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111TH CONGRESS
1st Session

HOUSE OF REPRESENTATIVES

REVIEW NO.
09–2222

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. 09–2222

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OFFICE OF

CONGRESSIONAL ETHICS

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REPORT

Review No. 09–2222

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 Bennie Thompson

NATURE OF THE ALLEGED VIOLATION: There is substantial reason to believe that Congressman Bennie Thompson's participation in the 13th Annual Caribbean Multi-National Business Conference in St. Maarten, N.A. from November 6–9, 2008, his acceptance of reimbursement of expenses to attend that conference and the Member Post Travel Disclosure Form he filed violated various provisions of House Rule XXV Section 5(b).

RECOMMENDATION: The Board of the Office of Congressional Ethics recommends that the Committee on Standards of Official Conduct further review the above described allegations concerning Congressman Thompson.

VOTES IN THE AFFIRMATIVE: 6

VOTES IN THE NEGATIVE: 0

MEMBER OF THE BOARD OR STAFF DESIGNATED TO PRESENT THIS REPORT TO THE STANDARDS COMMITTEE: Leo Wise, Staff Director & Chief Counsel.

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FINDINGS OF FACT AND CITATIONS TO LAW

Review No. 09–2222

On May 29, 2009 the Board of the Office of Congressional Ethics (hereafter 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 of whether or not a violation actually occurred.

I. INTRODUCTON

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

A. SUMMARY OF ALLEGATIONS

2. There is substantial reason to believe that Congressman Thompson 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 Thompson 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 Thompson'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 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 Thompson 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 Thompson 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 Thompson and his acceptance of payment violated the Internal Revenue Code. As stated above, Carib News Charities, the name previously held by the 501(c) organization now known as the Carib News Foundation, is listed as a private foundation in the Internal Revenue's cumulative list of charitable organizations, Publication 78. Therefore, the Standards Committee should not have approved the trip because the funds came from a prohibited source.

B. A NOTE ON CULPABILITY

6. These findings fall into four categories: (1) the sponsor or sponsors, as the case appears to be, of the conference; (2) the intervention of the counsel to the former Chair of the Standards Committee in the Standards Committee's review process of the conference in 2007 and how it affected the information before the Standards Committee in 2008; (3) the accuracy of the value of the reimbursement submitted by Congressman Thompson and (4) whether, because of its tax status, the Carib News Foundation could lawfully pay for Congressman Thompson's conference-related expenses.

7. While all these topics are relevant, the Board notes that they do not all involve conduct by Congress Thompson to the same degree.

a. As to topic 1, determining the identity of the true sponsor or sponsors implicates the conduct of both Congressman Thompson and the Standards Committee. Congressman Thompson told the OCE he relied on the Standards Committee to make that determination. It is the Board's view that the Member's approach is reasonable to a point. Once Congressman Thompson arrived at the conference, however, he was confronted with information that other corporations were co-sponsors. That information, at least in 2008, does not appear to have been before the Standards Committee when they initially approved the 2008 travel.

b. As to topic 2, the intervention of the counsel to the former Chair of the Standards Committee in the Standards Committee's review of the 2007 conference did not involve Congressman Thompson. 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 Thompson 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 "true, accurate and complete" to the "best of the Member's knowledge." Congressman Thompson saw the value of his travel and retained copies of documents that showed its true value in his office files. Nonetheless, he certified inaccurate information on the post-travel disclosure form.

d. As to topic 4, limitations on Carib News Foundation's ability to pay for overseas travel of government officials, Congressman Thompson told the OCE he was unaware of any such limitations. The Board finds this statement to be credible. Nonetheless, the law prohibits such payments. Therefore, the Board feels compelled to include a discussion of this issue in this referral.

C. JURISDICTIONAL STATEMENT

8. The allegations that are the subject of this review concern Representative Bennie Thompson, a Member of the United States House of Representatives from the 2nd District of Mississippi. 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.

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

[2] A 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 review in a matter before the expiration of the 30-day preliminary review. If the Board votes for

Continued

11. The Board voted to extend the 45-day second-phase review by an additional 14 days, as provided for under the Resolution, on 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 NEWSPAPER), THE GOVERNMENT OF ST. MAARTEN AND SEVERAL CORPORATIONS, SPONSORED REPRESENTATIVE THOMPSON 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 Thompson 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 Thompson 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 Thompson's travel according to House travel rules because these corporations had donated funds specifically for the conference (i.e. earmarked funds).

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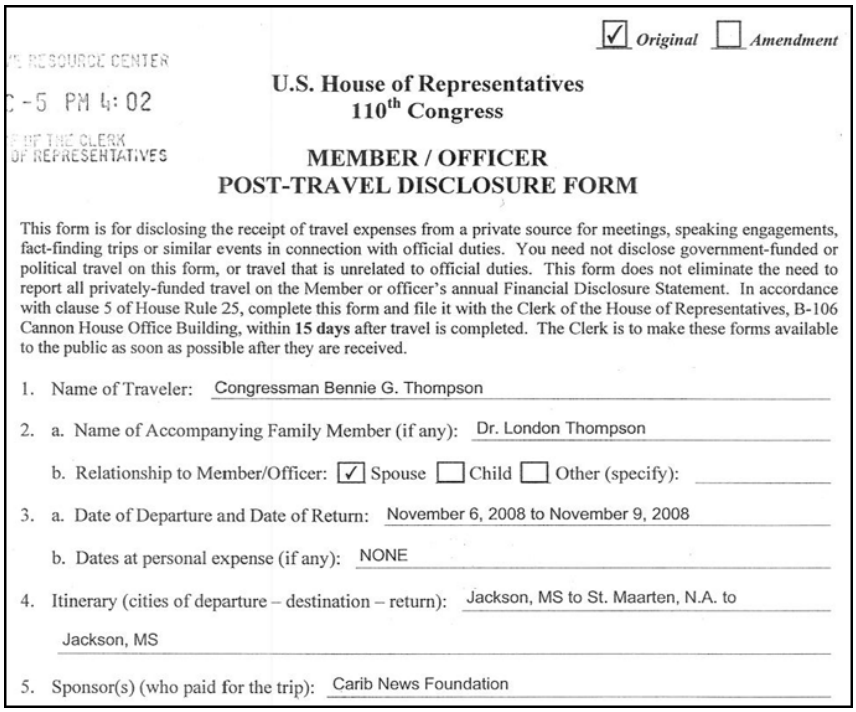
a second-phase, the second-phase begins when the preliminary review ends. The second-phase review does not begin on the date of the Board vote.

