newspaper. Other than at his fundraisers, the only time Representative Rangel sees the Rodneys is at the conference or at a fundraiser for the University of the West Indies.
- The relationship between the Rodneys and the conference is that the Rodneys are the conference.
- Representative Rangel was shown the pre-travel forms for the 2008 trip. He identified his signature and remembered signing the forms.
- 9. Representative Rangel assumed his travel arrangements were made by Mr. Dalley as he was in charge of making the arrangements. When asked for more details, Representative Rangel said that there were no tickets or anything else. His driver knows where to go, the Member shows up, shows his identification at the counter and is asked where he is going and then he is on a plane and at his destination.
- 10. The Member was shown a copy of his tickets for the trip in question and stated that he had not seen them before. The airline would have given him something to find his seat but that was it. He did not know if he had an electronic ticket. Representative Rangel did remember having something that got him to the plane, but did not remember ever seeing plane tickets.
- 11. When asked about paperwork, the Member stated that there was no paperwork except for what went to the Standards Committee and that was just him signing documents.
- 12. The Member was shown the post-travel forms and identified his signature. Both the post and pre-travel form were filled out by Mr. Dalley. Mr. Dalley did not show him any documents supporting the amounts shown on the forms. Representative Rangel had no idea if the numbers on the forms were accurate. He did not know how much his meals cost or even what "transportation" means other than his flight. Representative Rangel

RANGEL MOI - Page 2 of 5

Office of Congressional Ethics

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended stated that Mr. Dalley did not make up the numbers and assumed Mr. Dalley was fulfilling his obligation to the Standards Committee and to Representative Rangel.

- 13. Representative Rangel was not aware of the host government's participation in the conference. He knew that they provided protection for him, but other than travel from the airport to the hotel and back he did not use it. He was given a number to call if he wished a car and police escort, but did not utilize the number.
- 14. When asked: Other than host, did you know what St. Maarten provided to the conference? Representative Rangel stated he did not know, and asked how he would know and that he had no idea.
- 15. The Rodneys attend the conference as part of the CaribNews Foundation. The foundation was the conference. They put the program together and invited him.
- 16. Other than the conference, the Member has not participated in any other event or function conducted by the foundation. He was not aware of anything the foundation does other than the conference nor has he been involved in any other program sponsored by or planned by the foundation.
- 17. Representative Rangel did not remember any corporations identified as sponsors. He stated he knew the fact he did not remember was a problem, but he simply did not remember.
- 18. With the exception of Golden Krust, he did not remember any business people or sponsors identifying themselves as representatives of business.
- 19. Representative Rangel did not participate in the conference except where he was asked to speak. If his name was not on the agenda for a particular program then he was not there. He only went to one breakout panel because it was hosted by David Dinkins and Mr. Dinkins had attended the panel hosted by Representative Rangel. When he was not participating in the conference the Member walked around, went to town for a brief trip, did some reading, and spoke to Mr. Dinkins. He did not go to the beach or anywhere else.
- 20. The only people he recognized at the conference were other Members of Congress and people he knew from the district. He never recognized anyone from any corporation. He did not see them and they did not identify themselves as sponsors.

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- 21. Representative Rangel would not know Mr. Michael Flannigan if his life depended on it. Neither did the Member recognize the names Marilyn Johnson, Ed Goldberg, Patrick Gaston or Albert Browne.
- 22. The Member did not know how the CaribNews Foundation put on the conference. It has never been an issue and he has never discussed the matter with the Rodneys. Representative Rangel did not know how they function.
- 23. Representative Rangel did not know the nature of the foundations 501(C)(3) status. He just knew they were charitable. He specifically did not know if they were a private foundation or a public charity. Neither was he aware of any limitations on travel paid by a private foundation. The only thing Representative Rangel knew was that if the Standards Committee told him he could go, then he could go. He was not aware of any IRS restrictions on private foundations, but assumed the Standards Committee would know
- 24. The event identified in the agenda as a closed door meeting with Members of Congress was a meeting between the Members and foreigners and those concerned with the politics of America. The meeting was for off the record issues. Representative Rangel was adamant that corporate sponsors of the conference did not attend the meeting. There was no one who was in a room with him that identified themselves as corporate sponsors, especially in the closed door session as it would have been offensive for corporations to have been present.
- 25. When the rules changed in 2007, the Member did not get any training on the changes, but he assumed that Mr. Dalley knew what he was doing. He assumed that Mr. Dalley did everything right especially in light of the Member's reluctance to attend the conference. Mr. Dalley gave the Member reason to believe he was having many conversations with the Standards Committee and that Mr. Dalley was following the rules.
- 26. Representative Rangel has not spoken to the Rodneys since the conference. He has spoken to Representative Carolyn Kilpatrick, but only about the fact she was contacted by OCE. He has not spoken to any other member of the Congressional Black Caucus. The Member has not even spoken to Mr. Dalley because Mr. Dalley said that it might not be a good idea given the fact that both men were going to be interviewed by OCE. Representative Rangel presumes that Mr. Dalley feels that he did not provide the Representative with the kind of service he should have.

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27. Representative Rangel then stated that he wished he had paid more attention when the OCE was being formed and that when this is over he will take a good look at the process. He stated that he was informing us as public servants, that if a newspaper reporter can do this, reputations can be damaged. The mere fact that this can get to stage two meant that he owed Congress and this process to make sure it is as fair as the people who sold it said it was

I prepared this Memorandum of Interview on May 28, 2009 after interviewing Representative Charles Rangel on May 27, 2009. I certify that this memorandum contains all pertinent matter discussed with Representative Rangel on May 27, 2009.

Omar Ashmawy Investigative Counsel

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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:

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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.

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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.

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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

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.

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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]

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.

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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, Muslin, 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 Pll 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 falking 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:

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(Part 2 - beginning at 30:00 through 1:15)

WILLIAM C. THOMPSON, IR.: - 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 Congressional Clarks 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

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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 1 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]

Page 2 of 11 09-6333 0034 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 \times 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]

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

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

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 Ware 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 isle 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 cyes 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 Hasslethompson, 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. 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

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:

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BEGIN PART 3:

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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

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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,

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

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 marshall 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

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.

Tem 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 causal 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

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 Citi

Review #:

09-2567; 09-4403; 09-3698; 09-6333; 09-2222

Date: Location: March 17, 2009

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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- 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.
 - 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

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Office of Congressional Ethics

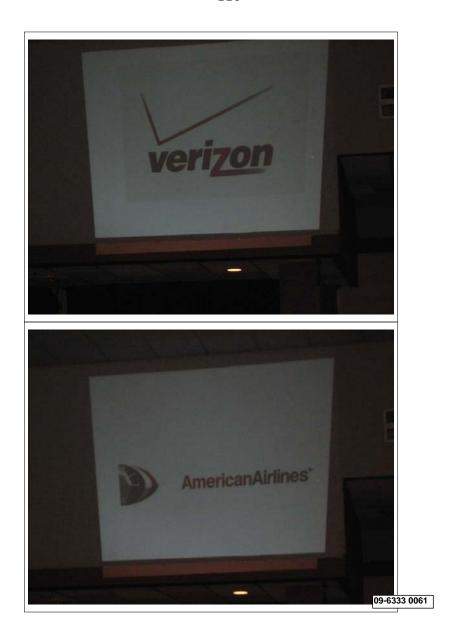
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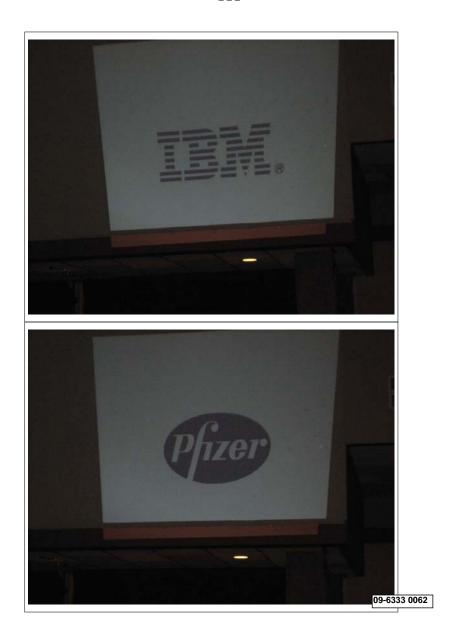
EXHIBIT 5















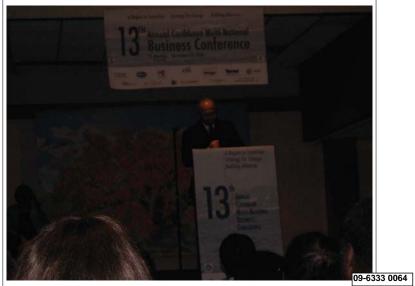










EXHIBIT 6

STROOCK



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

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.

 $\label{eq:continuous} \mbox{If you have any questions regarding this information, please do not he sitate to call.}$

very truly yours,

Devialla Alfanza Walkman

EXHIBIT 7

AKIN GUMP STRAUSS HAUER & FELDLLP

Attorneys at Law



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.

Steven R. Ross

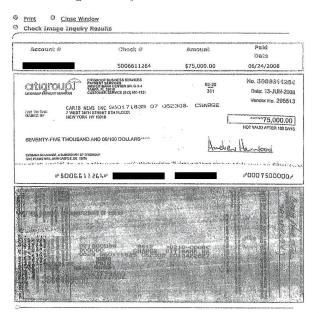
Sincerely,

Robert S. Strauss Boliding / 1333 New Hempahire Avenue, N.W. / Washington, D.C. 20038-1584 / 202.887.4000 / fax: 202.887.4288 / www.skington.com



^e Privacy^a Citigroup.com

Citi Check Image Delivery





Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10018
Tel: (212) 944-208: Fax: (212) 944-2089
E-mail: <u>@caribnewsconference.com</u>

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

We would be happy to answer any questions you might have or to fill in any detail. I can be reached by e-mail: @nycaribnews.com or (212) 944-

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. Rø

Karl B. Rodney Publisher/CEO



ARITERIAN MULTI-NATIONAL BUSINESS CONFERMANCE

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.





09-6333 0077

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

- Corporate
- Government
- Economic
- Civic
- ◆ Entrepreneurs

- Products/Services
 Showcase/Public affairs
- Developing new business opportunities
- Fostering business partnerships
 - Building Global Communities
- Creating Global Alliances to expand customer base



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





- Jamaica 1996
- Barbados 1997
 - St. Lucia 1998
- St. Croix/USVI 1999
 - Jamaica 2000
- The Bahamas-2003

St. Maarten - 2002

- Grenada 2001
- St. Kitts-Nevis-2004
- Panama city, panama 2006 ST. Thomas, USVI - 2005

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

Sponsor Private VIP Reception and specially arranged forum Keynote Speaker at Main Event

Special Awards Presentation

Display, Exhibition and signage

Area of Conference -Reserved for exclusive sponsorship *

Full page Ad in program

Accommodations: One Suite and One Standard Room Air Transportation for 2 people

Included in all printed materials Included in Internet promotion

Display company logo and link to our website * 4.4

Sponsor of a Gala Event

Sponsor and Participate in a workshop *

Representative listed in program with bio and photo





PARTOPATOR

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 $\boldsymbol{1}$





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
- Full Page ad in program and recap
- Representatives listed in program with bio & photos
- Representatives listed in brochure





09-6333 0085

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 program with bio & photo Representatives listed in brochure

\$10,000

- Display and Exhibition
- Banner in Public areas & at workshop
- Included in some Radio and TV Promotions Included in some printed materials
 - Included in the internet promotion
- Full Page ad in program and 1/2 page in
 - Representatives listed in program

(many

Participation Government



informed. There would never have been a banana problem had we (CBC) known about the issue before it went to the WTO." "This Conference is keeping us



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. Baddwin Spencer
Prime Minister of Autigua "The Conference in Antigua with Members of the U.S. Congress was very important and extremely vital to both the U.S. and

"The conference is central to the



been scripted. The sessions brought out ideas, options and other benefits which should be long lasting". Juan Carlos Navaarro, Mayor, Panama City, Republic of Panama beyond our expectations. The process of bringing families together, of sharing a vision for our countries, couldn't have "The results of the Conference went far



DOING BUSINESS TOGETHER CARIBNEWS

09-6333 0087

PARTICIPANTS CORPORATE



Eric Ere – 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 climates. The Conference is a great place to start to open clear lines of communication between the private and public sectors of the economies and stability of their business Caribbean and the U.S."

Marityn Jolmson, WP 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 heath forums decision makers. Collaboration is necessary between the Caribbean to make improvements internationally, but also to network with key and adjustments to healthcare and its



Educard 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."

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 Bank - "We provide financial services to a vast array of businesses and individuals, and this Javier Evans, FVP Human Resources, HSBC

CARIB NEWS and the Conference. It is a fremendous value to us."





OPPORTUNITIES UNIQUE



Ambassador Andrew Young

"If only the sons and daughters of Africa will remember from wherene 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 Carlb News Conterence is so important and that is why I support it."



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".



Hon. Percy Sutton
"We badly needed a forum to address the
need of us working together. This conterence is
an excellent idea and we should have been

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".



"The conferences, presenters and participants have been extraordinary. I have gained tremendous knowledge on the Caribbean Disspora. I continue to promote and foster relationships with communities here and at home

Hazel N. Dukes, President, New York State

doing this long ago."

* (1)

Susan Taylor, Editor Emeritus, Essence Magazine

"It is always so wonderful to experience the drive, enthusisan and determination of the Conference participants. It says something wonderful is happening and we all need to that into it. It provides such outstanding opportunities to connect with real people who can make things happen".



"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"

Harry Belafonte, Entertainer

Lloyd Williams, President/CEO Greater Harlem Chamber of

"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". Commerce

14



BOING BUSINESS TOGETHER CAPTEMENTS

























A WEEK-END THAT CHANGES LIVES



EXHIBIT 8

Allison Hayward

David Skaggs, Chair Porter Goss, Co-Chair Yeonne Burke Jay Eagen Karan English William Frenzel 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 IIII 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). Iunderstand 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(amail.house.gov. Thank you again for your help with this matter.

Efalalk Horke

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PRINTED ON RECYCLED PAPER

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 Type or print clearly. Request may be rejected if the form is incomplete or illegible.

OMB No. 1545-0495

TIP	You may not have to complete Form 4506-A to get the copies you need.
• Inf	ternet, Form 8871, Political Organization Notice of Continuous Co.

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.

1 Exempt or political organization. If a multiple request, please at	tach list of names, forms, and tax years.
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OFFICE OF CONGRESSIONAL	ETHICS EUZABETH HORTON
City or town, state, and ZIP code	(LDING (202) 225 - 9739
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Lines 5-9. For each applicable form, check the box(es) for the item(s) requested, check either the copy, inspection, or CD/DVD box and enterindicate the format, state(s), and month(s) requested.) you are requesting. You may request more than one form. For each form ar the specific tax year(s), as indicated. If ordering a partial set on CD/DVD,
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6 Form 990-PF □ Copy □ Inspection Tax year(s) requested: 200(e 2007; 2008(if 61ed)	☐ CD/DVD Format: ☐ Alchemy ☐ Raw State(s):
7 Form 990-T (501(c)(3) organizations filed after 8/17/2006) Copy inspection Tax year(s) requested: ;	☐ CD/DVD Format: ☐ Alchemy ☐ Raw State(s):;; Months:;;
8 Form 5227 Copy Inspection	9 Form 1023, 1024 or Determination Letter Copy Inspection
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IRS U	se Only
The form requested above was inspected by (name of requester)	IRS office where inspection was made
Signature of employee present at inspection	Date
For Privacy Act and Paperwork Reduction Act Notice, see the sepa	rate instructions. Cat. No. 41722P Form 4506~A (Rev. 1-2000)



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.
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Use for payments

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INTERNAL REVENUE SERVICE

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In reply refer to: 0412606945 Apr. 17, 2009 LTR 3983C E1 13-3632050 000000 00 000 00027842 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 __

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Total not proof a find before 1 min 2 (Hernize)				4	
	Total r	net assets or fund balances at and of year firm		5	

(a) List and describe the	e kind(s) of property sold (e.g., real ie, or common stock, 200 shs MLC	estate,	(b) How acquired	(c) Date acquired	(d) Date sold
2-story onck warehous	e, or common stock, 200 shs MLC	(Co)	P—Purchase D—Donation	(c) Date acquired (mo , day, yr)	(mo , day, yr)
Q					
			 		
(e) Gross sales price	(f) Depreciation allowed (or allowable)	(g) Cost or plus expe	other basis ase of sale	(h) Gam (e) plus (f	or (loss)) minus (g)
					