[4] 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 THOMPSON'S KNOWLEDGE OF THE INVOLVEMENT OF THESE CORPORATIONS IN THE CONFERENCE

17. On his Member Post-Travel Disclosure Form, Congressman Thompson 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 December 2008.[6]



☑ Original ☐ Amendment

RESOURCE CENTER
-5 PM 4:02
OF THE CLERK
OF REPRESENTATIVES

U.S. House of Representatives
110th Congress

MEMBER / OFFICER
POST-TRAVEL DISCLOSURE FORM

This form is for disclosing the receipt of travel expenses from a private source for meetings, speaking engagements, fact-finding trips or similar events in connection with official duties. You need not disclose government-funded or political travel on this form, or travel that is unrelated to official duties. This form does not eliminate the need to report all privately-funded travel on the Member or officer's annual Financial Disclosure Statement. In accordance with clause 5 of House Rule 25, complete this form and file it with the Clerk of the House of Representatives, B-106 Cannon House Office Building, within **15 days** after travel is completed. The Clerk is to make these forms available to the public as soon as possible after they are received.

1. Name of Traveler: Congressman Bennie G. Thompson
2. a. Name of Accompanying Family Member (if any): Dr. London Thompson
   b. Relationship to Member/Officer: ☑ Spouse ☐ Child ☐ Other (specify):
3. a. Date of Departure and Date of Return: November 6, 2008 to November 9, 2008
   b. Dates at personal expense (if any): NONE
4. Itinerary (cities of departure – destination – return): Jackson, MS to St. Maarten, N.A. to Jackson, MS
5. Sponsor(s) (who paid for the trip): Carib News Foundation

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

[5] The "Member/Officer Post-Travel Disclosure Form" asks the filer at question 5, "Sponsor(s) (who paid for the trip)." This in turn raises the question is a conference a "trip" or is a trip limited to the travel expenses associated with attending the trip, e.g., transportation, lodging and meal expenses? The House Ethics manual and the relevant forms use the terms "travel" and "trip" interchangeably. For example, the relevant form is called a Member/Officer Post-**Travel** Disclosure Form" (emphasis added). The introductory paragraph on the form provides, "[t]his form is for disclosing the receipt of **travel** expenses from a private source for meetings, speaking engagements, fact-finding **trips** or similar events in connection with official duties" (emphasis added). However, question 9 on the form asks the filer to detail, "**TRIP** EXPENSES" and uses as an example, "registration fees." Registration fees are not "travel" expenses unless one defines travel (or a trip) to include participating in a conference. The Board uses the term "trip" to include the conference. The Board also notes that the Standards Committee treated the conference as the "trip" in its letter pre-approving Congressman Thompson's trip.

[6] Member/Officer Post-Travel Disclosure Form signed by Representative Bennie G. Thompson (Dec. 5, 2008) (Exhibit 1 at 09–2222—2).

[7] *Id.* at 09–2222—3.

I certify that the information contained in this form is true, complete, and correct to the best of my knowledge. I have determined that all of the expenses listed above were necessary and that the travel was in connection with my duties as a Member or Officer of the U.S. House of Representatives and would not create the appearance that I am using public office for private gain.

SIGNATURE OF MEMBER: Bennie J. Thompson

DATE: November 26, 2008

19. In an interview with the OCE, Congressman Thompson 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 Thompson, 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]

23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: Karl B. Rodney

Name and title: KARL B. RODNEY, CEO

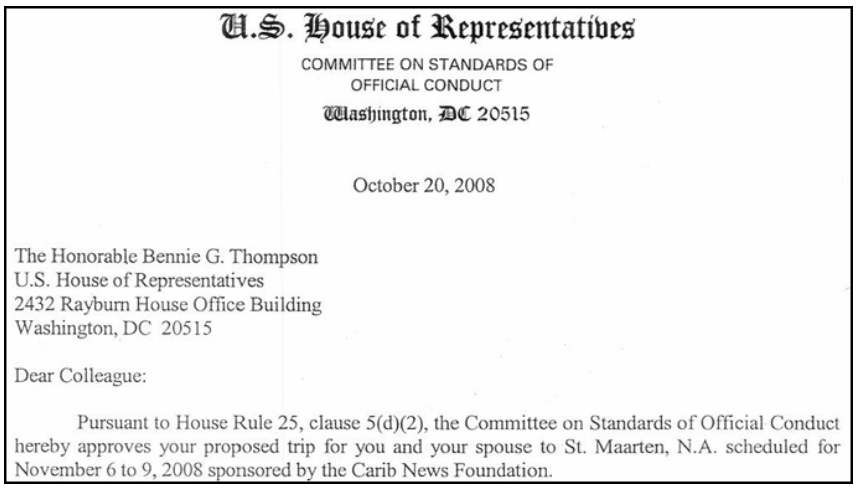
[8] Memorandum of Interview of Representative Bennie Thompson (May 6, 2009) (Exhibit 2 at 09–2222—27).

[9] Private Sponsor Travel Certification Form signed by Karl A. Rodney (Oct. 3, 2008) (Exhibit 1 at 09–2222—8).

[10] *Id.*

[11] *Id.* at 09–2222—10.

23. Prior to the conference, the Standards Committee approved the reimbursement of Congressman Thompson's expenses by the Carib News Foundation.[12]



U.S. House of Representatives

COMMITTEE ON STANDARDS OF
OFFICIAL CONDUCT

Washington, DC 20515

October 20, 2008

The Honorable Bennie G. Thompson
U.S. House of Representatives
2432 Rayburn House Office Building
Washington, DC 20515

Dear Colleague:

Pursuant to House Rule 25, clause 5(d)(2), the Committee on Standards of Official Conduct hereby approves your proposed trip for you and your spouse 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. On November 7, 2008, the conference's organizer, Karl Rodney, began the first morning program by thanking Citigroup, Pfizer, Macy's, IBM, AT&T, the Verizon Foundation and American Airlines, as well as their executives by name, who were present.[14] This morning session was recorded by an individual attending the conference and the recording was subsequently transcribed. The OCE obtained a copy of the transcript. Mr. Rodney described AT&T as "support[ing] the Conference all 13 years" (this was the thirteenth annual conference).[15]

26. Michael Flanigan, an executive from Citibank, spoke immediately after Mr. Rodney and described Citibank as the "lead sponsor of the premier event."[16]

27. Following Mr. Flanigan's remarks, and the remarks of several other speakers, Representative Carolyn Cheeks Kilpatrick spoke. At the end of her remarks she stated, "[a]nd to the sponsors, by the way, all of you, we couldn't do this, be with you, help Karl if you weren't here with us so we say thank you very much, you are so important. To all of the sponsors, thank you very much."[17]

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[12] Letter from the Committee on Standards of Official Conduct to Representative Bennie G. Thompson (Oct. 20, 2008) (Exhibit 1 at 09–2222—4).

[13] Photographs taken at the 13th Annual Caribbean Multi-National Business Conference (Exhibit 5 at 09–2222—62–70) (The Board notes that the source of this information may have a bias, interest, or motive in this matter.).

[14] Transcript of Recording of November 7, 2008 AM Session of the 13th Annual Caribbean Multi-National Business Conference (Exhibit 3 at 09–2222—30–32) (The Board notes that the source of this information may have a bias, interest, or motive in this matter.).

[15] *Id.* at 09–2222—30.

[16] *Id.* at 09–2222—32.

[17] *Id.* at 09–2222—47.

28. In an interview with the OCE, Congressman Thompson confirmed he attended this session of the conference.[18]

29. In addition to these comments, signs for the conference displayed these corporations' logos, including signs hung behind the speaker's podium.[19]

30. In an interview with the OCE, Congressman Thompson stated that he relied on the entity that invited his to the conference, the Carib News Foundation, to identify the sponsor of his trip and, further, that he relied on the Standards Committee, who pre-approved his trip, to determine if that information was accurate.[20] As a result, Congressman Thompson told the OCE that the involvement of these corporations in the conference did not raise questions in his mind about whether the Carib News Foundation was the sole sponsor of the conference.[21]

31. The Board notes that the practice of relying entirely on the Standards Committee to determine the sponsor of a Member's travel carries with it a degree of risk. Further, while Members are required to receive pre-approval from the Standards Committee before they travel, it is the Member, and not the Standards Committee, that is ultimately accepting the travel from a private sponsor. The Board reads the pre-clearance process as a free-standing requirement the House adopted in 2007. There is no indication that the House intended it to supplant, or at the very least to completely supplant, Members' responsibility to abide by the travel rules when they accept privately sponsored travel. As a result, it is the Board's view that a reasonable reading of the travel rules places responsibility for identifying the sponsor with both the Member and the Standards Committee and not the Standards Committee alone. This shared responsibility also reflects the practical reality that, because the Member actually takes the trip, and the Standards Committee does not, the Member may, in certain cir-

[18] Memorandum of Interview of Representative Bennie Thompson (May 6, 2009) (Exhibit 2 at 09–2222—26).

[19] Photographs taken at the 13th Annual Caribbean Multi-National Business Conference (Exhibit 5 at 09–2222—62).

[20] Memorandum of Interview of Representative Bennie Thompson (May 6, 2009) (Exhibit 2 at 09–2222—28).

[21] *Id.* at 09–2222—27.

cumstances, have access to information about the trip not available to the Standards Committee. In this instance, the Member's had information about the sponsors of the conference not available to the Standards Committee, namely that numerous corporations were identified as sponsors of the conference.

32. Further, as described below, these other entities were, in fact, sponsors of the conference.

B. CARIB NEWS ALSO SPONSORED CONGRESSMAN THOMPSON'S TRAVEL

33. Karl Rodney is the publisher of the CARIB NEWS, a weekly newspaper published in New York. He also identified himself as the CEO of the Carib News Foundation on the Private Sponsor Travel Certification described above.[22]

34. According to Mr. Rodney, "general funds" of CARIB NEWS were "pooled" with payments from corporate sponsors, made both to CARIB NEWS and the Carib News Foundation and fees from attendees at the conference to pay conference expenses including "travel" and "hotel payments."[23]

35. Therefore, CARIB NEWS was also effectively a sponsor of Congressman Thompson's trip.

C. CORPORATE DONATIONS WERE EARMARKED FOR THE CONFERENCE

36. *According to the House Ethics Manual:*

> *The rule and implementing regulations are concerned with the organization(s) or individual(s) that actually pay for travel. Thus, for example, when a nonprofit organization pays for travel with donations that were earmarked, either formally or informally, for the trip, each such donor is deemed a—private source for the trip and (1) must be publicly disclosed as a trip sponsor on the applicable travel forms and (2) must itself be required to satisfy the above standards on proper sources of travel expenses.*

37. In the course of conducting its review, the OCE has learned that the Carib News Foundation solicited earmarked funds for the conference. For example, Carib News Foundation sent a solicitation letter to Citigroup, Inc.[24]

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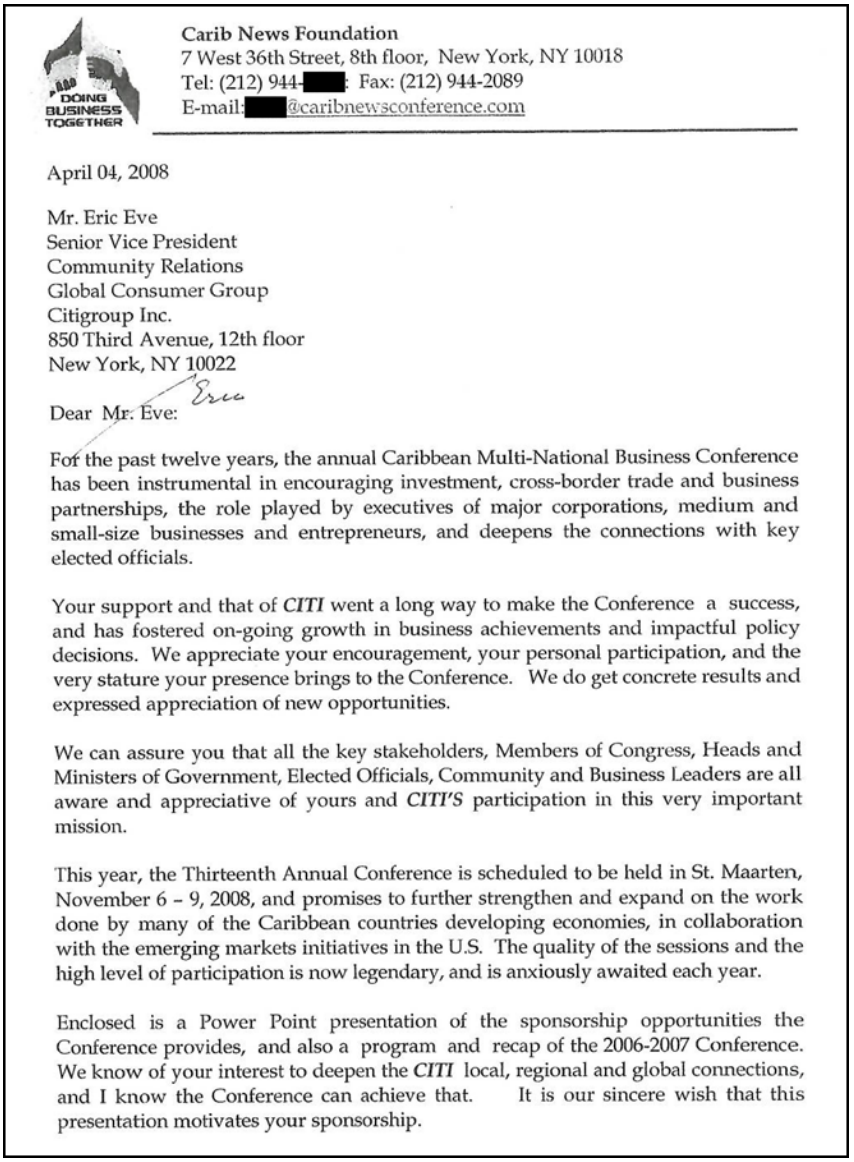
[22] Private Sponsor Travel Certification Form signed by Karl Rodney (Oct. 3, 2008) (Exhibit 1 at 09–2222—10).