Complete only for assets shown	g gain in column (h) and owne	d by the foundation	n on 12/31/69		
(i) FMV as of 12/31/69	(i) Adjusted basis as of 12/31/69	(k) Exces	s of col (i) (j), if any	(I) Gains (Col col (k), but not Losses (fr	(h) gain minus less than -O-) or om col (h))
Desired and the second	(If gain	ilso enter in Parl	11600	<u> </u>	
Capital gain net income or (n	If (loss),	enter -0- in Part	1. \time b / i i	2	
Vet short-term capital gain o	r (loss) as defined in sectio	ns 1222(5) and (s). \		
f gain, also enter in Part I, line	8, column (c) (see pages 13	and 17 of the mis	tructions).		
f (loss), enter -0- in Part I, lir	e 8			3	
optional use by domestic pr ction 4940(d)(2) applies, leav the organization liable for th	e this part blank.	the Section 494	O(a) tax on net i	nvestment income	
optional use by domestic proction 4940(d)(2) applies, leaven the organization liable for the s.," the organization does not be s.,"	ivate foundations subject to e this part blank. e section 4942 tak on the ot qualify under section 494	distributable amo	O(a) tax on net i unt of any year nplete this part	nvestment income	7 🗆 Yes 🗆 No
optional use by domestic proction 4940(d)(2) applies, leave the organization hable for the s.," the organization does not	ivate foundations subject (c e this part blank e section 4942 tak on the ot qualify under section 494 in each column for each y	distributable amo 0(e). Do not con ear; see page 18	O(a) tax on net i unt of any year nplete this part	nvestment income	7 🗌 Yes 🗌 No
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optional use by domestic proction 4940(d)(2) applies, leave the organization hable for the significant does not the organization does not the appropriate amount the appropriate amount the appropriate amount the appropriate amount to the appropriate amount the appropriate amount to the appropriate amount	ivate foundations subject (c e this part blank e section 4942 tak on the ot qualify under section 494 in each column for each y	distributable amo 0(e). Do not con ear; see page 18	unt of any year uplete this part of the instruction	in the base penod	7 Yes No any entnes.
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optional use by domestic proton 4940(d)(2) applies, leav the organization liable for thes," the organization does not the appropriate amount the appropriate amo	ivate foundations subject (c e this part blank e section 4942 tak on the ot qualify under section 494 in each column for each y	distributable amo 0(e). Do not con ear; see page 18	unt of any year uplete this part of the instruction	in the base penod	7 Yes No any entnes.
optional use by domestic protonal use by domestic proton 4940(d)(2) applies, leav the organization liable for the s." the organization does not refer the appropriate amount appropriate amount of the second proton of the	ivate foundations subject (c e this part blank e section 4942 tak on the ot qualify under section 494 in each column for each y	distributable amo 0(e). Do not con ear; see page 18	unt of any year uplete this part of the instruction	in the base penod	7 Yes No any entnes.
optional use by domestic proton 4940(d)(2) applies, leav the organization liable for the s." the organization does not the appropriate amount the appropriate amount the appropriate amount (a). Base period years and a year (a) the year beginning oil 2004 2003 2002 2001 2000	ivate foundations subject (c e this part blank e section 4942 tak on the ot qualify under section 494 in each column for each y	distributable amo 0(e). Do not con ear; see page 18	unt of any year uplete this part of the instruction	in the base penod	7 Yes No any entnes.
optional use by domestic protonal use by domestic proton 4940(d)(2) applies, leave the organization hable for these," the organization does not inter the appropriate amount of the appropriate	wate foundations subject to ethis part blank, e section 4942 tat to the transfer of qualify under south 494 in each columnitor each y Adjusted qualifying detinbution	Strick Section 494 istributable amore 0(e). Do not concear; see page 18 Net value of	Unit of any year unit of any year uplete this part of the instruction (c) noncharitable-use as	in the base penod in the base	7 Yes No any entnes.
optional use by domestic proton also (d)(d)(2) applies, teav the organization liable for the s." the organization does in the symmetry of the appropriate amount makes per symmetry of the appropriate amount as per symmetry of the appropriate amount of t	wate foundations subject to ethis part blank. e section 4942 tak to the ot qualify under sextion 494 in each column for each y Adjusted qualifying databutic	in the Section 494 distributable amore of the control of the contr	Unit of any year unit of any year uplete this part of the instructor (c) noncharitable-use as	in the base penod in the base	7 Yes No any entnes.
optional use by domestic protonal use by domestic proton 4940(d)(2) applies, feave the organization hable for these," the organization does not expense the organization does not expense the organization does not expense the appropriate amount of the organization of	wate foundations subject to ethis part blank. e section 4942 tak on the ot qualify under south 494 in each column for each y low and the column for each y l	ine section 494 sistributable amo 0(e). Do not con ear; see page 18 Net value of	Unit of any year plete this part of the instruction (c) noncharitable use as line 2 by 5, or lears.	in the base penod ins before making tool (b) di tool (7 Yes No any entnes.
optional use by domestic proton 4940(d)(2) applies, leav the organization liable for the s," the organization does not the proton of the second of the secon	wate foundations subject to ethis part blank. e section 4942 tak on the ot qualify under south 494 in each column for each y low and the column for each y l	ine section 494 sistributable amo 0(e). Do not con ear; see page 18 Net value of	Unit of any year plete this part of the instruction (c) noncharitable use as line 2 by 5, or lears.	in the base penod on the base penod on before making Despisors (col (b) de	7 Yes No any entnes.
optional use by domestic protonal use by domestic proton 4940(d)(2) applies, leave the organization hable for the se," the organization does not inter the appropriate amount of the proton of the second of the sec	wate foundations subject to ethis part blank, e section 4942 tat to ine of qualify under satisfying the satisfying destination of the satisfying destination of the satisfying destination the satisfying destination that satisfy	is section 494 is instributable amo 0(e). Do not con ear; see page 18 ns Net value of value of the total on e if less than 5 y from Part X, line	Unit of any year plete this part of the instruction (c) noncharitable use as line 2 by 5, or lears.	in the base penod ons before making (cot (b) di	7 Yes No any entnes.
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optional use by domestic protein also developed, applies, teave the organization liable for the service of the organization does not the organization does not the the appropriate amount of the appropr	wate foundations subject to e this part blank. e section 4942 tak to the of qualify under sextion 494 in each column for each y light and the sextion 494 in each column for each y light and the sexting database of the sex	is section 494 is instributable amo 0(e). Do not con ear; see page 18 ns Net value of vide the total on e if less than 5 y from Part X, line	U(a) tax on net is unt of any year uplete this part of the instruction (c) noncharitable-use as line 2 by 5, or line 2 by 5, or lears.	nvestment income in the base penod ins before making Desiration (cot (b) de	7 Yes No any entnes. (6) bothorn also botho
optional use by domestic protonal use by domestic proton 4940(d)(2) applies, leave the organization hable for these," the organization does not inter the appropriate amount of the organization does not inter the appropriate amount of the appropriate amount of the appropriate amount of the appropriate amount of the appropriate of the a	wate foundations subject to e this part blank. e section 4942 tak to the of qualify under sextion 494 in each column for each y light and the sextion 494 in each column for each y light and the sexting database of the sex	is section 494 is instributable amo 0(e). Do not con ear; see page 18 ns Net value of vide the total on e if less than 5 y from Part X, line	U(a) tax on net is unt of any year uplete this part of the instruction (c) noncharitable-use as line 2 by 5, or line 2 by 5, or lears.	in the base penod in the base penod in the base penod ins before making issets (col (b) dr. 2 2 3 4 5 6 7 8 6 7 8 8 that part using a	7 Yes No any entnes. (6) bothorn also botho

Form 990-PF (2005) Part VI Excise Tax Rased on Investment Lease Co.	
	Page
1a Exempt operating foundations described in section 4940(p)(2), check bere ▶ ☐ and enter "N/A" on line 1. ☐	structions)
Date of ruling letter:	- 1
b Domestic organizations that meet the section 4940(e) requirements in Part V, check 1 1	
here ► and enter 1% of Part I, line 27b. All other domestic organizations enter 2% of line 27b.	
2 Tax under section 511 (demonstration and an account foreign digitalians enter 4% of Part I, line 12, col. (b)	
3 Add lines 1 and 2	
4 Subtitle A (income) tax (idemostic section 4047/344)	
5 Tax based on investment income. Subtract line 4 for the based on investment income. Subtract line 4 for the based on investment income.	
6 Credits/Payments.	
a 2005 estimated tax payments and 2004 overpayment credited to 2005 6a	
	- 1
10 Overpayment If line 7 is more than the 7, enter amount owed	-+
11 Enter the amount of line 10 to be 20 miles 5 and 6, enter the amount overpaid	
Pair VIDA Statements Regarding Activities Refunded ▶ 11	
1a During the tourses of the	
the participate or intervene in any political campaign? 1 participate or intervene in any political campaign? 1 political spend more than \$100 during the year (either directly or indirectly) for included purposes (size	Yes No
b Did it spend more than \$100 during the year (wither directly a part)	- V
If the answer is "Yes" to 1a or 1b, attach a detailed description of the perivities and copies of any materials published or distributed by the organization in connection with the advances.	1
c Did the organization file Form 1120-PDL for this year? d Enter the amount (if any) of tax on profiting exponentiation.	
d Enter the amount (if any) of tax on political expenditures (section 4955) imposed during the year: (1) On the organization ▶ \$ 20 € 10	44
(1) On the organization ► \$ (2) on produced expenditures (section 4955) imposed during the year: (2) on production managers. ► \$ Enter the reimbursement (if any) paid by the organization managers. ► \$	1
e Enter the reimbursement (if any) paid by the organication during the year for political expenditure tax imposed on organization managers.	- 1
2 Has the programment of the pro	i
2 Has the organization engaged in any activities that have not previously been reported to the IRS?	12
	- [
of incorporation, or bylaws, or other similar instruments? If "Yes," attach a conformed copy of the changes. 3 Did the organization have unrelated by singes process leaves."	
4a Did the organization have unrelated business gross income of \$1,000 or more during the changes b If "Yes," has it filed a tax return on Form 990-T for this year? 4a	10
b if "Yes," has it filed a tax return on Form 990-T for this year? Was there a liquidation, termination, dissolution or substantial research.	14
Was there a liquidation, termination, dissolution, or substantial contraction during the year? 4b If "Yes," attach the statement required by Concept Learning to 1.	14
If "Yes," attach the statement required by General Instruction T.	
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 and the state of the state	
By state legislation that effectively amends the governing instrument so that no mandatory directions but the contact with the state law remain in the governing instrument? Out the organization have at least \$5000 in assets at any time drain a least \$1000 in assets at any time drain a least \$1000 in assets \$10000 in assets \$10000 in assets \$10000 in assets \$	
Did the organization have at least \$5 000 in proate at a second in the contract of the contrac	12
a Enter the states to which the foundation of the states to the states	1
instructions) - missing the control of the instructions of the instruction of the instructions of the instruction of the instruction of the instruction of the instruc	
b if the answer is "Yes" to line 7, beauty	1
General (or designate) of each state as society of the state as copy of Form 990-PF to the Attorney	·
Is the organization claiming status as a private operating foundation within the meaning of section 4942()(3) for calendar year 2005 or the taxable year beginning in 2005 (4) (3)	1
or 4942(i)(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 on	1
page 26)? If "Yes," complete Part XIV Od any persons become substantial continuous dumo the lax wead if "Yes," " Machine I was a later to the lax wead if "Yes," " Machine I was a later to the lax wead if "Yes," and the lax wead if "Yes,	-
Old any persons become substantial continuous during the tax year? If "Yes," attach a schedule listing their names and addresses. 9 10 11	14
Did the organization comply with the public inspection requirements for its annual returns and exemption application? 10 11	1/1
Web site address ►	10
The books are in care of ► Telephone no. ►	
Section 4947(a)(1)/1P+4	
Sectron 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 account to the amount of tax-exempt interest received or account to the control of the control of tax-exempt interest received or account to the control of tax-exempt interest received in tax-exempt interest received in the control of tax-exempt interest received in tax-exempt interest received interest received in tax-exempt in tax-exempt interest received in tax-exempt in t	
and enter the amount of tax-exempt interest received or accrued during the year 13	- 1
Form 990-P	F (2005)
. THIS IS A CORN	333 00

	rt VII-B Statements Regarding Activities for Which Form 4720 May Be Required			Page
	File Form 4/20 if any item is checked in the "Veet and	T	Yes	IN
lá			1	+
	(1) Engage in the sale or exchange, or leasing of property with a disqualified person? Yes No.		1	
		1	1	l
		1		
		1	1	1
	(1) 1 dy compensation to, or pay of reimburse the expenses of a discount of the discount of th	1	1	l
		1	1	1
	The definition of disc of a disqualified personly	1		1
	(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 penod after termination of overgreent covers.	1	i	
		i	1	1
t		1	}	
	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 (see page 20 of the instructions)?	-		ļ.,
		1b	١-,	D
c		1	,	ľ
		1	·	1:
	Taxes on failure to distribute income (section 4942) (does not apply for years the organization was a private operating foundation defined in section 4943) or 4040(3).	1c	-	ĮΧ
		1		
1	At the end of tax year 2005, did the proporation become	}		1
		1		
	" 'co, list the years > 20 20 20 =	1		
3	Are there any years listed in 2a for which the account	1		
	(relating to incorrect valuation of assets) to the year's undistributed incorrec? (If applying section 4942(a)(2) to all years listed, answer "No" and attach statement are a property of the year's undistributed incorrec? (If applying section 4942(a)(2))	L	1 1	
	to all years listed, answer "No" and attach statement—see page 20 of the instructions.) If the provisions of section 4942(a)(2) are being applied to accomplish the provisions of section 4942(a)(2) are being applied to accomplish the provisions of section 4942(a)(2) are being applied to accomplish the provisions of section 4942(a)(2) are being applied to accomplish the provisions of section 4942(a)(2) are being applied to accomplish the provisions of section 4942(a)(2) are being applied to accomplish the provisions of section 4942(a)(2) are being applied to accomplish the provisions of section 4942(a)(2) are being applied to accomplish the provisions of section 4942(a)(2) are being applied to accomplish the provisions of section 4942(a)(2) are being applied to accomplish the provisions of section 4942(a)(2) are being applied to accomplish the provisions of section 4942(a)(2) are being applied to accomplish the provisions of section 4942(a)(2) are being applied to accomplish the provisions of section 4942(a)(2) are being applied to accomplish the provisions of section 4942(a)(2) are being applied to accomplish the provisions of section 4942(a)(2) are being applied to accomplish the provisions of section 4942(a)(2) are being applied to accomplish the provisions of section 4942(a)(2) are being applied to accomplish the provisions of section 4942(a)(2) are being applied to accomplish the provision and the provision and the provision accomplished to accomplish the provision and the provision accomplished to accomplished to accomplish the provision accomplished to accomplish the provision accomplished to accomplish the provision accomplished to accomplishe	2b		7
	If the provisions of section 4942(a)(2) and being applied to any bit the years listed in 2a, list the years here. 20 , 20 , 20 , 20		-	_
		[]		
	Did the organization hold more than a 2% direct or indirect interest in any business enterprise at any time during the year?			
	*** Yes No	1		
•	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 1960 (2016) as a result of (1) any purchase by the organization			
	or disqualified persons after May 26, 1969; (2) the laces of the 5-year period (or longer period approved by the Commissioner under section 40/2(3/2) it is	1 1		
	the large of the 10- 15 are 20 ward to 15 dispose of holdings acquired by gift or bequest; or (3)	1 1	- 1	
	if the organization had excess business helders in 2005.			
	Did the organization invest during the year any amount in a manner that would jeopardize its chantable purposes? Did the organization make any investment in a manner that would jeopardize its chantable purposes?	3ь		_>
		4a	-	_?
				٦;
		4b	-	_2
	(1) Carry on propaganda, or otherwise attempt to influence legislation (see that 10.45) in [7]		-	
	(2) Illinucities the outcome of any specific public closures (a)		- [
			- 1	
	to record a grant to an individual for travel, study or other similar purposes?		- 1	
	(4) Frovide a grant to an organization other than a chantable atc. amount to an organization other than a chantable atc.		- {	
	11 Section 505(a)(1), (2), or (3), or section 4940(d)(2)?		- 1	
	(a) Flovide for any purpose other than relegious charteles	{	- 1	
	concentrate purposes, of for the prevention of cruelty to children or an investor.			
	in any answer is 165 to 5a(1)-(5) (fid any of the transactions fail to accuse the second		. 1	
		5b		$\tilde{\chi}$
		7	-	4
	ax because it maintained exponents. does the organization claim exemption from the	- [- 1	
i	f "Yes," attach the statement required by Regulations section 53.4945-5(d).	1	- 1	
	Old the organization steer at	- 1		
•	Oid the organization, during the year, receive any funds, directly or indirectly, to pay	- 1	- 1	
ί	old the organization, during the year pay propulate describing the search of the control of the			
į	you answered "Yes" to 6b, also file Form 8870	6b		λ
	- Com our	- 1	- 1	

•							
Form 990-PF (2005)							Page
Part VIII Information About Officers, Dire and Contractors	ectors	, Trustees,	Foun	dation Ma	nager	s, Highly Paid	Employees.
List all officers, directors, trustees, foundations							
(a) Name and address			(c) Cc	mpensation	(d)	Contributions to	(a) Expanse assure
	devot	rs per week ad to position	(n not	mpensation paid, enter -0-)	and def	Contributions to type benefit plans erred compensation	(e) Expense account other allowances
	-						
						_	
				i			
2 Compensation of five highest-paid employee If none, enter "NONE."	es (othe	er than those	inclu	ided on line	1-se	e page 21 of the	ne instructions).
(a) Name and address of each employee paid more than \$50	,000,	(b) Trtle and a hours per w devoted to po	verago veek asition	(c) Comper	sation	(d) Contributions to employee benefit plans and deferred compensation	(e) Expense account other allowances
NOWE	-+					compensation	
				<u> </u>			
				0			
			$\overline{}$	1-1-			
			O_{Γ}	\			
		. (\mathcal{I}		1		
Total number of other employees paid over \$50,000)	- (<u> </u>					>
3 Five highest-paid independent contractors to "NONE."	r profé	sgional serv	ices—	(see page	21 of ti	he instructions). If none, enter
(a) Name and address of each person paid mon					Type of		
None (\mathcal{I}_{\sim}				typs or	Set vice	(c) Compensation
						- ' -	
	•••••					\neg	
otal number of others receiving over \$50,000 for pr	ofessio	nal services	٠				. 🖈
Part IX-A Summary of Direct Charitable Ac							
List the foundation's four largest direct chantable activities during of organizations and other beneficianes served, conferences conv	the tax y	rear include rete scorch papers pe	vant sta	distical informa	tion such	as the number	Expenses
1 None							
2							
***************************************				· • • • • • • • • • • • • • • • • • • •	··· ···		
3							
3							

Part IX-9 Summary of Program-Related Investments (see page 22 of the instruction Describe the two largest program-related investments made by the foundation during the tax year on less 1 and 2	is)	
1	-	
		Am
2	······	
2		
2		

All other program-related investments. See page 22 of the instructions		
3		
***************************************		1
Otal Add Impact III		
otal. Add lines 1 through 3		
Part X Minimum Investment Return (All J		
Minimum Investment Return (All domestic foundations must complete this page 22 of the instructions.)		
1 Fair merket volument	art. For	eign tounda
1 Fair market value of assets not used (or held for use) directly in carrying out charitable, etc purposes;	- 1	
purposes; and any in carrying out charitable, etc	:	1
a Average monthly fair market value of secunties.		1 1-
	ta	1 0
C Fair market value of all other	1b	<u> </u>
d Total (add lines 1a, b, and c). Reduction claimed for blockers and the instructions)	1c	
	1d	
To (attach detailed explanation) . Acquisition indebtedness applicable to the 1 course.	1 40	
Acquisition indebtedness applicable to line 1 assets		1
	2	
	3	
of the instructions) Net value of propharitable activities. Enter 11/2% of line 3 (fo greater amount, see page 23	1	1
	4	ļ
Minimum investment return. Enter 5% of line 5	5	
	6	
foundations and certain foreign organizations checks here ▶ and do not complete this p	private	operating
Minimum investment return from Part X, line 6.		
	1	$-\alpha$
this does not include the tax from Part (II)	⊣ :	
	2c	
Distributable amount before adjustments Subtract line 2c from line 1	3	
Recoveries of amounts treated as qualifying distributions Add lines 3 and 4	4	
	5	
Deduction from distributable amount (see page 24 of the instructions) Distributable amount as adjusted. Subtract tine 6 from the 5	6	
ine 1	-	
Taylor Commence and on Part Alli,	7	
t XII Qualifying Distributions (see page 24 of the instructions)		
Amounts noud (natural		
Amounts paid (including administrative expenses) to accomplish charitable, etc., purposes:		
Expenses, contributions, gifts, etc.—total from Part I, column (d), line 26 Program-related investments—total from Part IV P	1a	
Program-related investments—total from Part I, column (d), line 26 Amounts paid to acquire assets used (or held for use) the visit of the part I/I.	16	
Amounts paid to acquire assets used (or held for use) directly in carrying out charitable, etc.,	1-4	
purposes	2	
Amounts set aside for specific chantable projects that satisfy the:	-	
Surtability test (pnor IRS approval required) Cash distribution test (attach the required schedule)	3a	
Cash distribution test (attach the required schedule) Qualifying distributions. Add lines 1a through 3h. Foter have and an Death.	3b	
Qualifying distributions. Add lines 1a through 3b. Enter here and on Part V, line 8, and Part XIII, line 4 Organizations that qualify under section (0.00c) for the	4	
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 reduced rate of tax on net investment	F-	
income. Enter 1% of Part I, line 27b (see page 24 of the instructions)	5	
Adjusted qualifying distributions. Subtract line 5 from line 4 Note: The amount on line 6 will be used in Part V, column (b), in subsequent years when calculating qualifies for the section 4940(e) reduction of tax in those years.	6	
Note: The amount on line 6 will be used in Part V, column (b), in subsequent years when calculating qualifies for the section 4940(e) reduction of tax in those years.	<u> </u>	

_	art XIII Undistributed Income (see pag	e 24 of the in	structi	ons)				Pa
1	Distributable amount for 2005 from Part XI,	(a) Corpus		(b) Years prior to 2	004	(c) 2004	7	(d) '005
	Undistributed income, if any, as of the end of 2004	 	- "	1			 	
a	Cities amount for 2004 only	1		8				
b	Total for prior years: 20 20 20			<u> </u>				
a	Excess distributions carryover, if any to 2006	•		4487 75	+-			·
a b	From 2000	_	- 1	A	4		1.	•
	From 2002	⊣ ~ ~	- [N 442 4 12.	1		1	٠.
ď	From 2003	–Մու	200	4	. 4	٠,	1.	
•	From 2004 .	- 1. gr 3	ş-	1 to 1	3. 3	ž		٠,
F	Total of lines 3a through e.			清 調報 第			1.7	٠.
	Qualifying distributions for 2005 from Part	No.	*\%	411	* * *	+	· S.F.y	, .
	^II, III E 4: F \$	1 2 3	85. T		100		1 . N 2	
	Applied to 2004, but not more than line 2a Applied to undistributed income of prior years	1 34 1. 10	- 35	7. 66 mm		38.	, Th. 31	, f
	(Circulate Page 1999 50 of the Instruction of	1. 14 .	T.		S	1 de .	:12.4.	1 1
	Treated as distributions out of corner of the	± ; 3	E	3 Ber		Stor Hilliams	CITAL .	
			1	化特层化	1 1	the Tax	* *** **	į įs
	Applied to 2005 distributable amount	1 Sec	137	The Die	4) (1 - 8	19	ACSG.	- i
	Remaining amount distributed out of corpus	ļ		图2.4 圖	現	72.	- Wi	þ
	Excess distributions carryover applied to 2005 (If an amount appears in column (d), the	**b > 360	- 1	18 18	· 」版	私 撒		
	same amount must be shown in column (a) 1	1. 雪嘴鹭		万]括 "其	上端	** 華	- 4	£ 1
	enter the net total of each column as	w 18 1	(4)	ノ縄・戦	. S. S	雅 "	1.	7.0
	murcated below;		ŲΨ	机 薩門	7	A The C	Tan.	104
	Corpus. Add lines 3f, 4c, and 4e Subtract line 5	\bigcap_{A}	J 14	* T	The state of	10. 15%	"噻	
i	Prior years' undistributed income. Subtract ine 4b from line 2b	Pro Ve			122-	723	F2.	- 3
		1 3 av	t _e		在 古	, <u>a</u>	. *	
- 14	Enter the amount of prior years' undistributed income for which a notice of deficiency has		基		1	100	· 184	1
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ь	foundation, and the ruling is effective Check box to indicate whether the or	f con-	i letter that it is a	private operating	i	
2a	Enter the lesser of the adjusted net	Tax year	are operating tour	dation described in	section 🔲 4942(j)(3) or 🔲 4942(j)(5
	income from Part I or the minimum investment return from Part X for each	(a) 2005	(b) 2004	Prior 3 years		(e) Total
	year listed	17.555	(0) 2004	(c) 2003	(d) 2002	(0) 10(8)
b	85% of line 2a			 		
С	Qualifying distributions from Part XII,		 			
	line 4 for each year listed		(1	1	
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.			1 1		
	"Assets" alternative test—enter.]		
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ь	under section 4942(j)(3)(B)(i) "Endowment" alternative test-enter 24				ļ	
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	and 5 or more exempt	L	\ \O			
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	efore the close of any tax year (but	only it titey have	contributed more	than \$5,000). (Se	e section 507(d)(2)	.)
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*11	ne name, address, and telephone nu	mber of the pers	on to whom appl	ications should be	addressed:	
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	e form in which applications should	be submitted an	id information and	d materials they sh	ioniq iucinde.	
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An	y restrictions or limitations on awar itors:	ds, such as by	geographical are	as, charitable field	s, kinds of institu	tions, or other
_					Form	990-PF (2005)

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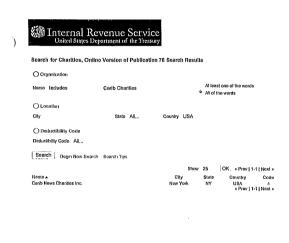
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	Unrelated bus	iness income	Excluded by cody	on 512, 513, or 514	
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g Fees and contracts from government agencies					
Membership dues and assessments . Interest on savings and temporary cash investments	<u> </u>				
Dividends and interest from securities			 		
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b Not debt-financed property					
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Oddi Ui (1955) IfOM Sales of accete other than inventor.					
Gross profit or (loss) from sales of inventors					
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	Part XVII	Information Regarding Transfers To and Transactions and Relationships With Noncharitat Exempt Organizations	ble
	1 Did the o	organization directly or indirectly engage in any of the following with any other organization described in section Yes N	10
	a Transfer	of the Code (other than section 501(c)(3) organizations for as ection 527, relating to political organizations? Is from the reporting organization to a nonchantable exempt organization of:	_
	(i) Casi	10(3)	
		er assets	—
	b Other tr	ransactions:	_
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	(3) Rent	tal of facilities, equipment, or other assets	
	(4) Heirr	nbursement arrangements	_
	(5) Loan	ns or loan guarantees	
	(0) 2011	Ormance of services or membership or fundamental and a	_
	d If the an	of facilities, equipment, mailing lists, other assets, or paid employees 1c	_
	market v received	nswer to any of the above is "Yes," complete the following schedule. Column (b) should always show the fair mark the goods, other assets, or services given by the reporting organization. If the organization received less than faulte in any transaction or shaning arrangement, show in column (d) the value of the goods, other assets, or service.	et air es
	(a) Line no (b) A	smount involved (c) Name of nonchantable exempt organization (d) Description of transfers, transactions, and sharing arrangements	
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		ganization directly or indirectly affiliated with, or related to, one or more tax-exempt organizations d in section 501(c) of the Code (other than section 501(c)(3)) or in section 527?	_
		complete the following schedule.	
		(a) Name of organization (b) Type of organization (c) Description of relationship	_
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Search for Charities, Online Version of Publication 78 Search Results

Page I of I



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Deductibility Code Page 1 of 1



Deductibility Code

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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.

I	Code	Meaning
	4	A private foundation, generally with a 30% deductibility limitation.

Close

09-6333 0107.2

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EXHIBIT 9

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:

- 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 13^{th} Annual Caribbean Multinational Business Conference in 2008.
- 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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Office of Congressional Ethics

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

- She first attended the conference in 2004, as a participant, to see if the conference would be a good fit for IMB to participate at as a sponsor.
- 5. IBM was an entry level sponsor in '05.
- 6. She dealt with Faye Rodney on conference matters.
- 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.
- 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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Office of Congressional Ethics

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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.
- 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.

IBM MOI - Page 3 of 5

Office of Congressional Ethics

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

- 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.

IBM MOI - Page 4 of 5

Office of Congressional Ethics

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

- 45. Her registration fee was part of the sponsorship. She paid for her room and all travel costs.
- 46. There were less that 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

IBM MOI – Page 5 of 5

Office of Congressional Ethics

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EXHIBIT 10

Susan A. Sullivan Verizon Foundation Director – Strategic Planning & Partnerships



Verizon Faundation One Verizon Way Bidg 6, 3rd Fir 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

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Enclosures

cc: Patrick Gaston Albert Browne

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Anita Coleman-Hunt Verizon Foundation One Verizon Way, VC63S427 Basking Ridge, NJ 07920

Talephone: 908-559 Fax: 908-630-2660

09-6333 0118

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.

1.1 hereby acknowledge the Verizon Foundation 2008 contribution of:

Fax: 908-630-2660

for 13th Annual Multi-National Business Conference - November 6-9, 2008. (or describo property or services other than money received) Received on (date): 11/2.6/08 Date of check: 11/21/08 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, tickot or entertainment at a fundraising event):
 Yes _____No If YES, phase describe whel 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 fall to make the required disclosure or for making a disclosure that is inaccurate or incomplete. Name: KARL B. RODMEY PUBLISHER /CEO Organization: Carib News Charities, Inc. Organization Tax I.D.#: 133632050vz Signature: Date: Please return to: Anita Coléman-Hunt Verizon Foundation One Verizon Way, VC63S427 Basking Ridge, NJ 07920 Telephone: 908-559-

09-6333 0119

EXHIBIT 11

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

Verizon 1 MOI -- Page 1 of 5

Office of Congressional Ethics

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

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 I 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

Verizon 1 MOI - Page 2 of 5

Office of Congressional Ethics

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended 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.
- 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 I 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 I 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 I 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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Office of Congressional Ethics

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

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, 2rd 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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Office of Congressional Ethics

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

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

Verizon 1 MOI - Page 5 of 5

Office of Congressional Ethics

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EXHIBIT 12

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:

 Representative 2 of the Verizon Foundation was given an 18 U.S.C. § 1001 warning, signed a written acknowledgement of the warning

Verizon 2 MOI - Page 1 of 7

Office of Congressional Ethics

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

- 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.
- 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.
- 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.
- 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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Office of Congressional Ethics

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

- 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.

Verizon 2 MOI - Page 3 of 7

Office of Congressional Ethics

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

- 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.

Verizon 2 MOI - Page 4 of 7

Office of Congressional Ethics

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

- 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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Office of Congressional Ethics

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

- 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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Office of Congressional Ethics

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

Verizon 2 MOI - Page 7 of 7

Office of Congressional Ethics

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EXHIBIT 13

Mar 10 09 04:3/p

vv.L. McKenzie

770-971-0000

p.:



Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10018
Tel: (212) 944——: Fax: (212) 944-2089
E-mail: @@caribnewsconference.com

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.



Organized by Carib News Foundation. A non-profit project 501-C3 corporation

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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

Long Or Koday

Karl B. Rodney Publisher/CEO

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Invoice

CARIB NEWS INC.

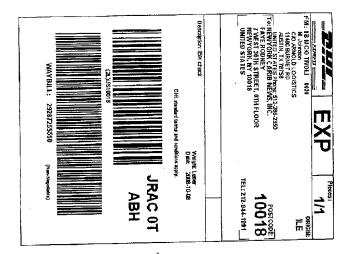
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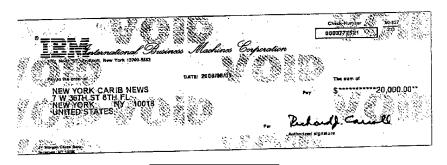
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EXHIBIT 14

Ø 002

May 15, 2009

MEMORANDUM

VIA FAX TO: 202-226-0997

TO: FROM: Omar Ashmawy Will Ris

DE.

Materials related to Carib News Foundation Conference

At your request, I am faxing you the following documents:

- 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 <u>listing of the 10 tickets that we provided</u>. 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.

Ø1003



Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10018
Tel: (212) 944 Fax: (212) 944-2089
E-mail: @Caribnewsconference.com

June 6, 2008

Mr. Will Ris Senior Vice President Government Affairs American Airlines 1101 17th Street, Suite 600 Washington, DC 20036

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 Caribhean 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

05/15/2009 17:20 FAX

Ø 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: @nycaribnews.com or (212) 944-

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: 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 <u>designated sponsor</u> of a main event and/or 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.
- <u>Maximum of thirty-five (35) first-class roundtrip tickets</u> from the 48 contiguous United States to Antigua.
- <u>Maximum of five (5) coach class tickets and five (5) first class tickets</u> to be used for site inspection and conference planning prior to the
- 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.