[23] Letter from Joel Cohen, Counsel for Karl Rodney (May 18, 2009) (Exhibit 6 at 09–2222—72).

[24] Letter from Carib News Foundation to Mr. Eric Eve, Citigroup, Inc. (Apr. 4, 2008) (Exhibit 7 at 09–2222—77–78) (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-[redacted] Fax: (212) 944-2089
E-mail:[redacted]@caribnewsconference.com

April 04, 2008

Mr. Eric Eve
Senior Vice President
Community Relations
Global Consumer Group
Citigroup Inc.
850 Third Avenue, 12th floor
New York, NY 10022

Dear Mr. Eve:

For the past twelve years, the annual Caribbean Multi-National Business Conference has been instrumental in encouraging investment, cross-border trade and business partnerships, the role played by executives of major corporations, medium and small-size businesses and entrepreneurs, and deepens the connections with key elected officials.

Your support and that of *CITI* went a long way to make the Conference a success, and has fostered on-going growth in business achievements and impactful policy decisions. We appreciate your encouragement, your personal participation, and the very stature your presence brings to the Conference. We do get concrete results and expressed appreciation of new opportunities.

We can assure you that all the key stakeholders, Members of Congress, Heads and Ministers of Government, Elected Officials, Community and Business Leaders are all aware and appreciative of yours and *CITI'S* participation in this very important mission.

This year, the Thirteenth Annual Conference is scheduled to be held in St. Maarten, November 6 - 9, 2008, and promises to further strengthen and expand on the work done by many of the Caribbean countries developing economies, in collaboration with the emerging markets initiatives in the U.S. The quality of the sessions and the high level of participation is now legendary, and is anxiously awaited each year.

Enclosed is a Power Point presentation of the sponsorship opportunities the Conference provides, and also a program and recap of the 2006-2007 Conference. We know of your interest to deepen the *CITI* local, regional and global connections, and I know the Conference can achieve that. It is our sincere wish that this presentation motivates your sponsorship.

38. Attached to this solicitation letter was a PowerPoint presentation.[25] The presentation solicits money only for the conference and not for any other purpose, outlining the benefits of each level of sponsorship—Platinum, Gold, and Silver, along with lesser levels of sponsorship—in terms of the conference.[26] In each instance, the sponsorship covers travel related expenses such as gala events and meals.

[25] *Id.* at 09–2222—79–94.
[26] *Id.* at 09–2222—87–90.

PARTICIPATION

Platinum LEVEL - $75,000

- Keynote Speaker at Main Event
- Sponsor Private VIP Reception and specially arranged forum
- Special Awards Presentation
- Display, Exhibition and signage
- Area of Conference -Reserved for exclusive sponsorship
- Full page Ad in program
- Air Transportation for 2 people
- Accommodations: One Suite and One Standard Room
- Included in all printed materials
- Included in Internet promotion
- Display company logo and link to our website
- Sponsor of a Gala Event
- Sponsor and Participate in a workshop
- Representative listed in program with bio and photo

PARTICIPATION

GOLD LEVEL - $50,000

- Sponsor a Workshop
- Sponsor a Gala Event
- Display , Exhibition and signage
- Included in all Printed Material
- Included in all Internet Promotion
- Display of Company Logo and Link to Our Website
- Full Page Ad in Program
- Representation in the Brochure
- Air Transportation & room accommodations for 1

PARTICIPATION

SILVER LEVEL - $25,000

- Sponsor & Participate in a Workshop
- Display and Exhibition
- Banner in Public areas & at workshop
- Included in all printed materials
- Included in Radio and TV Promotions
- Included in the internet promotion
- Sponsor an event i.e. breakfast, lunch or dinner
- Full Page ad in program and recap
- Representatives listed in program with bio & photos
- Representatives listed in brochure

39. The OCE also learned that at least four of the corporations identified at the conference did in fact, make payments to the Carib News Foundation and CARIB NEWS (the newspaper) earmarked for the conference. The Carib News Foundation itself appears to be nothing more than a conduit in this case, and a partial one at that, for payments from corporations to support the conference. There is no evidence that the organization has filed a tax return with the IRS, under either Carib News Foundation or Carib News Charities, since 2005.[27] On its 2005 Form 990, the Carib News Foundation is shown as having no assets, no income and no expenses.[28] Not a single witness from a sponsor interviewed by the OCE knew of any other work of the Foundation. Indeed one witness, from IBM, was not aware that the Foundation played a role in the conference.[29]

40. **Citigroup.** Citigroup made a $75,000 payment to the CARIB NEWS for the conference.[30]

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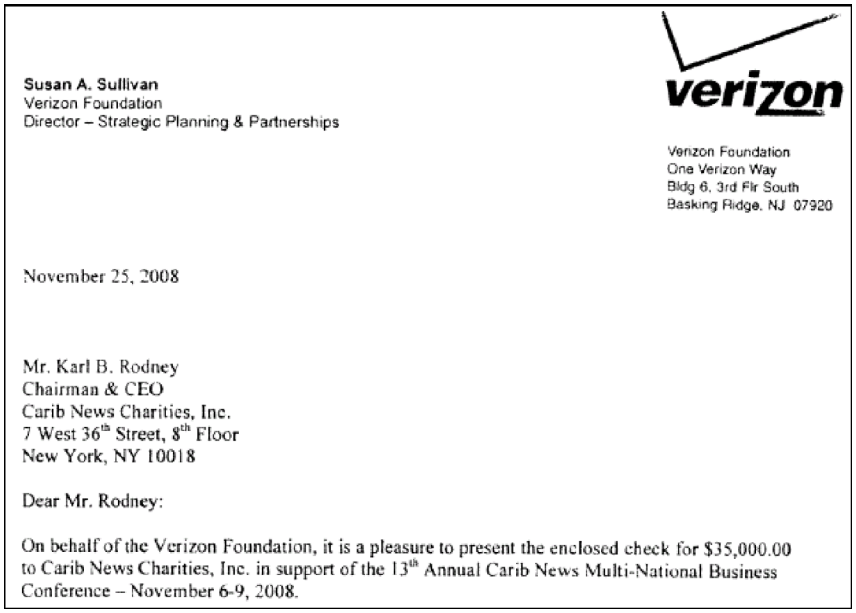
[27] Letter from IRS to OCE (April 17, 2009) (Exhibit 8 at 09–2222—98–115).

[28] *Id.* at 09–2222—98–115.

[29] Memorandum of Interview of Representative of IBM (May 8, 2009) (Exhibit 9 at 09–2222—119).

[30] Documents submitted to the OCE by Citigroup (Exhibit 7 at 09–2222—76).