Ø 006

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EXHIBIT 15

Lobby Disclosure Search

Page 1 of 3

Lobbying Disclosure

Office of the Clerk, United States House of Representatives

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House ID	Registrant Name	Client Name		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

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		(IBM)	(IBM)			
	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)	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
i	311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2008	4th Quarter	Caine, Christopher
į	311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)		2009	1st Quarter	Edington, PJ
;		Corporation (IBM)	International Business Machines Corporation (IBM)	2005	Year- End	Caine, Christopher
4	01290000	QA Internal Test - New Database IBM	QA Internal Test - New Database IBM	2008	1st Quarter	None
:	01290000	QA Internal Test - New Database IBM	QA Internal Test - New Database IBM	2008		Last Name 01, First Name 01
4	01290000	QA Internal Test - New Database IBM	QA Internal Test - New Database IBM	2008	3rd Quarter	None
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310520000 CITIG	ROUP, INC	CITIGROUP, INC	2007	Mid-Year	Burgeson, Christine	
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355240000 CITIZE	ENS COAL COUNCIL	CITIZENS COAL COUNCIL	2007	Mid-Year	None	
355240000 CITIZE	ENS COAL COUNCIL	CITIZENS COAL COUNCIL	2007	Year-End	None	
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355240000 CITIZE	ENS COAL COUNCIL	CITIZENS COAL COUNCIL	2008	2nd Quarter	None 🖖	
355240000 CITIZE	ENS COAL COUNCIL	CITIZENS COAL COUNCIL	2008	3rd Quarter	None -	
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316720000 CITIZE	ENS COMMITTEE FOR THE TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2007	Mid-Year	Snyder, John	

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373Z70000 CITIZENS FINANCIAL GROUP, INC.			Mid-Year	Robinson, Ken
373770000 CITIZENS FINANCIAL GROUP, INC.	CITIZENS FINANCIAL GROUP, INC.	2007	Year-End	Robinson, Kenneth .
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EXHIBIT 16

09-6333 0154



BASIC REQUIREMENTS TO HOST

GARIBBEAN 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 participates 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
 - 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 CARIB NEWS to members of the US Congress, other Prime Ministers and Ministers of Government.
- Participate in the Forum with Members of Congress.
- · Arrange fours and activities of interest for VIP's and/or their spouse.

09-6333 0155



August 13, 2008

The Hon. Sarah A. Wescott-Williams Leader of Government Government Administration Building Clem 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 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

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 LaBega Marla Chemont

Taking Our Rightful Place In The Sun

09-6333 0156 CN-000040

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Carib News Foundation 7 West 36th Street, 8th floor, New York, NY 10017 Tel: (212) 944 Yax: (212) 944-2089 E-mail:

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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09-6333 0157

2008 CARIBBEN MULTI-NATIONAL BUSINESS CONFERENCE

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

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 Marlin.

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

- 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

09-6333 0158



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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 Wescot-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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February 8, 2008

Commissioner Sarah Wescot-Williams Leader of Government Business Government Administration Building Clem Labega Square Philipsburg, St. Maarten, NA

Dear Commissioner Wescot-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 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 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,

Faye A. Rodney

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President

Karl B. Rodney

Publisher/CEO

cc. Marla Chemont, Marketing Assistant

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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 sororities 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 Ouenniche 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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vv.L. McKenzie

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Tel: (212) 944-2089
E-mail: <u>beartbnewsconference.com</u>

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.



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We would be happy to answer any questions you might have or to fill in any detail. I can be reached by e-mail: **\text{\psi_nvcaribnews.com}\$ or (212) 944***.

Thanks for your kind consideration.

Best regards,

Faye A. Rodney President

*0/

Karl B. Rodney Publisher/CEO

(4)

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war то ов о4;зэр - vv.L. мскепав

110-011-0000

Date 7/16/2008 Invoice Invoice #

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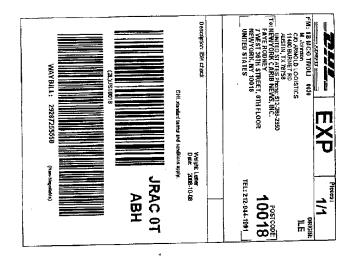
CARIB NEWS INC.

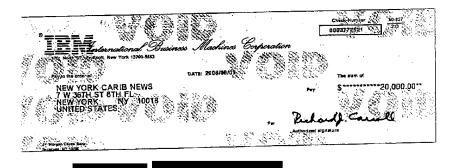
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Wanda McKenzie IBM 2607 Jesters Court Marietta, GA 30068	

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EXHIBIT 17

09-6333 0166

rage r or-

```
Registration
                 plouis ( @ @nycaribriews.com)
Monday, October 15, 2007-13:00 AM
      From:
     To:
                     'Kelly Mobley, Dawn'
     Subject: RE: Carlb 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, 9th Floor
New York, NY 10018
——Original Message
From: Kelly Mobiley, Dawn [mailbotDawn.KellyMobiley@mail.touse.gov]
Sent: Honday, October 15, 2007 10(25 Am
Tot plouis
Subject: FW: Carib News - Pre-trip Approval Issues
              FΥ
              From: Cleon, Sušān
Sens: Aršey, October 12, 2007 2:e1 PM.
To: plouls
Car Kelly Mebley, Dawa; Ditkelily, Bill
Subject: RE: Carlis News - Pre-trip Approval Issues
```

Please explain in more detail your small 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 rounding air transportation costs; lodging costs, meal costs, cost of a particular meal or reception, etc.?

Antigua Government
Sandats
Royal Carlibbean Bakery
CITI
Pfizer
Macy's
AT&T
HBBC
IBM

IBM

10/15/2007

09-6333 0167

CONFIDENTIAL

Supply for 4

- Goodworks International Preferred Health Partners Antigua & Barbuda American Airlines
- o.
- Golden Krust

Susan L. Olson

Counsel

House Committee on Standards of Official Conduct

HT-2, The Capital Building Washington, DC 20515

Phone: 202-225-7103

Fax: 202-225-7392

From: plouls [mullio] Onycar|bnews.com]
Sent Thursday, October 11, 2007 10:37 AM
To: Olson, Susan
Subject: RE: Carlb 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.

Federally registered lobbyists or foreign agents will not be accompanying the Mambers of participating in the program,

Regards

Patricia Louis
Executive Assistant
CARIB NEWS
7 West 28th Street, 8th Floor
New York, NY, 10018
- Ordinal Message
Froms Olson, Susan [malto:Susan Olson@mail.house.gov]
- Senti Wednesday, Ostober 10, 2007 4:01 PM
- Tot
- Onycaribhews.com
- Cer Dawn, KellyMobley@mail.house.gov; O'Rellly, Bill

10/15/2007

09-6333 0168

CONFIDENTIAL

Subject: Carlb 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 entitles are "sponsoring" sessions, events, etc. during this trip:

a Antigua Government

- O. Sandals
- Royal Garibbean Bakery CITI
- o
- Pfizer
- Macy's AT&T HSBC Ö.
- IBM
- Goodworks International o
- Preferred Health Partners
 Antigua & Barbuda
- American Airlines 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 he 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 2008 annual impactal 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.

10/15/2000

09-6333 0169

CONFIDENTIAL

Page 4 of 4

Susan L. Olson

Counsel
House Committee on Standards of Official Conduct
HT-2, The Capitol Building
Washington, BC 20515
Phone: 202-225-7103
Fax: 202-225-7392

10/15/2007

CONFIDENTIAL

09-6333 0170



TEL: (212) 944- ; FAX: (212) 944-2089 E-MAIL ADDRESS: (AALL COM)

· ·	(a) A.T.T., N.B.T
· ·	FACSIMILE TRANSMITTAL SHEET
To/ Susan Olson	P. Louis
COMPANY: House Cice on Standards	DATE: /// 10/12/07
PAX NUMBER; 202-225-7392	Total no. of pages including cover.
RE: Trayel Certification	Form
Dungeny Degraeview	У Привави соммент Приванией Пубри местаного
PODINDATION.	U-the Conference is paid for by CARTB NEWS
The companies are partic of the trip and play no rol	lpants. They are not sponsors or co-sponsors for any parte in the planning or content.
The program has been an	recided to reflect the companies as Participants.
I regret the misunderstan grow through this process	ding and thank you for your patience as I go through and
I look forward to hearing:	from you.

09-6333 0171

CN-000057

CONFIDENTIAL

Regards

rage 1 01 4

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]

Sent: Friday, October 12, 2007 1:55 PM

plouis

Subject: RE: Confidential

The fax did not come through. Livill 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 ferms "sophat", "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 litherary 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: 'plouls' 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).

From: Olson, Susan Sent: Friday, October 12, 2007 9:29 AM To: O'Reilly, Bill; Kelly Mobley, Dawn Subject: FW: Carlb 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 entitles are cosponsors of the trip for purposes of the House travel rules. If that is the case and since it is likely that at legat 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

But, if you have a different interpretation of the below information from Ms. Louis, please do let 10/12/2007

09-6333 0172

CONFIDENTIAL

Page Z or 4

me know. Thanks! Susan

Susan L. Olson

Counsel

House Committee on Standards of Official Conduct

HT-2, The Capital Building

Washington, DC 20515 Phone: 202-225-7103

Fax: 202-225-7392

Ms. Olson,
In tesponse 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 lobbylst or foreign agent will be accompanying the Members participating in the program.

Regards

Patricia Louis
Executive Assistant
GARIB NEWS
7 West 36th Street, 8th Floor
New York, NY 40018
— Original Message
— From: Olson, Sugan [malko:Susan,Olson@mail.house.gov)
Sents Wednesday, October 10, 2007 4:01 PM
Toi — Onycaribnews.com
Cc: Dawn,KellyMobley@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

09-6333 0173

CONFIDENTIAL

Page 3 of 4

(Foundation) trip to Antigua, the issues involving sponsorship are as follows:

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

Antique Government

Sandals

- Royal Caribbean Bakery
- CITI Pfizer
- Ö. Macy's
- AT&T
- HSBC IBM
- Goodworks International
- Preferred Flealth Partners
- Aritigua & Barbuda American Airlines 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(o)(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

House Committee on Standards of Official Conduct

10/12/2007

09-6333 0174

CONFIDENTIAL

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HT-2. The Capitol Building Washington, DC 20515 Phone: 202-225-7103 Fax: 202-225-7392

10/12/2007

09-6333 0175

CN-000061

CONFIDENTIAL



TEL; (212) 944-2089
E-MAIL ADDRESS; @AOL.COM;

PAC	Simile transmittal sheet
TO: Dawn Kelly Mobley	FROM: P. Louis
COMPANY: Ethics Counsel for Cong: St Tubbs Jones	===
PAX NUMBER: 202-225-7392	total no. of pages including cover
RE: Travel Form	
⊔одовыт □токлячину :	Delease comment. Delease reply. Dyour 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 tole in the planning or confein.

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.

Llook forward to hearing from you.

09-6333 0176

CN-000062

CONFIDENTIAL

Registration

From: Thomas, Shelley [Shelley:Thomas@mall.house.gov]

Thursday, October 11, 2007 7:47 AM Sent

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 enswer and I already turned in Donna's forms.

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

contributor is given an

work of the Foundation. As a courtesy, each

is being presented.

opportunity to be attached to a part of the program that

They do not determine the content or the other

participants in the Conference, Please advise us.

Regards and Thanks

Patricia Louis Patriota Lovis
Executive Assistant
CARIS NEWS
7:West 36th Streat, Eth Floor
New York, NY 10018
— Original Message
From: Olson, Susan [mailto:Susan.Olson@mail.house.gov]
Sent: Wednesday, October 10, 2007 4:01 PM.
Total Sent Wednesday, October 10, 2007 0:01 PM.
Cet Dawn, Kelly Hobley @inall.house.gov; O'Rellly, Bill
Subject: Carib News - Pre-trip Approval Issues

Dear Mrs. Louist

With regard to the pre-trip approval requests for the Carlb News Foundation's (Foundation) trip to Antigue, 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 the the draft schedule, however, indicates that the following entities are "sponsoring"

09-6333 0177

CONFIDENTIAL CN-000063

Page 2 of 3

sessions, events, etc. during this trip:

- s, etc. during uns.mp. Antigua Government Sandals Royal Carlbbean Bakery ø
- ¢ CITI
- Prizer
- Macy's AT&T HSBC Ö œ,
- IBM
- Goodworks International Preferred Health Partners 6
- Antigoa & Barbuda Ö
- American Altlines
- Gölden Krust

Lastyear the Foundation provided the following information regarding these "additional sponsors" for the November 9 to 12, 2006 trip:

The Foundation, which is a \$01(a)(3) nonprefit organization, will be paying for the Members' travel expenses including transportation, meals, and lodging. The background materials for the Conference also incloate that the additional trip sponsors provide a "confribution 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. 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, Loannot proceed with the review of the pre-trip approval requests for the Foundation's Antigua trip.

Susan L. Oison

Counsel

House Committee on Standards of Official Conduct HT-2, The Capital Building Washington, DC 20515

Phone: 202-225-7103 Fax: 202-225-7392

09-6333 0178

CONFIDENTIAL

Page 1 of 3

Re: Carib News - Pre-trip Approval issues

Registration From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov] Sont: Wednesday, October 10, 2007 6:49 PM To: @nycarihnews.com Subject: Re: Carib News - Pre-trip Approval Issues Her question centers on whether any of these "co-sponsors" relains a lobbylst or foreign. This is the issue you and I focused on previously. It is a contral problem if any do and are paying for the ovents. If so, you are in the same position as last year with one-day events. Call Strap back toutorrow as early as possible. Hopefully, these co-sponsors don't retain debbyls is, but you should have their preventations on this matter. At a minimum, Macy's does, right? Alternatively if they are only sponsoring event tables or the like, a lobbylst will not be problematic. Sent Using BlackBerry Please see e-mall 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 CARIB NEWS 7 West 36th Street, 8th Floor Now York, NY 10018 09-6333 0179 CONFIDENTIAL CN-000065

ice. Canto trews - Pre-trip Approval issues

Page 2 of 3

Doar Mrs. Louis:

With regard to the pro-trip approval requests fur the Carlo News Foundation's (Poundation) trip to Antigua, the issues they olve poundation of the pro-trip approval requests for the carlo News Foundation of the pro-trip approval requests for the carlo News Foundation's (Poundation) trip to Antigua, the issues

While the sponsor form that you completed indicates that the Roundation is the sole sponsor of the 2007 trip, the draft schedule, however, indicates that the following entitles are "sponsoring" assessions, events, etc. during this trip:

- Antigua Government
- Sandals
- Royal Caribbean Bakery
- CITT
- o Pfizor
- Macy's
- AT&T
- o HSBC
- IBM
- Goodworks International
- Preferred Health Partners
- Antigna & Barbuda
- American Airlines
- 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(0)(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 "undetwrite the overall expenses of the Conference," primarily for meal expenses. These materials further provide that hoese 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

09-6333 0180

CONFIDENTIAL

Accordingly, you need to provide information describing the role of these "additional sponsors" as listed in the 2007 trip draft selecting for this current trip. Without such information, I cannot proceed with the review of the pro-trip approval requests for the Foundation's Autigus (tip.

4 44 - 1 - 1 - 1

Susan L. Olson Counsel House Committee on Standards of Official Conduct HT-2, The Cepitel Building Washington, 182 2013 Phone: 202-225-7103 Fax: 202-225-7392

10/10/2007

09-6333 0181

CONFIDENTIAL

, From: Shelley Thomas

γ.

Page 1 of 1



(Print) [Close)

"Thomas, Shelley" <Shelley. Thomas@mail.house.gov>
"Jumes, Corliss. <Corliss.James@mail.house.gov>, "Long, Keryri" <Keryn.Long@mail.house.gov>, "Chaplin, Jehnlo"
"Bishop, Mary. *Shelley. Thomas@mail.house.gov>, "Chaplin, Jehnlo"
"Jennie. Chippilmomail.house.gov>, "Chaplin, Jehnlo"
"Jennie. Chippilmomail.house.gov>, "Reinder. *Crysiah. Pickens@mail.house.gov>, "Hamletk, Dienell" <Estratara. Hamlett@mail.house.gov>, "Hamletkes, Jasper"
"Saper-Handricks@mail.house.gov>, "Shelley. Katel *Katel. Dalley.gomail.house.gov>, "Peather. Chaplin, James, Jasper"
"Chaleh. Murray@mail.house.gov>, "Shelley. Rate" <Estratara. Hamletter. Shelley. The Chaples. The C

To the CBC Members who sindicated a "yes" or "maybe" in attending the Carib News Youndation Business Conference in Antiqua, 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 latter than TURSDAY, October 9 to the Sthice Committee. I will be Bringing copies of the significates and submit to Pthice, to all of the Carib News had to committee and submit to Pthice, to all of the offices and cubmit to Pthice, the offices are the offices and cubmit to Pthice, the offices are the offices and cubmit to Pthice, the offices are the offices and cubmit to Pthice, the offices are the offices and cubmit to Pthice, the offices are the offices and cubmit to Pthice, the offices are the offices and cubmit to Pthice, the offices are the offices and cubmit to Pthice, the offices are the offices and cubmit to Pthice, the offices are the offices and cubmit to Pthice, the offices are the offices and cubmit to Pthice, the offices are the offices are the offices are the offices are the offices are the offices are the offices are the offices are the offices are the offices are the offices are th

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-half programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine now attachments are handled.

Attachment 1: 110th rule change page url (application/octet-stream)

http://webmail.att.net/wmc/n/wm/47056C17000D0D2F00002DBD2160376223059C0A0B., 10/4/2007

CONFIDENTIAL

09-6333 0182

Travel Guidelines, Regulations, and Forms

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Page 1 of 1

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 sponeous. Regulations, forms, and instructions governing privately-sponeous i travel taking place after March 1, 2007, are available below. An Advisory Memorandum providing additional guidance regarding travel-was released of 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 Torm 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

<u>Please note:</u> Both the Private Sponsor Certification <u>and</u> the Member/Officer/Employee Traveler Porins 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 5 (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 like 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 of tariff benefit to provide certain information regarding the request and its purpose to the commissioner of installation. An Advisory Memorandum providing guidance in this matter was released on March 27, 2007.

09-6333 0183

CONFIDENTIAL

Page 1 of 1

Travel-Approval Forms for Antigua Trip

Registration From: Smith, Hillary [Hillary.Smith@mail.house.gov] Sent: Thursday, October 04, 2007 4:32 PM To: @nycaribnews.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 Carlo News' Annual conference. The revised forms, along with the list of findless, should be sent to each invites 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 HT-2, The Capitol Washington, DC 20515 202-225-7103 10/4/2007 09-6333 0184 CONFIDENTIAL CN-000070

Registration

From: Kelly Mobley, Dawn [Dawn KellyMobley@matthouse.gov]

Sent: Wednesday, October 03, 2007 2:02 PM

To: plouls

Subject: RE: Please read quoty below

iguore the last email b/c we are working to meet the 50-day submission. Just stand by so we can get back in touch today, have it all resolved fomorrow, 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 accigned your review to Staff Attorney Suban Olson, Please reach her by phone at 202/226 the next week if she has not reached out to you. She will need a few days of review. Thank you very much.

The Conference dates are November 8-41, 2007; and opens on Thursday November 8 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 <u>NOT the SPONSOR</u>, consequently lessume the information contained in that Item will have to be changed.

Awaiting your advice.

Regards

Particle Louis
Executive Assistant
CARIB NEWS:
7 West 36th Street, 8th Floor
New York, NY 10018
——Ofighal Message——
From: Kelly Mobiley, Dawn [mailto:Dawn.KellyMobiley@mail.house.gov]
Sent: Monday, October 01, 2007 5:10 PM

10/3/2007

09-6333 0185

CONFIDENTIAL

Page 1 of 2

Registration

From: plouis @mycaribnews.com Monday, October 01, 2007 6:40 PM Sent: '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.

Ifem No. 12. The companies like Pfizer, AT&T are donors/contributors of grants to the Foundation for educational purposes and <u>NOT the SPONSOR</u>, consequently leasume the information contained in that item will have to be changed.

Awaiting your advice.

Regards

Fromt Kelly Mobley, Davin Sant: 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 mailtor.

From: Kelly Mobley, Dawn Sent: Tuesday, September 25, 2007 12:42 PM To: /plous

09-6333 0186

10/1/2007

CN-000072

CONFIDENTIAL

Please forward the paperwork as well to the Chairweman's personal office so her scheduler can complete the work from that office. Please get it to Lalla King today, Her fax number is 202/225-1339. She has to complete the Member's forms and meet the same deadline.

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/centributors of grants to the Foundation for educational purposes and <u>NOT the SPONSOR</u>, consequently I assume the information contained in that item will have to be changed.

Awalting your advice,

Regards

Rafricia Loide
Executive Assistant
CARIB NEWS
7 West 36th Street, 8th Floor
New York, NY 10018
——Original Message
From: Kelly Mobiley, Dawn [mailto:Dawn.KellyMobley@mail.house.gov]
Sent: Monday, October 01, 2007.5:10 PM
To: plouis
Subjects RE: Please read query below

09-6333 0187

CONFIDENTIAL

Page 1 of 2 Registration Kelly Mobley, Dawn [Dawn KellyMobley@mail.house.gov] Sent: Monday, October 01, 2007 5:10 PM plouls Subject: RE: Please read query below From: Kelly Mobley, Dawin 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 Mobiley, Dawn Sent: Tuesday, September 25, 2007 12:42 PM To: Iplouis' Subject: Query ham working through your forms before leaving them with our staff attorney and have a question. Query: Why did you not list GARIB NEWS as the sponsor as you'd indicated instead of Macy's, etc. The official sponsor for travel, lodging, and planning is still Carlb News, correct? From: Kelly Moßley, Dawin Sent: Tuesday, September 18, 2007 12:57 PM To: Joluls Subject: RE: Draft Program - 2007 pusiness Conference (No agenda or program attached) When you send the draft agenda, please also forward any information on your sponsor's status. Whe cannot be a lobbylst. Do you need a copy of the new travel rules? Erom: Kelly Mobley, Dawn Sent: Monday, September 17, 2007.5:53 PM To: 'alouis'. Subject: RB: Draft Program - 2007Business Conference Nothing was attached to this small. Therefore, we have not received the proposed agenda you mention below and have nothing to proview. From: plauls [mailto: ponycaribnews.com]
Sents Monday, September 17, 2007;3:47-PM
Tot Kelly Mobley, Davin
Subject: Draft Program - 2007Business Conference Ms. Mobiley: We spoke earlier re permission for Members to attend the Conforence and you asked for 09-6333 0188 10/11/0007

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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 draff for your guidance

Regards and Thanks

Patricia Louis Bacultive Assistant CARIB NEWS 7. West 36th Street, 8th Floor New York, NY 10018

09-6333 0189

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TEL: (212) 944-2089

E-MAIL ADDRESS:

@AOL.COM;

FACSIMILE TRANSMITTAL SHIERT

TO: FROM: PROVIS: Patricia Louis

COMPANY: DATE: 9/21/07

FAX NUMBER: TOTAL NO: OF PAGES INCLUDING COYER: 202-225-7392

RE: SPONSOR FORMS

DEGERRAL SECONMENT STREET ST

Following is a completed form for your advisement /review/comments.

Regards

09-6333 0190

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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 S. 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 spouser should:NOT submit the form directly to the Committee.

Privale sponsors are urged to submit this form to each House-invitee at least 30 thijs 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 frip. The submission of an incomplete form will dolay the review process. Before completing this form, positions are urged-to completingly twice with Committee's private travel, adelines 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 abmitting the form. Please type form.

Successful to the call the parties for the trip.

Sponsor(s) (Who will be paying for the trip):
I represent that the trip will not be financed (in whole or in part) by a secterally-registered lobbylst or a registered foreign agont (signify, "yes" by checking box).
I represent that the trip sponsor(s) has not accepted from any other source funds cannarked directly or indirectly to finance any aspect of the trip (strainfy "yes" by checking box).
Is travel being offered to an accompanying family member of the Housednvitee(s)? 🗹 Yes 🔻 🗸 No.
Provide manies and titles of ALL House invitees; for each invites, provide explanation of why the individual was invited (include additional pages if necessary): each top to senative spouse is invited or one family member.
Dajes of travel.
Varies depending on member Cities of departure destination tetum:
Attached is a dotailed agouda of the activities taking place during the travel (i.e., an hourly description of planned activities) (signify "yes" by checking box);
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 liquestion Act of 1965; The first process of the trip does not retain or employ a federally registered lobbyist or registered foreign agent: A grace of the trip does not retain or employ a federally registered lobbyist or registered foreign agent: A grace of the trip is for attendance at a one-day event and hobbyist involvement in planning, organizing, requesting, or arranging the trip was de nutripute under the Committee's travel regulations. I. If travel is for participation in a one-day event (d.e., if you decked Question 9(c)), check one of the following: a, One-hight's lodging and meals are being offered: I or b. Two-night's lodging and meals are being offered: II

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 If the trip is not sponsored by an institution of higher education, I represent that a flederally-registered lobbys or foreign agent will not accompany House Members or employees on any segment of the trip (signify "yes" b 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. Pilizer-Education/Health AT&T and IBM's provide technology to the region. MACV's - cooks new vendor sources. Calibanks opportunities
In the region.
13. Describe each spousor's organizational interest in the purpose of the trip: Economy class.
economy class.
17. Describe the type and class of the transportation being provided. Indicate whicher coach, business-class a flist-class transportation will be provided; in addition, for travel yis abstrait, please indicate it fravel is bein offered on a commercial diply, chartered flight or on an atrend operated or paid for by a currier not licensed but Reddent Aviation Administration to operate for companyation or hire (i.e., a private aircraft). If first-classics being provided, or if travel is via chartered or private aircraft, please provide an explaination describingly and travels.
Land the second
15. Trappesent that the expanditures rotated to local tries travel during the trip will be unrelated to personal referentional activities of the invitee(s). (signify "yes" by checking box): \(\subseteq\)
16. Trepresent that ofther (check one of the following):
a. This this involves an event this is arranged or organized without regard to congressional participation and the media provided to congressional participants are similar to these provided to or purchased by other event
b. The trip involves events that are arranged or organized specifically with regard to congressional participation
If The is checked, detail the cost per day of nicals (approximate cost may be provided):
 Reason for solecting the location of the event or trip: A Carlibbean country that has not previously hosted the conference.
18. Name of hotel or other lodging facility: Sandals Resent/Rex Hesort
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 ledging facility. Has appropriate meeting rooms
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alan and the product of the control of	nana alama da dia katan da ana ana ana ana ana ana ana ana an	high and high at a start that the start and an account of	The second secon	
Dactual amounts Egood faith estimates	Total Transportation Expenses per Participant	Total Lodging Expenses per Participant	Total <i>Meal</i> Expenses pe Participant 195	
For each Member,	320:	330	195	-
Officer, or employee				1
For each accompanying family member	320	o 	195	
				enti enti
	Other Expenses (dollar amount)	Identify Specific Nature of taxi, parking, registration	f "Ofher" Expenses (e.g.,	
For each Member, Officer, or employee	[(constraint and	taxi, parving, regionation	100,000)	1
For each accompanying family member	* <u></u>	:		
	dayan engelmanin tertamin era	1		-
22. Liepreson fürt folmbursom security costs, interpretor fi are necessary for the purpor	ces, visa application facs, s	nd similar expenses, will be	as travel to and from air	orts, I and
23. I certify that the information	n contained in this form is	rue, complete, and correct t	o the best of my knowled	go.
Signature:	- American - The Control of the Cont			طفيم
Name and title:				
Organization:				
Address:				
Telephone number:				
		-0.5		
Imall Address:				
The Committee staff may o	ontact the above individual	above if additional informa	tion is required.	
If there are any questions regard		it the Committee at the follo	wing address:	
Committee on Standards of U.S. House of Representati HT-2; The Capitol Washington, D.C. 20515	f Official Conduct	ot the Committee at the follo	vylug address;	
Committee on Standards of U.S. House of Representati	fÖfficiäl Conduct (ves	of the Committee at the follo	wing address:	
Committee on Standards of U.S. House of Representati HT-2, The Capitol Washington, D.C. 20515 (202) 225-7103 (pilone) (202) 225-7302 (general fa	fOfficial Conduct (ves x) vol approváls)	of the Committee at the folio	rying address:	
Committee on Standards of U.S. House of Represental HT-2. The Capitol Washington, DC: 20515-(202), 225-713-(10) no. (202), 225-713-(202), 226-7172 (fax for tra	fOfficial Conduct (ves x) vol approváls)	of the Committee at the folio	wing address:	
Committee on Standards of U.S. House of Representati HT-2, The Capitol Washington, DC, 20515 (202) 225-7103 (plione) (202) 225-7392 (general fa (202) 226-7172 (fax for tra	fOfficial Conduct (ves x) vol approváls)	of the Committee at the follo	rving address;	

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.
- I represent that the trip will not be financed (in whole or in pari) by a federally-registered lobbylst or a registered foreign agent. House Members and staff may not accept travel funded by a lobbylst or registered foreign agent, even when the lobbylst or foreign agent will be reimbursed by a client or employer.
- I represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to imance any aspect of the trip. All financial contributors to the trip must qualify as spousors 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 invites; for each invites, provide explanation of why the individual was invited. You must list every House Member and employee who is invited on the trip, thogether 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 invites'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 travelets 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 cittie unscheduled time and/or opportunities for recreational activities, even if such activities are at the personal expense of the invitees.

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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 US. and its territories; such entities should check box "n," regardless of whether they employ or retain a federal lobbyist or foreign agent. Builties of the than institutions of higher education that do not employ or retain a federal lobbyist or foreign agent should check box "h." Entities other than institutions of higher education that do employ of retain a registered lobbyist or foreign agent should check box "h." Entities other than institutions of higher education that do employ of retain a registered lobbyist or foreign agents may sponsor travel only for one-day events. For such trips, lobbyist involvement must be "de minima" 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 "o" 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 egents while traveling. This rule does not prohibit lobbyist or foreign agent participation in bitefings or meetings that occurs at the destination.
- 12. Private sponsors unit have a direct and immediate relationship to the purpose of the irip 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 esponsible for organizing the trip. Travel may not be accepted from an entity that merely contributes money towards the travel and is not officiries involved in planning or conducting the trip.
- Describe each sponsor's organizational interest in the purpose of the trip: Briefly describe
 the interest of 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 analged or organized without regard to congressional participation (e.g., annual meetings of business or trade associations), Members or amployees may accord the ineals 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.

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- 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 hole 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 loaging facility. Self-explanatory. Trip sponsors should not pay for a "package" that includes reoreational or enfortainment 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 todging facility. For events held without regard to congressional participation (e.g., annual meetings of business or trade associations, an entry such as "logation of annual trade association meeting" is sufficient. When the hip is held specifically for Members or staff, include rationale such as proximity to the site to be visited or to the adiport.
- 21. Total Expenses for Each Participant: Indicate whether the figures provided are actual principals of 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 airpoits, 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 mynted on the trip.

Version date 4/2007-Committee on Standards of Official Conduct

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U.S. House of Representatives

COMMITTEE ON STANDARDS OF OFFICIAL CONDUCT

October 27, 2006

Ms. Michele Rodney Carib News Foundation 7 West 36th Street, 5th Floor New York, NY 10018

Dear Ms. Rodney:

Talls responds to your letter requesting Committee gridance concerning the participation of House Members in the 11° Annual Caribboan Multi-Netional Business Contractors ("Conference") sponsored by the Carib News Foundation ("Foundation"), and other organizations. The combrence 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(0)(3) houprofit organization, will be paying for the Members' travel expenses including transportation, melals, and lodging. The background materials for the Conference also indicate that the additional trip reposers provide a "contribution to the overall pool of expenses in contribution to the [Foundation]," which is used to vinderwite the overall pool of expenses in contribution to the [Foundation], which is used to the Conference, primarily for mel 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 qualifor organizations confidency whether to office taxed expenses to flower Members and staff to contect our offices for information about the rules governing the seceptions of each 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 activity; opinioms to Members, officers, and employers regarding the graphicity of current or proposed conduct. We do not render each opinions to physics organizations. Farticularly in the case of travel, it is the dense of the conductive of the c

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According to your symulogion, the additional tris specifier similar Macy's, Jerk Oldas, Pfizer, Arrany, Goldon Kitut Penchlass, Arostonn Addinas, Citivach 1978, Fannay, City, and the Applible of Phinara.

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Ms. Michale Rodney October 27, 2006 Page 2

House Rule 25, clause 5 (the gift tale) permits a Member or employee of the House to accept from a private source (either than a registered liabilities or agent of a foreign principal) the decessary travel exponents to attend a meeting, speaking engagement, fact-finding trip, or similar event in connection with official duties, if the 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" exponent include expenses for transportation, longing, food, and refreshments, but they do not include expenditures for enterainment of recreational conviction.

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Generally, any getta that may be offered during the trip, tooluding any offer of colorisamment or reduced adjustly, 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 some days, excluding travel. House Members may also accept expenses to enable one foundly member to accomplany them on the trip, if offered by the first spenser. In addition, each Members may also accept expenses to enable one foundly member to accomplany them on the trip, must complete a Travel Disclosure and file this sum with the Clark of the House within 30 days after this meture. See House Rub 25, cl. 5(b)(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 Binancial Displayure, Studement under the Bellos in Government Act and Travels was Kulledon from forms, Members should indicate as the "trip spensors" all of the organizations that provided financial underwriting for the imp.

financial underwriting for the trip.

Because the trip will involve meetings with foreign government representatives and the trip aponents include the Republic of Parama and Panama City; it is important to make that government officials; including Menitheria and employees of Gongeass, are prohibited by Article 1; section 9; claims 8, of the United States Constitution from receiving "any present". I draw kind whatever "trops in foreign state or a representative of a foreign government without the consent of the Congress. In this Foreign Gifts and Decivations Act (C USC 8 7/342) (STODA*), Congress that consented in advance to acceptance of gifts of inveil or expenses for travel lost of the United States offered by a foreign government. Gifts of travel or expenses for travel include food, ledging, managorithous and eight content related to the official rule of a Member, officer, or employee. Congress has dest consented to the acceptance of gifts as a sourcest; or mark of contexts. State C 37/342(01)(A). Under this provision and implementing regulations issued by this Committee, the term "imitant" which "is defined as \$303. The ECDA also permits Mombers and scaff to accept a gift worth more than minimal value when refusal vioude cause offices or employees. Consense of the project of the United States and must be deposited with the Clark of the House. Any tangible gifts valued in excess of minimal value with or travel expenses of any value received from a foreign governments, in addition to the

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Ms. Michele Redney
Cotober 27, 2036
Page 3.

travel disclosure form described above. Copies of both forms are available on the Committee Web site.