41. **Verizon Foundation.** Verizon Foundation made a $35,000 payment to the Carib News Charities [31] for the conference.[32]



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

verizon

Verizon Foundation
One Verizon Way
Bldg 6, 3rd Flr South
Basking Ridge, NJ 07920

November 25, 2008

Mr. Karl B. Rodney
Chairman & CEO
Carib News Charities, Inc.
7 West 36th Street, 8th Floor
New York, NY 10018

Dear Mr. Rodney:

On behalf of the Verizon Foundation, it is a pleasure to present the enclosed check for $35,000.00 to Carib News Charities, Inc. in support of the 13th Annual Carib News Multi-National Business Conference – November 6-9, 2008.

42. Representative 1 of the Verizon Foundation said the Verizon Foundation funded the Carib News Foundation for the first time in 2008 and that the grant was issued to provide funding for the 13th Annual Caribbean Multi-National Business Conference.[33]

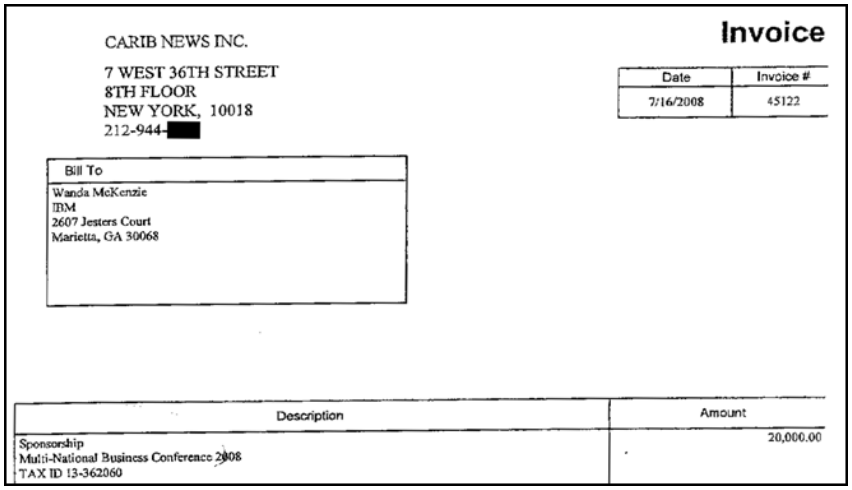
43. **IBM.** IBM made a $20,000 payment to Carib News Foundation for the conference as indicated on the invoice that CARIB NEWS, INC. (not Carib News Foundation) sent IBM.[34]

[31] Mr. Rodney accepted corporate payments under the names of three entities: The Carib News, the Carib News Foundation, and the Carib News Charities. According to the Secretary of State for the State of New York, the organization that currently operates as the Carib News Foundation originally operated under the name the Carib News Charities.

[32] Documents Submitted to the OCE by the Verizon Foundation (Exhibit 10 at 09–2222—122).

[33] Memorandum of Interview of Representative 1 of Verizon Foundation (Mar. 23, 2009) (Exhibit 11 at 09–2222—128).

[34] Documents submitted by IBM to the OCE (Exhibit 13 at 09–2222—142).



CARIB NEWS INC.

7 WEST 36TH STREET
8TH FLOOR
NEW YORK, 10018
212-944-[redacted]

Invoice

Date	Invoice #
7/16/2008	45122

Bill To

Wanda McKenzie
IBM
2607 Jesters Court
Marietta, GA 30068

Description	Amount
Sponsorship Multi-National Business Conference 2008 TAX ID 13-362060	20,000.00

44. **Macy's.** Macy's made a $35,000 payment to CARIB NEWS for the conference.[35]

45. **Pfizer.** Pfizer made a $25,000 payment to CARIB NEWS for the conference.[36]

46. Only American Airlines explicitly limited their sponsorship of the conference to individuals who were not elected officials, prohibiting CARIB NEWS from using any part of their sponsorship on Members of Congress and other government officials and their staff.[37] No other sponsor with whom we spoke placed restrictions on how or on whom their contribution could be spent. The only expectation was that the contribution would be used for expenses associated with the conference.

D. BECAUSE ENTITIES THAT EMPLOY OR RETAIN LOBBYISTS SPONSORED THE EVENT, CONGRESSMAN THOMPSON'S INVOLVEMENT SHOULD HAVE BEEN LIMITED TO ONE DAY

47. According to the House Ethics Manual:

> ***One-Day Event Trip.*** *The sole exception to the general prohibition on accepting officially-connected travel from a private source that retains or employs lobbyists or agents of a foreign principal is for trips involving attendance at or participation in one-day event (exclusive of travel time and an overnight stay). Under the rule, it is permissible for a Member or staff person to accept and meals related to* ***a single night's lodging*** *and meals related to the trip, if offered by the trip sponsor. Members and staff must limit their involvement in connection with the event to* ***a single calendar day,*** *exclusive of travel time and an overnight stay. A Member or staff person may therefore at-*

[35] Memorandum of Interview of Representative 1 of Macy's (Exhibit 20 at 09–2222—236).

[36] Interview with Investigative Counsel on May 22, 2009.

[37] Documents submitted by American Airlines to the OCE (Exhibit 14 at 09–2222—145) and OCE Investigative Counsel interview with American Airlines Representative (Mar. 5, 2009) (American Airlines provided an in-kind contribution in the form of ten roundtrip tickets to be used by Carib News in any manner they chose with the exception that no ticket could be used for an elected official or the official's staff or family. The estimated value of their contribution was between $6,200 and $7,500).

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 officially-connected activities such that a second night's stay is necessary to accomplish the purpose of the trip, or other exceptional circumstances that are described in detail by the traveler. The traveler will be personally responsible for any expenses incurred beyond those allowed by the Committee in connection with the second night's stay.*[38]

48. Citigroup, IBM and Verizon employ or retain lobbyists.[39]

49. Congressman Thompson spent four days at the conference at the expense of the third-party.[40]

50. There is substantial reason to believe that Congressman Thompson violated *House Rule 25, clause 5(b)(1)(C)* by accepting trip-related reimbursements from entities that employ or retain lobbyists for participating in an event for more than one day.

E. THE GOVERNMENT OF ST. MAARTEN MADE IN-KIND DONATIONS TO THE 2008 CONFERENCE AND PLAYED A SIGNIFICANT ROLE IN PLANNING, ORGANIZING AND CONDUCTING THE 2008 CONFERENCE

51. The Government of St. Maarten was the host of the 2008 conference.

52. In that capacity, the Government of St. Maarten provided in-kind donations to support the conference and also had a substantial role in planning the conference. As a result, it was effectively a sponsor of the 2008 conference.[41]

53. Rodney provided the Leader of Government of St. Maarten, Commissioner Sarah Wescott-Williams, with a list of "Basic Requirements to Host Caribbean Multi-National Business Conference."[42] These included:

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[38] House Ethics Manual at 92–93 (citing House Rule 25, clause 5(b)(1)(C)) (emphasis in original)).