Any House Membring invited to travel at private expesse should be encouraged to contest fails Committee's Office of Advise and Education at (202) 225-7103 if they have my 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 Adviso and Education at extension 5-7109.

Sincerely,

Doe Hastings
Chairman

Havail L. Reman;
Renking Minority Member

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Carib Neps Foundation
1 West 96th Street, 8th Shoor, Neps York, NY 10018
Yel: (212) 944-2089
E-muil: 22aribneviseonfurence.com

October 16, 2006

The Honorable Doc Hastings Chair Standards of Official Conduct Rm. HT-2, The Capitol Washington, DC: 20515

Via Fax: 202-225-7392 & US Mail

Dear Committee Chair Hastings:

As you might be aware, The Carlb News Foundation, orested to provide a forum for businesses from the United States to dislogue and establish business partnerships with communities in other parts of the world, has invited Members of Congress to participate in the $11^{\rm th}$ analyses are of the Carlbbean 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 follow 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 cum add in assisting their constituents to move towards a global exchange.

Sincerely,

Michele Rodney President Carib News Foundation

oe; Congresswoman Stephanle Tubbs-Jones

Organized by Carib News Foundation. A non-profit project 501-C-3 corporation

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Page 1 of 1

Registration

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, escurity, health, education etc.

The CARIB NEWS FOUNDATION does not rotaln or employ a registered lobbylet 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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9/21/2007

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Page 1 of 2

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mall.house.gov]

Sent: Wednesday, September 19, 2007 3:23 PM

piouis

Subject: RE: Draft Program - 2007Business Conference (No agenda or program allached)

Lastly, just send the sponsor form assp 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

Subject: RE: Draft Program - 2007Business Conference (No agenda or program attached)

I am mailing (US Postal) a copy of the official Giffs and Travol 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 omails.

From: Kelly Mobley, Dawn Sent: Wednesday, September 19, 2007 2:16 PM

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 travol. However, I need clarification on the official sponsor; that organization providing travol, lodging, and organizing the trip? Am I to assume it is CARIB NEWS? The official sponsoring organization must not retain or employ a registered tobleplate or golstored foreign agont (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 lust a moment. Please provide a fax number if that mothod of submitted will be inter helpful. If there is someone handling this matter, please provide me thoir 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 thereaffer 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 20616
2021226
From: Kelly Mobley, Dawn Dawn, Kellymobiey (grnaul:nouse:gov)

Sent: Tuesday, September 18, 2007 7:03 PM

To: @nycarlbnews.com

Subject: Re: Draft Program - 2007Business Conference (No agenda or program attached)

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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

When you send the draft agenda, please also forward any information on your sponsor's status. It'ne 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 montion below and have nothing to preview.

Ms. Mobiley:
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

Rogards 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

09-6333 0205

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 congleted by private cattices offering to provide travel or reinbursement for travel to House Members, officers or employees under House Rule XXV, clause 5. A completed copy of the form (and any statements) 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 twitee at least 30 days before I avel is scheduled to begin. The finiture 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 dela I the twiew process. Before completing this form, sponsors are urged to carefully review the Committee's private travel guidelines and advisory memorands 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 (rignif) "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): \mathfrak{A}
4.	Is travel being offered to an accompanying family member of the House invitee(s)? \overrightarrow{M} Y :5 \square No
5.	Provide names and titles of ALL House invitees; for each invitee, provide explanation of why the individua was invited (include additional pages if necessary): EACH REPRESENTATIVE'S SPOUSE
б.	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., ar hourly description o planned activities) (signify "yes" by checking box):
	Attached is a detailed agenda of the activities taking place during the travel (i.e., ar hourly description o
	Attached is a detailed agenda of the activities taking place during the travel (i.e., ar hourly description o planned activities) (signify "yes" by checking box): El I represent that (check one of the following): a. The sponsor of the try is an institution of higher education within the meaning of soution 101 of the Higher Education Act of 1965; El or
	Attached is a detailed agenda of the activities taking place during the travel (i.e., ar hourly description o planned activities) (signify "yes" by checking box); M I represent that (check one of the following): a. The sponsor of the trip is an intilution of higher education within the meaning of so-stion 101 of the Higher
	Attached is a detailed agenda of the activities taking place during the travel (i.e., ar hourly description o planned activities) (signify "yes" by checking box): El 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: I or Description of the trip does not retain or employ a federally registered lobbyist or registered forcing agent
9.	Attached is a detailed agenda of the activities taking place during the travel (i.e., ar hourly description o planned activities) (signify "yes" by checking box): El 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 Highe Education Act of 1965: I as Education Act of 1965: I as E. The sponsor of the trip does not retain or employ a federally registered lobbyist or registered foreign agent E gr

1	If the trip is not sponsored by an institution of higher education, or foreign agent will not accompany House Members or employee chacking box):	represent that a federally-registered lobbyist s on any segment of the trip (signify "yes" by
1	Private sponsors must have a direct and immediate relationship visited. Describe the role of each sponsor in organizing and conducARIB NEWS FOUNDATION (SEE ATTACHED SHEET)	
1	. Describe each sponsor's organizational interest in the purpose of t	
	THE INTEREST OF CARIB NEWS FOUNDATION IS TO PROMO	
	MEANINGFUL CONNECTION BETWEEN THE UNITED STATES	AND THE CARIBBEAN
. :	Describe the type and class of the transportation being provided. In addition, for travel offerst-class transportation will be provided. In addition, for travel offered on a commercial Hight, chartered Hight or on a niteration be Federal Aviation, Administration to operate for compensation fare is being provided, or if travel is via chartered or private aire wily such travel is waranted.	via aircraft, please indicate if travel is being perated or paid for by a carrier not liceused by or hire (i.e. a private aircraft). If first-class
	REGULAR SCHEDULED AIR SERVICE, ECONOMY CLASS	
	i. I represent that the expenditures related to local area travel du recreational activities of the invitee(s). (signify "yes" by checking	ring the trip will be unrelated to personal or tox):
	 I represent that either (check one of the following): 	
	a. The trip involves an event that is arranged or organized without needs provided to congressional participants are similar to attendees: Sometimes of the congressional participants.	hose provided to or purchased by other event
	b. The trip involves ovents that are arranged or organized specific	ally with regard to congressional participation:
	If "b" is checked, detail the cost per day of meals (approxima	rte cost may be provided o
	Reason for selecting the location of the event or trip: A CARIBB PREVIOUSLY HOSTED THE CONFERENCE	EAN COUNTRY THAT HAS NOT
	Name of hotel or other lodging facility: SANDALS RESORT/RE	X RESORT
	. Cost per night of hotel or other lodging facility (approximate cost	may be provided): \$1 0.00
	Reason(s) for solecting hotel or other lodging facility: HAS APP	HOPRIATE MEETING FLOOMS
	A STATE OF THE STA	

21. TOTAL EXPENSES FOR EACH PARTICIPANT:

☐ actual amounts ☑ good faith estimates	Total Transpartation Expenses per Participant	Total Lodging Expenses per Participant	Total Meni Expenses per Participant
For each Member, Officer, or employee	320	330	16.5
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 'o 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 (rigntf; "yes" by checking box): D

	the necessary for the purpose of the Esty (9819). You by streaming only.
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 19916
	Telephone number: 212-944-
	Fax number: 212-944-2089
	Email Address: @AIT.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:

Containities on Standards of Official Conduct 'U.S. House of Representatives 11T-2, The Capitol Washington, DC 20515 (202) 225-7103 (phono) (202) 225-7392 (general fax) (202) 225-7172 (fax for travel approvals)

(202) 220-1112 (fax for travel approvais)

Version date 4/2007 by Committee on Standards of Official Conduct

3

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PAGE 05

2007 MULTINATIONAL BI NOVEMEBR 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 Lec					
Gregory Meeks					
Edolphus Towns					
Yvette Clarke					
Maxine Waters					
James Clyburn					
David Scott					
Laura Richardson					
Eleanor Holmes-Norton					İ
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Keith Ellison					
Henry Johnson					
Melvin Watt		<u> </u>			
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TO:202 225 7392

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2007 MULTINATIONAL BI	USINESS CUNFER	LENCE			
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INVITED MEMBERS OF	CONGRESS		1		<u>:</u>
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Donna M. Christensen					
William Lacy Clay					
Sheila Jackson Lee	•				
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Kendrick Meek					
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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					
Britt Weinstock					
George Dalley					Ь

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Carib Neps Foundation
7 West 36th Street, 8th floor, Nep York, NY 10017
Tel: (212) 944 Fax: (212) 944-2089
E-mail: Caribnewsonference.com

Item #12

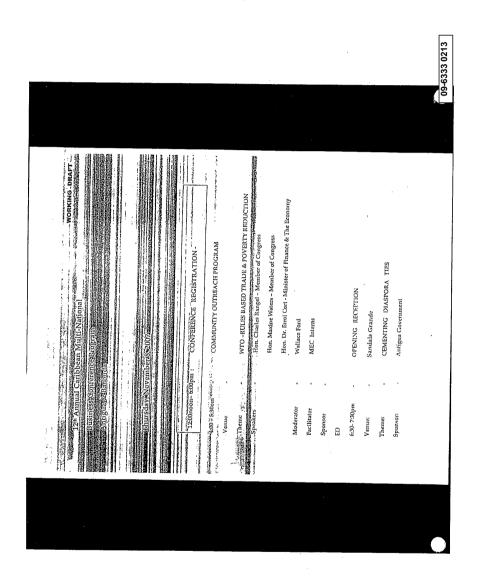
CARIB NEWS FOUNDATION is organized to provide education and information about the Caribbean in the area of Business, Education, Health and Culture, Promote Good neighborly within the United States and the hemisphere.

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.

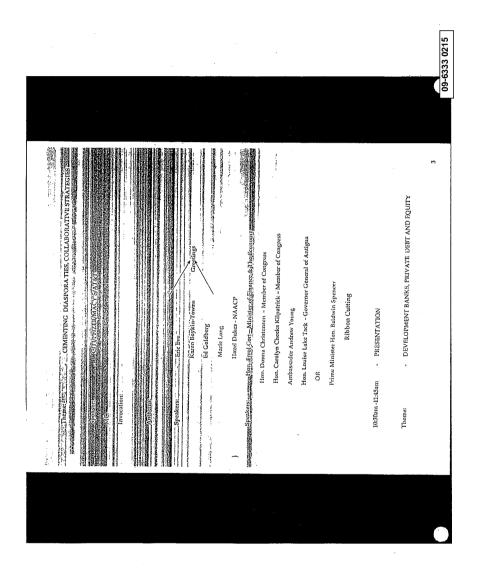
Organized by Carib News Foundation. A non-profit project 501-C3 corporation

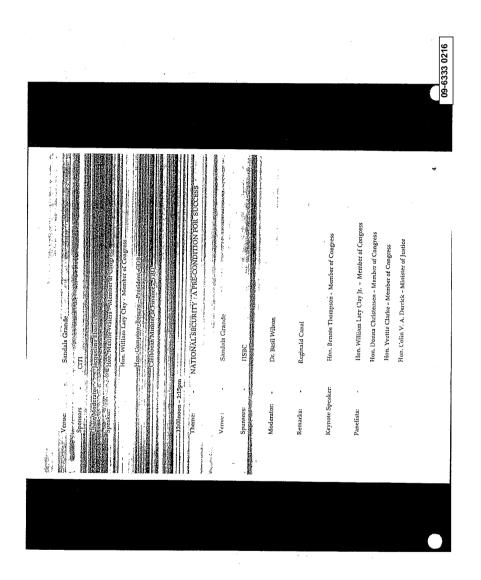
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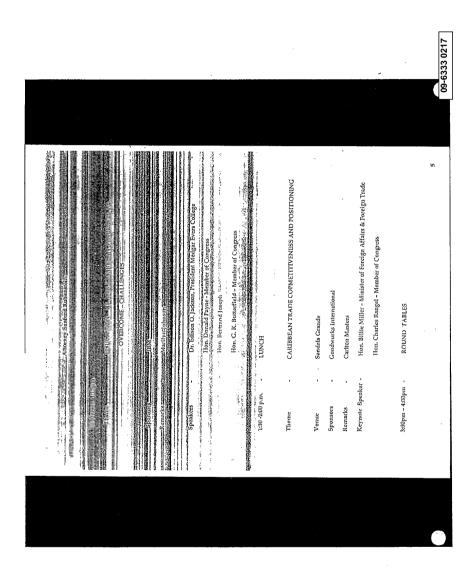
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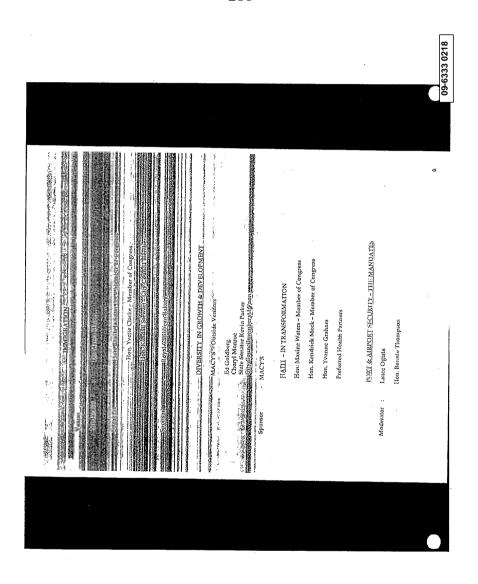


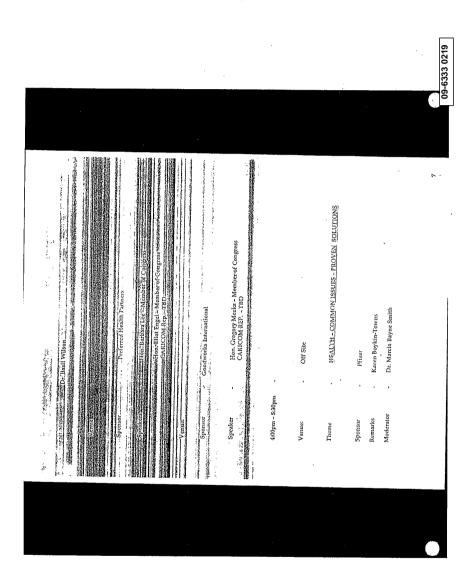
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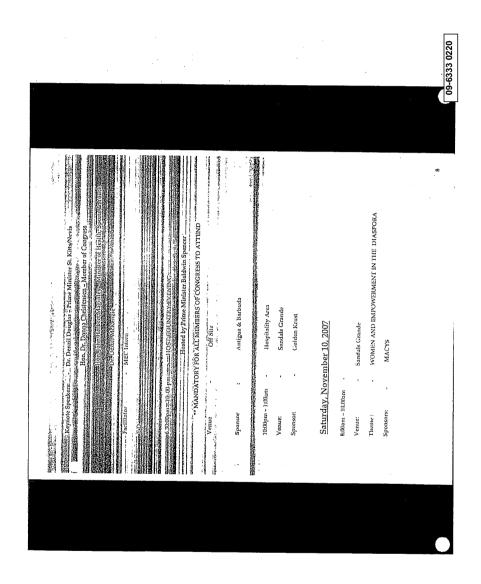


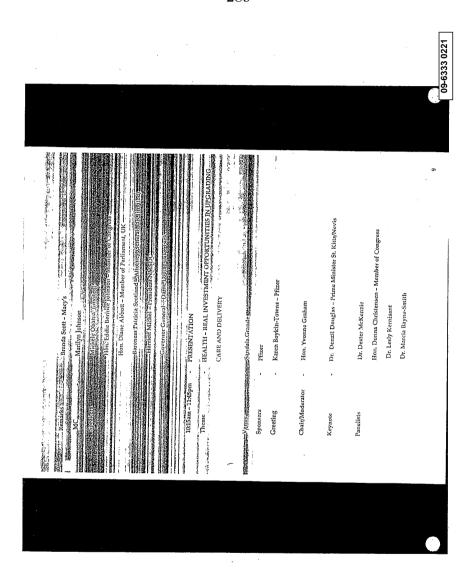


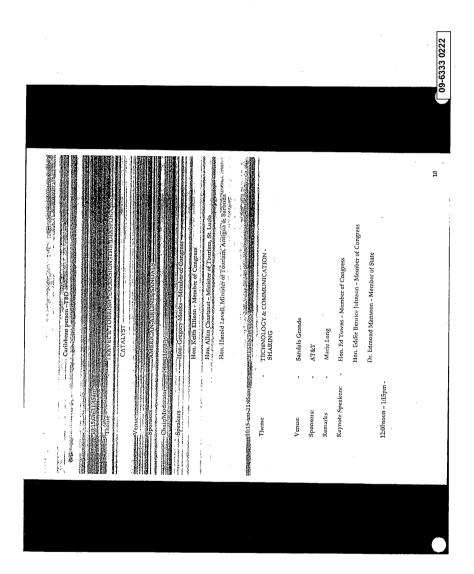


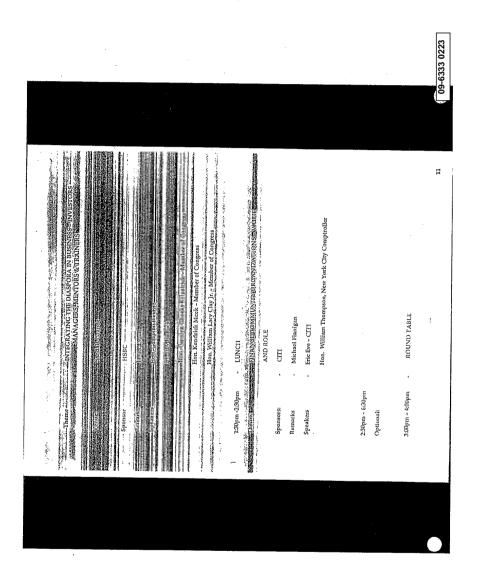


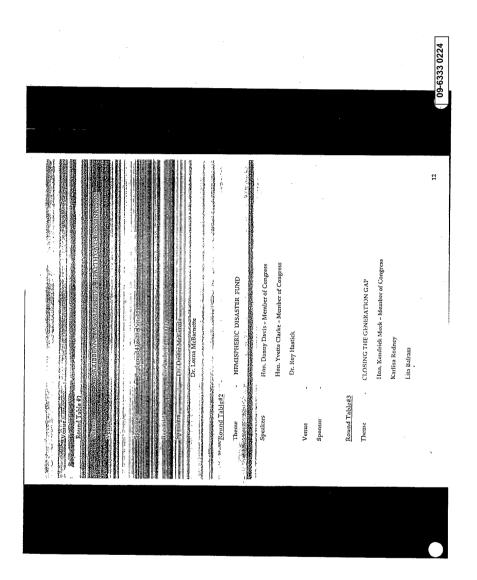


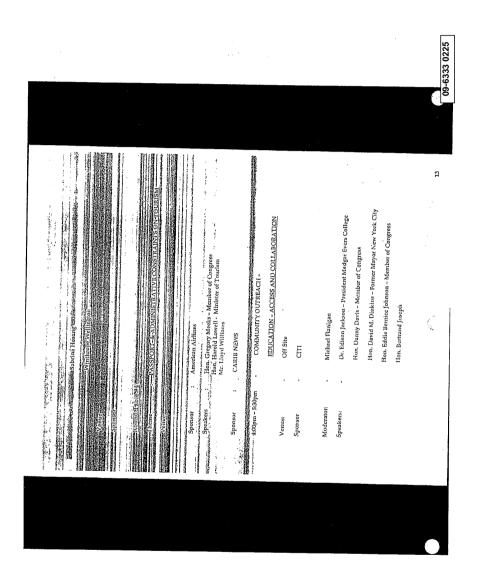


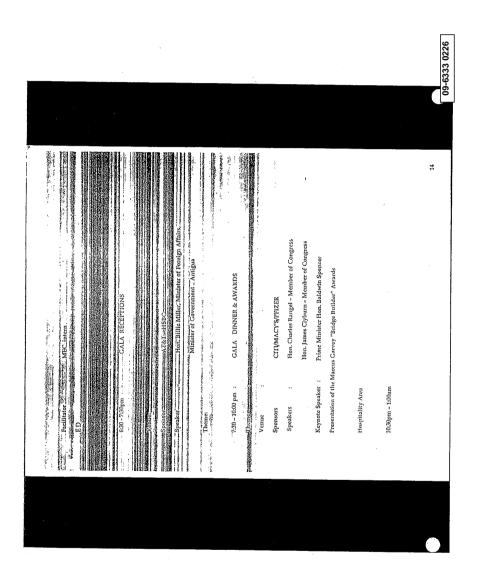


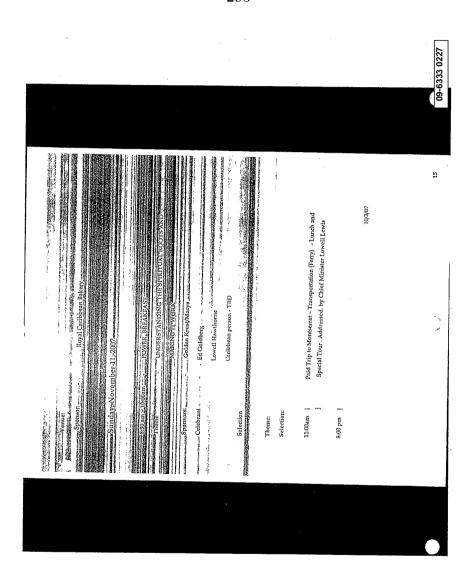


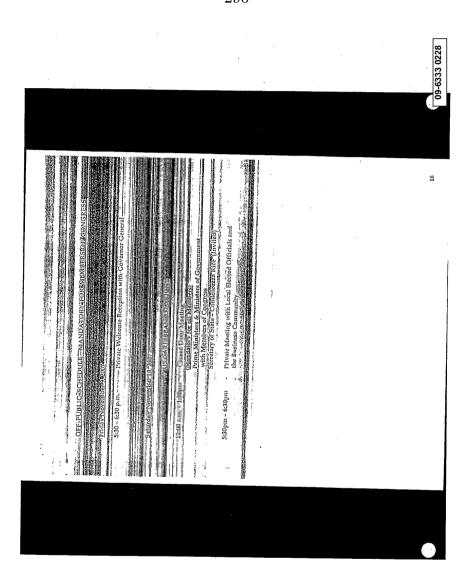












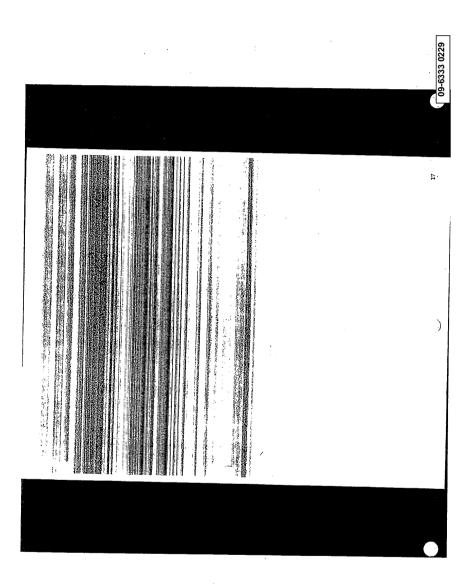


EXHIBIT 20

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 of 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. The OCE requested an interview with Representative 1 from Macy's and he consented to an interview. Representative 1 from Macy's was given an 18 U.S.C. § 1001 warning and signed a written acknowledgement of the warning. Representative 1 from Macy's made the following statements in response to our questioning:

- 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.
- 2. 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.

MOI - Page 1 of 2

OFFICE OF CONGRESSIONAL ETHICS

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

- 3. 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.
- 4. 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.
- 5. 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.
- 6. 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.
- 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.
- 8. 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

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OFFICE OF CONGRESSIONAL ETHICS

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EXHIBIT 21

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WORKING DIEFT TURE

12th Annual Caribbean Multi-National Business Conference Program Antigua & Barbuda

Thursday, November 8, 2007

12:00noon-6:00pm ±		CONFIRENCE REGISTRATION -		
5:00 6:30om	-	COMMUNITY OUTREACH PROGRAM		
Venue	-	Multi-Purpose Collinal Centre - Perry Bay, St. John's		
Thone		WYO -ROLES RAGED TRADE & POVERTY REDUCTION		
Speakers	-	Hon. Charles Rangel - Member of Congress		
		Hon. Maxime Waters - Member of Congress		
		Hop. Dr. Errol Cort - Minister of Finance & The Economy		
Moderator	•	Tany Best		
6:30-7:30pm	_	OPENING RECEPTION		
Venue:	-	Sandals Grande - Main Ballroom		
Theme:	-	CHMENTING DIASPORA THES		
MC:	-	Judge Sylvin Hinds-Radix		
Speakers	-	Faye A. Rodney -President CARIB NEW 6		
		Hon, Yvette Clarke ~ Member of Congress		
7:30 - 9:30 pm				
Theme:	~	COLLABORATIVE STRATEGIES		

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Sandals Grande - Main Baliroom Venue:

Hon. Nick Perry, New York State Assemidyman Moderator

Hon, 'Butelt' Stewart, Chairman, Sandala Hon. Ba' Towns - Member of Congress Hon. Harold Laveli - Minister of Tourism & Aviation Speakers

Hospitality Axea 10:00рт - 1:00ли: -

Sandals Grande - Reflective Pool Venue

Friday, November 9, 2007

8:00am - 8:45am BREAKFAST - Buffet Style

CONFERENCE REGISTRATION 9:00am - 6:00pm

9:00am - 10:15am - OPENING CEREMONIES

- Sandals Grande - Main Ballroom

- CEMENTING DIASPORATIES, COLLABORATIVE STRATEGIES Themer

Remarks:

- Etic Eve
Dr. Lowell Levels, Chief Minister
Montserrat
Montserrat
Koren Bloyfin-Towns
Et Guidberg
Marie Long
Hazel Dekes - NAACP
William Thompson, NYC Conipitoller
Commissioner Battsh Wescol-Williams, Leade: of Govt. St. Maanten

Speakers:

Hon. Errol Cort - Minister of Finance & The Leonomy Hon. Donna Christensen - Member of Congress Hon. Carolyn Checks Kilpatrick - Member of Congress

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Ambassador Androw Young Hon. Jouise Leke Tack - Governor General of Antigua OR Prime Minister Hon. Buldwin Spencer

Hibbon Culting

0:30au -11:45am - PRESENTATION

Thome: - DEVELOPMENT BANKS, PRIVATE DEET AND EQUITY

Venue: - Sandals Grande

Chair/Moderator - Dr. Enrique Rigge

Speaker: Hon. Maxine Waters - Member of Congress

Ron. Complen Bourne-President, CDB

Mr. Mikton Lawrence, Chairman Financial Services Corporation

Mr. Rudulph Carryl

Hon. Dr. Denzil Douglas, Prime Minister/Minister of Finance, St. Kitts

10:30 - 11.45am CULTURE - PROMISE & POTENTIAL IN BUGINESS

Remarks : Speaker:

Professor Rex. Nettleford

Hon. Howard Dotson

Patrick Payne

Hon. Harold Lovell, Minister of Culture

12:00x00n-1:18pm

Thome: - NATIONAL SECURITY: A PRIJ-CONDITION FOR SUCCESS

Venue: SandaIs Grande

Modexator: Leyland Hazlewood

Remarks: - Meginald Canal

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Keynute Speaker:

Hon. Bennie Thumpson - Member of Congress

Fanelists: - Han, Dwyer Astaphun, Minister of National Security

Hon. Yveilte Clarke – Member of Congress

Hon. Colin V. A. Derrick - Minister of Justice

Attorney Sanford Rubenstein

12:00:100n -1:15pm

Theme -

EDUCATION - U. S AND CARIBBEAN SYNERGIES TO

OVERCOME CHALLENGES

Remarks - Colin Ward

Speakers -

Dr. Edison O. Jackson, President Medyar Evers College

Hon. Donald Payne - Member of Congress Hon. Besteand Joseph, Minister of Education

1:30pm - 1.UNCH

Theme:

- RINANCE COMMUNETY ORGANIZATIONS - VALUE

AND ROLE

Kemarks

- Michael Flanigan

Speakers

- Bric Eve - CITI

Hon. William Thompson, New York City Comptroller

8:00pm - \$00pm -

ROUND TABLES

IMMIGRATION -

Vinue

Sandals Grande

Moderator

Dr. Marco Mason

18/24/2807 19: 08 2129442809 PAGE 87

Spenkurs - Han. Barban Lee - Member of Congress

Hon. Vestte Clarke - Member of Congress

DIVERSITY IN GROWTH & DEVELOPMENT

Hon, Kendall Stewart - City Council member

MACY'S - Outside Vendors

Ed Goldburg Cheryl Monroe State Senator Kevin Parker City Councilmember Inez Dickens

HATTI - IN TRANSFORMATION

Hon, Maxine Waters -- Member of Congress

Hon Yvonas Graham

Ambassador Andrew Young

PORT & AIRPORT SECURITY - THE MANDAUES

Moderator : Mr. Lance Ogiste

Hon. Bennie Thompson

Hon. Dwer Astaphan

Venue

Sandals Grande

Participant - Preferred Flealth Partitors

Speakers - Hoa. Barbura Lee - Member of Congress

Venue:

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Speaker - Hon. Gregory Mecks - Member of Congress ?
CARICOM REF. - TED

5:00pm - 6:30pm

Venue: - Multipurpose Cultural & Exhibition Centes - Perry Bay

There - HEALTH - COMMON ISSUES - PROVEN SOLUTIONS - MOVE

Healthy Eating, Escalthy Living

Remarks - Ms. Karen Boykin-Towns

Moderator - Dr. Marcia Bayne Smith

Keynote Speakers: - Dr. Denzil Douglas - Frime Minister St. Kiffs/Nevis

Hon, Dr. Martin Valdes-Preferred Health Partners

Hon. John Herbert Maginley - Minister of Health, Sports & Youth

Dr. John Falmer

Hon. Diane Watson, Member of Congress

6.30:10pm - 10:00 pm - HOST COUNTRY EVENING

Hosted by Prime Minister Baldwin Spensor

Venue - Multipurpose Cultural and Exhibition Centre - Perry Bay

10:00pm - 1:00am - Hospitality Area

Venue: - Santials Grande - Reflection Pool

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Saturday, November 10, 2007

8:00am -- 10:00am --

Venue: - Sandala Grande - Main Ballroom

Theme: . WOMEN AND EMPOWERMENT IN THE DIASPORA

Remarks - Brenda Scott

MC - Marilyn Johnson

Speakers - Hon, Diane Abboit, MP UK

Commissioner Sarah Westcot-Williams,

Hon. Caroline Checks Kilpstrick, Member of Congress Hun. Eddia Bernics Johnson - Member of Congress

Dr. Mantella Maxwell

Ms. Toni Fay

Governor General - Dame Louise Lake Tank - check

Ms. Lucille McEwen, President/CEO HCC)

Commissioner Wescot-Williams, Lender of Government

10:15am - T1:45pm - PRESENTATION

Theme + HEALTH - REAL INVESTMENT OFFORTUNITIES IN UFGRADING

CARE AND DELIVERY

Venue - Sandals Grande

Greeting - Karea Boykin-Towns - Pfizer

Chair/Moderator - Hon. Yvonne Graham

Keynote - Dr. Denril Douglas - Frime Minister St. Klits/Nevis

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PAGE 1.0

Panelists Hon. John Herbert McGinley, Minister of Health

Dr. Morcia Bayne-Smith

Dz. Carl Kenel Pierre, Preferred Health Paxiners

10:15am-11:45am

TRAVEL & TOURISM EXPANSION-THE DIASPORA AS

CATALYST

Venue Sandals Grande

Chair/Moderator Mr. Lloyd Williams, GHCC

- Hon. Laura Richardson - Member of Congress

Hon. Harold Levell, Minister of Tourism, Antiqua & Barbuda

Hon. Howard Dotson, Director Schomburg Center

12 noon-1.15pm - PRESENTATION

Theme TECHNOLOGY & COMMUNICATION -

Venue: Sandals Grande

Ms. Marie Long Keynote Speakers: -Hon. Ed Towns - Member of Congress

Hon, Eddie Bernice Johnson - Member of Congress

Dr. Edmond Monsoor - Member of State

Dr. Emmanuel Gonsalves

12:00noon - 1:15pm -

Remarks

- Integrating the diaspora in Pusiness – investors Managers, mentors & Trainers Theme

10/24/2007 19:00 2129442099 PAGE 11 Sandals Grande Moderator - Roy Hastick Parificipant - Mr. Juvier Evans Remarks - Hon. Compton Battern Speakers Hon. Adolfo Carrion, Bronx Boxough Presiders Hon. Carolyn Cheeks Kilpatrick – Member of Congress Hon. Professor Rex Nettleford LUNCH 1:30 -2:00 pan. -CARIBBEAN TRADE COMPETITIVENESS AND POSITIONING Sandals Grande Remarks Wallace Ford - Goodworks International Keynole Speaker -Hon. Billie Miller - Minister of Foreign Affairs & Foreign Trade Hon. Charles Baugel - Mumber of Congress 2:30pm - 6:30pm Optionali 3:00pm ~4:00pm ROUND TABLE Sandals Grande