[39] Clerk of the House of Representatives Lobbying Disclosure Report 2008 (excerpt attached hereto as "Exhibit 15" at 09–2222—151–156).

[40] Member/Officer Post-Travel Disclosure Form signed by Representative Bennie G. Thompson (Dec. 5, 2008) (Exhibit 1 at 09–2222—2).

[41] In 2007, the "host" of the conference was the Government of Antigua and Barbuda. In the event that the Government of Antigua and Barbuda provided the same support as St. Maarten did in 2008, then the members may have accepted gifts from a foreign government which would have been reportable under the Foreign Gift and Decorations Act. In addition, if the Government of Antigua provided these gifts to the Members, and if they were more than $335 in value, then the Members should have disclosed them on their financial disclosure form for 2007, which was filed in May 2008.

[42] Letter from Karl Rodney to Commissioner Sarah Wescott-Williams (Aug. 13, 2008) (Exhibit 16 at 09–2222—158).

- To provide the care and comfort for the VIP's attending i.e.
  - To provide 25 all-inclusive rooms for the VIP's and members of Congress attending.
  - To provide appropriate mode of transportation for VIP's and members of Congress – cars or specialized vans – not buses.
- To be a designated sponsor in one of the categories- *Title, Main or Regular Sponsor* (See Attachment)
- To organize a "Host Country Evening" – The Friday evening, the host country will host at an appropriate location an evening of food, refreshment, cultural presentation and entertainment.
- Provide for local entertainment for the various functions –
  - The Opening Ceremonies
  - The Reception
  - The Gala Dinner
- To assist in Promotion and Publicity of the conference both locally and through international offices and official publications.
- Assist in securing competitive hotel rates.
- Equip and staff conference secretariat.
- Prime Minister to issue invitations along with CARIB NEWS to members of the US Congress, other Prime Ministers and Ministers of Government.
- Participate in the Forum with Members of Congress.
- Arrange tours and activities of interest for VIP's and/or their spouse.

54. According to a statement from Mr. Rodney submitted to the OCE, the Government of St. Maarten, (1) developed local Host Committees to facilitate local planning; (2) helped negotiate the rate with the hotel, (3) assisted in developing the theme of the Conference, (4) assisted in identifying local speakers, including the Leader of Government, (5) assisted in local publicity, (6) provided local entertainment, including a school choir and cultural items, (7) arranged Host Country Evening on Friday, November 8 (the whole group was transported to another property for refreshments and entertainment), (8) helped with local transportation for some CARIB NEWS employees and helped arrange accommodations for some guests (not paying for such accommodations), (9) participated as event speakers, and (10) issued invitations to attend to specially invited guests.[43] These contributions to the conference were all in-

[43] Letter from Joel Cohen, Counsel for Karl Rodney (May 18, 2009) (Exhibit 6 at 09–2222—72–73).

kind, according to Mr. Rodney, and he did not provide an estimated value for them.[44]

55. In addition, because these donations to the conference are from a foreign government, Members are required to take certain actions under the Foreign Gifts and Decorations Act.[45]

56. Representative Thompson told the OCE that he was unaware of what role the Government of St. Maarten played in the conference.[46]

III. Role of the Chair's Counsel in the Approval of the 12th Annual Caribbean Multi-National Business Conference in 2007

57. As previously stated, Congressman Thompson told the OCE that he relied on the Standards Committee to determine who the true sponsor of the conference was based on information the Standards Committee received from the organization that invited him to the conference—the Carib News Foundation.[47] In the course of the Board's review, the OCE requested documents from Mr. Karl Rodney, the CEO of the Carib News Foundation. Mr. Rodney voluntarily submitted documents to the OCE that included, among other things, communication with certain members of the staff of the Committee on Standards of Official Conduct in 2007. The contents of these documents from 2007 are relevant because they indicate the role of the corporations was concealed from the Committee in 2008.

58. The Board requested that the Committee provide the information submitted to it for 2008 and the Committee declined to do so.

59. The documents submitted by Mr. Rodney show that in 2007 the CARIB NEWS initially identified, on several occasions, other corporations as sponsors of the Conference. The designation of these corporate entities as sponsors presented a problem for CARIB NEWS and the Members who wished to attend the conference insofar as their attendance would be limited to one day. In 2007, as a result of changes in the travel rules, a Member could not, in most instances, participate in an event (such as a conference) for more than one day if their travel to and participation in the event was paid for by an entity that employed or retained a lobbyist.[48] Many of the corporate entities who sponsored the 2007, as well as the 2008 conference, employed or retained lobbyists. Although CARIB NEWS initially identified these entities as sponsors, following interactions with the counsel to the then-chair of the Committee, apparently without the knowledge of the Standards Committee staff attorney assigned to review the trip, the documents identifying these organizations as sponsors were changed.

60. Subsequently, in 2008, the Carib News Foundation submitted documents that omitted the role of these other corporations as sponsors of the conference. Further, the staff attorney assigned to

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[44] *Id.*

[45] 5 U.S.C. § 7342.

[46] Memorandum of Interview of Representative Bennie Thompson (May 6, 2009) (Exhibit 2 at 09–2222—28).

[47] *Id.*

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

review the trip in 2008 was not the same staff attorney that reviewed the trip in 2007.

61. The earliest communication between CARIB NEWS or the Carib News Foundation and anyone associated with the Ethics Committee in the documents submitted to the OCE from Mr. Rodney is an e-mail dated September 17, 2007 from Patricia Louis, an Executive Assistant at CARIB NEWS, to Dawn Kelly Mobley, Counsel to the then-Chair of the Ethics Committee.[49]

62. The next day, on September 18, 2007, Ms. Mobley responded and asked for "any information on your sponsor's status."[50]

63. That same day Ms. Louis responded, indentifying multiple corporations as "sponsors" of the trip.[51]

> **We had received the forms from Shelley.**
> **The sponsors to date are : MACYS, PFIZER, AMERICAN AIRLINES, GOLDEN KRUST BAKERY, CARIBBEAN FOOD DELIGHTS, PREFERRED HEALTH PARTNERS, IBM, AT&T/CINGULAR**
>
> **Regards**
>
> Patricia Louis
> Executive Assistant
> CARIB NEWS
> 7 West 36th Street, 8th Floor
> New York, NY 10018

64. In response that same day, Ms. Mobley asked, "[d]o any of these organizations have or retain a lobbyist'"[52]

65. The next day, Ms. Mobley further responded asking Ms. Louis whether she, Ms. Mobley, should "assume" the sponsor was CARIB NEWS, despite the fact that Ms. Louis had not identified CARIB NEWS as a sponsor.[53] The Board notes that in her e-mail, Ms. Louis did not identify CARIB NEWS as a sponsor. Further, Ms. Mobley acknowledged that she had been told corporations identified by Ms. Louis were "sponsoring food and other parts of the Antigua travel." Under House rules in place at the time, and under current rules, sponsoring a meal makes these corporations sponsors of a Member's travel.[54] The Board also notes Ms. Mobley's use of the phrase "safe review," which the Board takes to mean a review which results in approval of the trip.