Themse : CARDEBEAN - A COMPETITIVE HEALTH CARE DESTINATION

Venue

Remarks : Dr. Lesiy Keenisaate

Speakers : Dr. Dexter MeiKenzie

Hon. Yvonne Graham

Round Table#2
Theme - HEMISPHERIC DISASTER FUND

Venue - Sandala Grande

Speakers Hon. Yvothe Clacke - Member of Congress

Participuni

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Round Table#3

Theme - CLOSING THE GENERATION GAP

Speaker - Hon. Yveite Clarke - Member of Congruss

Mr. Leyland Bazlewood Mr. Emmanuel Gonsalves

Kmiisa Rodney Lita Balram Sabrina Hosang

Wintiwope Wellington

Venue - Bandals Grande

Participant

10

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Round Table #4

: PASSPORT & ADMINISTRATIVE CONSTRAINTS ON TOURISM Theme

: Sandals Grande Verme

Hon. Harold Lovell - Minister of Tourism Mr. Lloyd Williams, GHCC Hon. Darryl Towns, State Assemblyman Spenkers

COMMUNITY OUTREACH -5:00pm - 6:50pm

EDUCATION & YOUTH DIRECTION - ACCESS AND COLLABORATION

Multipurpose Cultural & Exhibition Center Venue

Michael Flanigan Moderator:

Dr. Edison Jackson – President Medgar livers College Speakerst

Hoz. David M, Dinkins - Former Mayor New York City

Hon. Eddie Bernice Juliuson - Member of Congress

Hon. Bestrand Joseph

GALA RECEPTION 6:30 - 7:30pm -

Sandals Grande Verme

Hom. Stephanie Tubbs-Jones, Member of Congress Speaker

Hon. Billie Miller, Minister of Foreign Affairs,

Minister of Government ... Antigua

Themes

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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

Prime Minister Hon. Baldwin Spencer

Presentation of the Marcus Gazvey "Bridge Buildar" Awards

Hospitality Area

10:30pm – 1:00am

Venue:

Sunday, November 11, 2007

8:30 am - 10:00am - POWER BREAKFAST

- Understanding the spiritual rodts and

MAKING IT WORK

Celebrant

Ed Goldberg

Lowell Bawthome

Carlibbean person - TBD

Selection

Themer

Selections

10/16/07

12

EXHIBIT 22

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 09-6333; 09-2567; 09-4403; 09-3698; 09-2222

Review #: 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

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 made the following statements in response to our questioning:

- 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

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Office of Congressional Ethics

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.
- 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 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 new 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 supports of the conference. It was clear they were supporters of the conference financially.

Office of Congressional Ethics

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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 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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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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- 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

Office of Congressional Ethics

09-6333 0253

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EXHIBIT 23



TBL: (212) 944-2089
E-MAIL ADDRESS: MAIL. COM;

PACSIMILE TRANSMITTAL SHEET FROM: Patricia Louis TO: Kelly Mobley Reny arcong Company:
Communities on Standards of official conduct
FAX NUMBER:
202-225-7392 DATE: 8/20/08 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

09-6333 0255

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Carib News Houndation
7 West 36th Street, 8th floor, New York NY 10017
Tel: (212) 944 Fax: (212) 944-2089
E-mail:

@caribnerseconference.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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CN-000113

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U.S. House of Representatives Committee on Standards of Official Conduct

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM (provide directly to onch House invites)

This form should be completed by private entities offering to provide travel or relativusement for travel to House Monthers, 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 Mombar, officer or employee, who will then forward it to the Committee. The trip spensor 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 reactiving approval for the trip. The submission of an incomplete form will delay the rowled process. Before completing this form, sponsors are urged to enrofully various the Committee's 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):

whole or in part) by a foderally-registered lobbylst or a box): from any other source funds carmarked directly or indirectly socking box): member of the House invites(a)? For each invites, provide explanation of why the individual BASED ON COMMITTEE OR SUB-COMMITTEE ON WHICH THE MEMBER SERVES. DEPENDING ON MEMBER
nember of the House invites(a)Y IL Yes IN No for each invites, provide explanation of why the individual BASED ON COMMITTEE ON SUB-COMMITTEE ON WHICH THE MEMBER SERVES,
for each invite, provide explanation of why the individual BASED ON COMMITTEE OR SUB-COMMITTEE ON WHICH THE MEMBER SERIVES,
BASED ON COMMITTEE ON SUB-COMMITTEE N WHICH THE MEMBER SERVES,
DEPENDING ON MEMBER
DEPENDING ON MEMBER .
king place during the travel (i.e., an hourly description of Ed reducation within the meaning of section 101 of the Higher by a federally registered lobbyist or registered foreign agent: lobbyist involvement in planning, organizing, requesting, or multitee's travel regulations. tif you checked Question 9(c)), check one of the following:
□ or

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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 Mombors or employees on any segment of the trip (signify "yes" by checking box): $\vec{\mathbf{U}}$
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)
12	•
1.3.	Describe cach sponsor's organizational interest in the purpose of the trip: THE INTEREST OF CARIB NEWS FOUNDTION IS TO PROMOTE, INFORM, TRADE AND
	ESTABLISHMENT OF MEANINGPUL 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 effected on a commorbial flight, chartered flight or on an aircraft operated or paid for by a cerrior not licensed by the Federal Aviation Admirton the record for componentation or hize (i.e., a private directal). It first-class face is being provided, or if travel is via chartered or private aircraft, please provide an explanation describing why such travel is warranted.
	REGULAR SCHEDLED AIR SERVICE, ECONOMY CLASS
	I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the inviteo(s). (signify 'yes' by checking box): If represent that citiner (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 attendess: If or the provided to the congressional participants are similar to those provided to congressional participants in the distribution of the provided to congressional participation: If "b" is checked, detail the cost per day of meals (approximate cost may be provided):
17.	Reason for solecting 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 soleoting hotel or other lodging facility; HAS APPROPRIATE MEETING ROOMS

2

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21. TOTAL EXPENSES FOR BACH PARTICIPANT:

□actual amounts □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

_			
u	ERRECONOMINATOR PROPERTY CONTRACTOR CONTRACT	TOTAL CONTRACTOR OF THE PARTY O	
H		Other Expenses	Identify Specific Nature of "Other" Expenses (e.g.,
1		(dollar amount)	taxi, parking, registration fee, etc.)
	For each Member, Officer, or employee	\$150 \$ 25	Conference Registration Local transportation
	For each accompanying family member		

22. I represent that reinbursement for miscellausous travel expenses for the trip, such as travel to and from sirports, security costs, interproter fees, visa application fees, and similar expenses, will be for actual costs incurred and are necessary for the purpose of the trip tignth—"see" by checking box):

I certify that the infi	organifer contained in this form's true, complete, and correct to the best of my knowledge.
Signature:	40000
Name and title:	KARL B. RODNEY, CEO
Organization:	CARIB NEWS FOUNDTION
Address:	7 WEST 36Ih STREET, 8Ih FLOOR, NEW YORK, NY 10018
Telephone number:	(212) 944
Pax mmbar:	(212) 944-2089
Bmail Address:	gatt.ne'f

If there are any questions regarding this form please contact the Committee at the following address:

fliere are any questions regarding this form please contact the Committee at the Committee on Standards of Official Conduct U.S. House of Representatives HT-2, The Capido Whatington, DC 20515 (200) 225-7103 (plune) (200) 225-7103 (plune) (200) 225-7103 (plune) (200) 225-7103 (plune) (200) 225-7103 (plune) (200) 225-7172 (flax for travel approvals)

Version date 4/2007 by Committee on Standards of Official Conduct

09-6333 0259

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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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CN-000117

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Caril News foundation
7 West 363% Stock, 83% floor, New York, NY 10017
Tel: (212) 944-11 four (212) 944-2089
E-mail: Recribe we content account

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.

<u> Item#17</u>

A Caribbean country whose proximity to other Caribbean Countries makes it conveniently located for delegates from the other Caribbean countries to attend,

Organized by Carlb 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: 202-226 Fax: 202-226-3717

Congresswoman Diane E. Watson US House of Representatives 125 Cannon HOB Washington , DC 20515 Phone: 202-225-Fax: 202-225-2422

Congressman Kendrick Meek U.S House of Representatives 1039 Longworth HOB Washington, DC 20515 Phone: 202-225 Fax: 202-226-0777

Congressman David Scott
U.S House of Representatives
417 Cannon HOB
Washington, DC 20515
Phone: 202-225
Fax: 202-226-4268

Congressman James Clyburn US House of Representatives 2135 Rayburn HOB Washington, DC 20515 Phone: 202-225-Fax: 202-225-9263

Congressman Robert Scott
U.S House of Representatives
1201 Longworth HOB
Washington, DC 20515
Phone: 202-225Fax: 202-225-8354

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Congresswoman Nydia Velaquez U.S House of Representatives 2241 Rayburn HOB Washington, DC 20515 Phone: 202-225 Fax: 202-226-0327

Congressman Charles Rangel U.S House of Representatives 2354 Rayburn HOB Washington, DC 20515-3215 Phone: 202-225 Fax: 202-225-0186

Congressman Donald Payne
U.S House of Representatives
2209 Rayburn HOB
Washington, DC 20515
Phone: 202-225
Fax: 202-225-4160

Congresswoman Donna M. Christensen U.S House of Representatives 1510 Longworth HOB Washington, DC 20515
Phone: 202-225
Fax: 202-225-5517

Congressman Edolphus Towns
U.S House of Representatives
2232 Rayburn HOB
Washington, DC 20515
Phone: 202-225Fax: 202-225-6018

Congressman G. K. Butterfield U.S House of Representatives 413 Cannon HOB Washington, DC 20615 Phone: 202-225-Fax: 202-225-8256

Congressman Gregory Meeks U.S House of Representatives 1710 Longworth HOB Washington, DC 20515 Phone: 202-225-Fax: 202-225-4169

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Congressman Jesse Jackson Jr. U.S House of Representatives 2419 Rayburn HOB Washington, DC 20516 Phone: 202-225-Fax: 202-225-0899

Congressman Keith Ellison U.S House of Representatives 1130 Longworth HOB Washington, DC 20515 Phone: 202-225 Fax: 202-225-4886

Congressman Kendrick Meek U.S House of Representatives 1039 Longworth HOB Washington, DC 20515 Phone: 202-225 Fax: 202-225-0777

Congresswoman Maxine Waters U,S House of Representatives 2324 Rayburn HOB Washington, DC 20515 Phone: 202-225 Fax: 202-225-7854

Congressman Melvin Watt U.S House of Ropresentatives 2236 Rayburn HOB Washington, DC 20515 Phone: 202-225-Fax: 202-225-1512

Congresswoman Barbara Lee U.S House of Representatives 2444 Rayburn HOB Washington, DC 20515 Phone: 202-225-Fax: 202-225-9817

Congresswoman Caroline Cheeks Kilpatrick U.S House of Representatives 1610 Longworth HQB Washington, DC 20515 Phone: 202-225 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-Fax: 202-225-2256

Congresswoman Eddie Bernice Johnson U.S House of Representatives 1511 Longworth HOB Washington, DC 20515 Phone: 202-225 Fax: 202-2256-1477

Congresswoman Sheila Jackson Lee U.S House of Representatives 410 Canon HOB Washington, DC 20615 Phone: 202-225-Fax: 202-225-3317

Congresswoman Yvette Clarke U.S House of Representatives 1029 Longworth HOB Washington, DC 20515 Phone: 202-225-Fax: 202-2256-0112

Congressman Danny Davis U.S House of Representatives 1222 Longworth HOB. Washington, DC 20515 Phone: 202-225 Fax: 202-225-5641

Congresswoman Stephanic Tubbs-Jones U.S House of Representatives 1546 Longworth HOB Washington, DC 20515 Phone: 202-225 Fax: 202-226-1539/2367

Congressman Bennie Thompson US House of Representatives 2422 Rayburn HOB Washington, DC 20515 Phone: 202-225 Fax: 202-226-5898

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4

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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 :

5:00-6:30 -TOWN HALL FORUM - HEALTH Healthy Eating and Living

Innovative Solutions for Life styles

Diseases- a Collaborative Approach - Diabetes,

CONFERENCE REGISTRATION-

Hypertension, Obesity, Oral Health

ROYAL ISLANDER Venue Dr. Marcia Bayne Smith Moderator

Speakers Mrs. Karen Boyldn-Towns

Congressmomher 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

09-6333 0266

CONFIDENTIAL CN-000123 Theme: A REGION IN TRANSITION -

Speakers: - Faye A. Rodney

Hou, 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 Sylvla 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

09-6333 0267

CN-000124

CONFIDENTIAL

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9100am - 6100pm

CONFERENCE REGISTRATION OCEAN TERRACE LOBBY

CONFERENCE SECRETARIAT
SABA ROOM

9:00am - 10:15am

OPENING CEREMONIES

Venue:

MAHO ROOM

Theme:

BUILDING ALLIANCES FOR PROGRESS

Invocations

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 Savah Wescot-Williams, Leader of Government, St. Maarten

Harry Belafonte

3

09-6333 0268

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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 Keizs

Congressmember Eddie Bernice Johnson

Professor Rex Nettleford

12.00 noon - 1:15p.m.

PRESENTATION

TRAVELAND TOURISM -

 ${\it A}$ Transformative ${\it Approach}$

Moderator

Lloyd Williams

Greetings

Wallace Ford

Speakers

Commissioner Roy Marlin

Howard Dodson

Congressman Gregory Meeks Professor Rex Nettleford Dr. Martin Valdes

09-6333 0269

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12:00 noon - 1:15p.m - PRESENTATION

HEALTH – AN ECONOMIC DEVELOPMENT STRATEGY FOR THE REGION

Greetings - Karen Boykin-Towns

Moderator - Yvonne Graham Speakers - Dr. Denzil Douglas

Dr. Cark 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 – THINKFINITY PRESENTATION &

DEMONSTRATION

09-6333 0270

5

CONFIDENTIAL 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

4130pm ~ 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

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Venue: HOST COUNTRY EVENING 6.30100pm - 7130pm -Venue: Theme MC: CULTURAL PRESENTATION Speakers: 7:30 – 8:00 pm: 8:00pm - 10:30.pm. Venue: Theme HOSPITALITY AREA 10:00pm - 1:00am Venue: Saturday, November 8, 2008 BREAKFAST 7:45 am – 8:15 am OCEAN TERRACE Venue PRESENTATION 8:30am - 10:00am WOMEN OF INFLUENCE AND POWER Theme

7

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Venue:

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 Bernice Johnson

Rev. Dr. Susan Johnson-Cook

10.15am – 11:45am

PRESENTATION

Theme

THE CARIBBEAN, IT'S VALUE & POTENTIAL

Venne

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

8

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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 Ffriend

Speakers

Adolfo Carrion, Borough President, Bronx, New York Compton Bourne, President Carlbbean 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

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 Ogiste, Brooklyn District Attorney

1:30pm - 2:30 pm

LUNCHEON

Venue

MAHO ROOM

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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, Chayles Rangel

Hon, Gregory Meeks

Hon, Ralph Gonsalves

Dr, Lesly Kernisant

4:30 pm - 6:00pm - TOWN HALL FORUM - TECHNOLOGY

Venue: Royal Islander A

09-6333 0275

10

CONFIDENTIAL CN-000132

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

11

09-6333 0276

CN-000133

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Theme:

- SPIRITUALITY - THE BASICS IN BUSINESS

Greetings

- Lowell Hawthorne

Speakers

Ed Goldberg

Selections

Local Choir

October 13, 2008

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12

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EXHIBIT 24

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CONFIDENTIAL

EXHIBIT 25

National Institutes of Health Ethics Program - Outside Activities of Natri Employees with ... Fage 2 of 4



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of the General Counsel

Office 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 a cot of self-dealing between a disqualified person and a private foundation." 20 LSC. § 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 6S-15-7 levels, irrespective of their appointment mechanism (Tille 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. 28 U.S.C., \$4941 (0(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 https://www.trus.ustreas.gov/bus.brio/be/seeasca/h.tim/.

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5/28/2009

National Institutes of Health Ethics Program - Outside Activities of NIH Employees with ... Page 3 or 4

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 has operating 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. § 55.444 (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 schokarships and fellowship grants; qualifying anouthly plans; contributions or gifts not exceeding an aggregate of \$25; payments made under the government employee training program in \$ U.S.C. Ch. 41; and payment of travel expenses within the United States. 26 U.S.C. § 4941 ((9)(6)); hev. 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 NHI 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 to 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(a)(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 L.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), Treas, 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 (e) (2), As with the initial tax, the penalty on a foundation manager is limited to \$10,000. 26 U.S.C. § 4941 (e) (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 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 Conoress. or a Reserve or National Guard officer.

National Institutes o	f Health Ethics Program - Outside Activities of NIH Employees with Page 4 of
	Back to Too I Home Page I Contacts

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5/28/2009