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[49] E-mail from Patricia Louis to Dawn Kelly Mobley (Sept. 17, 2007, 3:47 PM EST) (Exhibit 17 at 09–2222—208) (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.).

[50] E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 18, 2007, 12:57 PM EST) (Exhibit 17 at 09–2222—208).

[51] E-mail from Patricia Louis to Dawn Kelly Mobley (Sept. 18, 2007) (Exhibit 17 at 09–2222—208). (The Board notes that while the document that contains the e-mail does not have a header which indicates a date and time, both the e-mail before it and responding to it are dated September 18, 2007).

[52] E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 18, 2007, 7:03 PM EST) (Exhibit 17 at 09–2222—207).

[53] E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 19, 2007, 2:16 PM EST) (Exhibit 17 at 09–2222—207).

[54] House Ethics Manual (2008) at 97–98.

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

Patricia:

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

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

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

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

66. Later in the afternoon on September 19, 2007, Ms. Mobley sent Ms. Louis another e-mail where she discussed the limitations posed by the new travel rules the House had adopted in 2007. Ms. Mobley told Ms. Louis, "the new rules might prohibit some things you were able to do with so many different sponsors in the past." Thus, Ms. Mobley again acknowledged that these corporations were sponsors and that the new travel rules affected the nature of their participation in the trip.[55]

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Wednesday, September 19, 2007 3:23 PM
To: plouis
Subject: RE: Draft Program - 2007Business Conference (No agenda or program attached)

Lastly, just send the sponsor form asap for review. The new rules might prohibit some things you were able to do with so many different sponsors in the past, but until we get the form, we can't make the most informed decision. I have let the Congresswomen know we are awaiting your sponsor form. Just as you do, they would also like assurance. Thank you.

67. On September 21, 2007, Ms. Louis responded.[56]

[55] E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 19, 2007, 3:23 PM EST) (Exhibit 17 at 09–2222—207).
[56] E-mail from Patricia Louis to Dawn Kelly Mobley (Sept. 21, 2007, 1:56 PM EST) (Exhibit 17 at 09–2222—205).

Registration

From: plouis [[redacted]@nycaribnews.com]
Sent: Friday, September 21, 2007 1:56 PM
To: 'Dawn.KellyMobley@mail.house.gov'
Subject: Re Sponsorship information

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

The CARIB NEWS FOUNDATION does not retain or employ a registered lobbyist or registered foreign agent.

Please use me as your contact for the purposes of this Conference.

The form will be emailed to you this afternoon.

Regards
Patricia Louis

Executive Assistant
CARIB NEWS
7 West 36th Street, 8th Floor
New York, NY 10018

68. That same day, on September 21, 2007, Ms. Louis faxed Ms. Mobley a Private Sponsor Travel Certification Form. On the form Carib News Foundation is listed as the sponsor of the trip in question 1.[57]

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

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM
(provide directly to each House invitee)

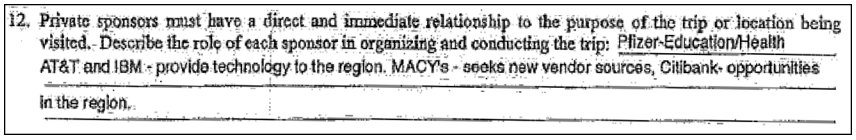
This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers or employees under House Rule XXV, clause 5. A completed copy of the form (and any attachments) should be provided to each invited House Member, officer or employee, who 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.*

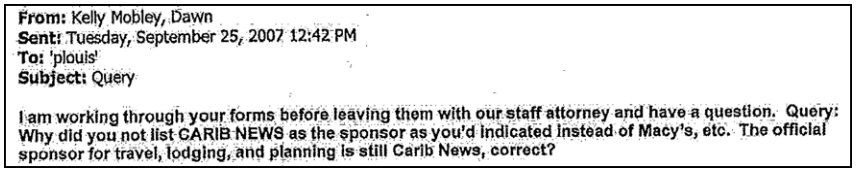
1. Sponsor(s) (who will be paying for the trip): CARIB NEWS FOUNDATION

69. However, the Carib News Foundation listed a number of corporations as private sponsors, each with responsibility for planning and conducting the trip, in question 12.[58] This is at least the second instance where the Carib News Foundation identified these corporations as the trip's sponsors.

[57] Private Sponsor Travel Certification Form (Sept. 21, 2007) (Exhibit 17 at 09–2222—195).
[58] *Id.*

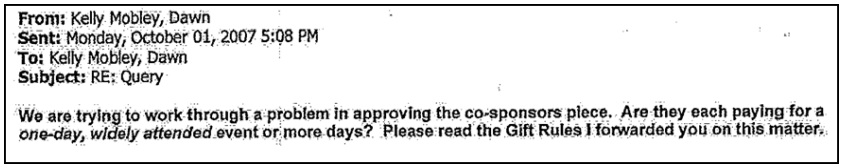

12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip: Pfizer-Education/Health
AT&T and IBM - provide technology to the region. MACY's - seeks new vendor sources,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

70. This prompted the following e-mail from Ms. Mobley to Ms. Louis.[59] The Board notes that Ms. Mobley stated she was "working through" the Carib News Foundation's forms "before leaving them with our staff attorney."


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

I am working through your forms before leaving them with our staff attorney and have a question. Query: Why did you not list CARIB NEWS as the sponsor as you'd indicated instead of Macy's, etc. The official sponsor for travel, lodging, and planning is still Carib News, correct?

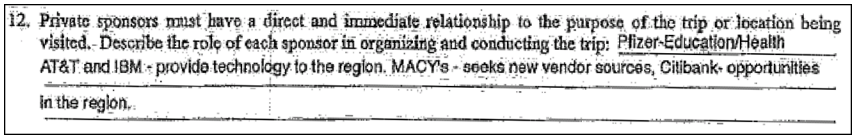
71. Later that same day, Ms. Mobley queried further.[60] At least as of this date, following at least two instances where Ms. Louis identified these corporations as sponsors, Ms. Mobley appeared to treat these entities as "co-sponsors."


From: Kelly Mobley, Dawn
Sent: Monday, October 01, 2007 5:08 PM
To: Kelly Mobley, Dawn
Subject: RE: Query

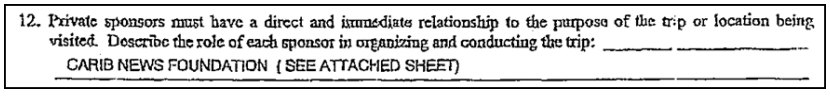
We are trying to work through a problem in approving the co-sponsors piece. Are they each paying for a *one-day, widely attended* event or more days? Please read the Gift Rules I forwarded you on this matter.

72. On October 3, 2007, Ms. Mobley informed Ms. Louis that Susan Olson was the staff attorney assigned to review the trip.[61]

73. A copy of the Private Sponsor Travel Certification Form provided to a Member's office on October 5, 2007, shows that by October 5, 2007, following its interaction with Ms. Mobley, Carib News Foundation changed its answer to question 12 regarding other private sponsors. As previously highlighted, as of September 21, 2007, Carib News Foundation provided the following answer to question 12.[62]


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

74. However, as of October 5, 2007, it provided a different answer to question 12.[63]


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)

[59] E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 25, 2007, 12:42 PM EST) (Exhibit 17 at 09–2222—192).
[60] E-mail from Dawn Kelly Mobley to Patricia Louis (Sept. 25, 2007, 5:08 PM EST) (Exhibit 17 at 09–2222—192).
[61] E-mail from Dawn Kelly Mobley to Patricia Louis (Oct. 3, 2007, 12:39 PM EST) (Exhibit 17 at 09–2222—185).
[62] Private Sponsor Travel Certification Form (Sept. 21, 2007) (Exhibit 17 at 09–2222—196).
[63] Private Sponsor Travel Certification Form (Oct. 5, 2007) (Exhibit 18 at 09–2222—211).

And the attached sheet provided the following information.[64]

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[65] (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: [redacted]@nycaribnews.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

[64] *Id.* at 09–2222—215
[65] E-mail from Susan Olson to Patricia Louis (Oct. 10, 2007, 4:01 PM EST) (Exhibit 17 at 09–2222—177–178).

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

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

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

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

> The Foundation, which is a 501(c)(3) nonprofit organization, will be paying for the Members' travel expenses including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a "contribution to the overall pool of expenses in contribution to the [Foundation]," which is used to "underwrite the overall expenses of the Conference," primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organization who will be attending and participating in the Conference.
>
> Accordingly, the Committee's Advisory Opinion, dated October 27, 2006, provided that all of the organizations that provided financial underwriting for the trip along with the Foundation were required to be listed as the "trip sponsors" on the participating Members' post-travel disclosure form and their 2006 annual financial disclosure statements.

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

Susan L. Olson
Counsel
House Committee on Standards of Official Conduct

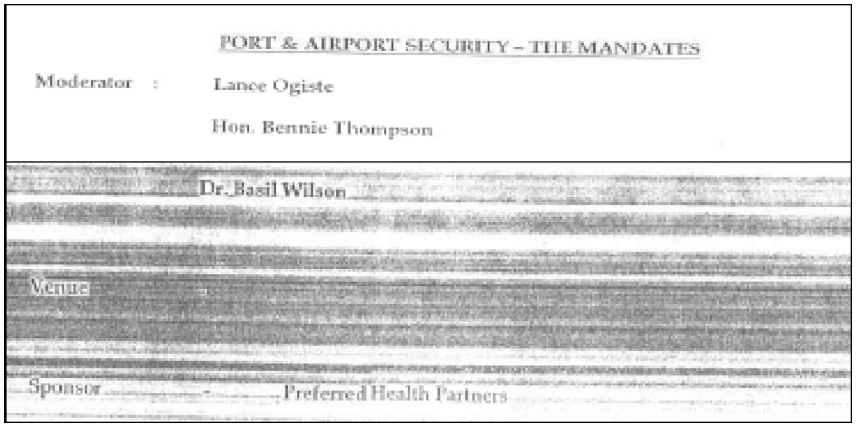
75. The Committee's Advisory Opinion dated October 27, 2006 indicates, as Ms. Olson wrote, that Carib News Foundation told the Standards Committee in 2006 that there were several corporate entities that sponsored the conference.[66] The "Advisory Opinion" did not conclude that these entities were, in fact, the trip's sponsors, as the e-mail seems to indicate.

76. A draft agenda for the conference dated October 3, 2007, identified a "sponsor" for each event listed.[67] This appears to be the version of the agenda that Olson is referring to in her e-mail. For example, "Preferred Health Partners" is identified as the sponsor of this event on "Port & Airport Security—The Mandates."[68]

[66] Committee on Standards of Official Conduct, Advisory Opinion (Oct. 27, 2006) (Exhibit 17 at 09–2222—201–203).

[67] Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 3, 2007) (Exhibit 19 at 09–2222—217).

[68] *Id.* at 09–2222—222–223.


PORT & AIRPORT SECURITY – THE MANDATES

Moderator : Lance Ogiste

Hon. Bennie Thompson

Dr. Basil Wilson

Venue

Sponsor Preferred Health Partners

And Citi is identified as the sponsor of this event on "Community Outreach—Education—Access and Collaboration."[69]

4:00pm – 5:30pm	-	COMMUNITY OUTREACH –
		EDUCATION – ACCESS AND COLLABORATION
Venue:	-	Off Site
Sponsor	-	CITI
Moderator:	-	Michael Flanigan
Speakers:	-	Dr. Edison Jackson – President Medgar Evers College
		Hon. Danny Davis – Member of Congress
		Hon. David M. Dinkins – Former Mayor New York City
		Hon. Eddie Bernice Johnson – Member of Congress
		Hon. Bertrand Joseph

77. Ms. Louis forwarded Ms. Olson's e-mail to Ms. Mobley, Congressman Charles Rangel's Chief of Staff George Dalley and Delegate Donna Christensen's scheduler Shelley Thomas, and asked them to advise her on a response.[70]

[69] *Id.* at 09–2222—229.

[70] E-mail from Patricia Louis to Dawn Kelly Mobley, George Dalley, and Shelley Thomas (Oct. 10, 2007, 5:56 PM EST) (Exhibit 17 at 09–2222—183).

-----Original Message-----
From: plouis <[redacted]@nycaribnews.com>
To: Kelly Mobley, Dawn; Thomas, Shelley; Dalley, George
Sent: Wed Oct 10 17:56:25 2007
Subject: FW: Carib News - Pre-trip Approval issues

Please see e-mail I received from Ms. Olson of the Committee on Standards of Official Conduct.

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

Please advise us.

Regards and Thanks

Ms. Louis appears to be pre-clearing her response to questions posed by the Standards Committee staff attorney. There is no indication that the staff attorney knew that the answer to her question had already been discussed with the counsel to the then-chair of the Standards Committee. Substantively, based on documents obtained by the OCE and interviews with sponsors, the statement "the sponsors contribute to the overall expense of the trip" appears to be true. However, the statement "and the general work of the Foundation," does not appear to be true. All of the sponsors OCE interviewed stated unequivocally that the contribution was intended for the conference.[71]

78. Less than an hour later Ms. Mobley responded.[72] The Board notes Ms. Mobley's concern with whether any of the corporate sponsors paid for an event and also retained a lobbyist" and her conclusion that if they did, Members of Congress could only attend for one day.

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Wednesday, October 10, 2007 6:49 PM
To: [redacted]@nycaribnews.com
Subject: Re: Carib News - Pre-trip Approval issues

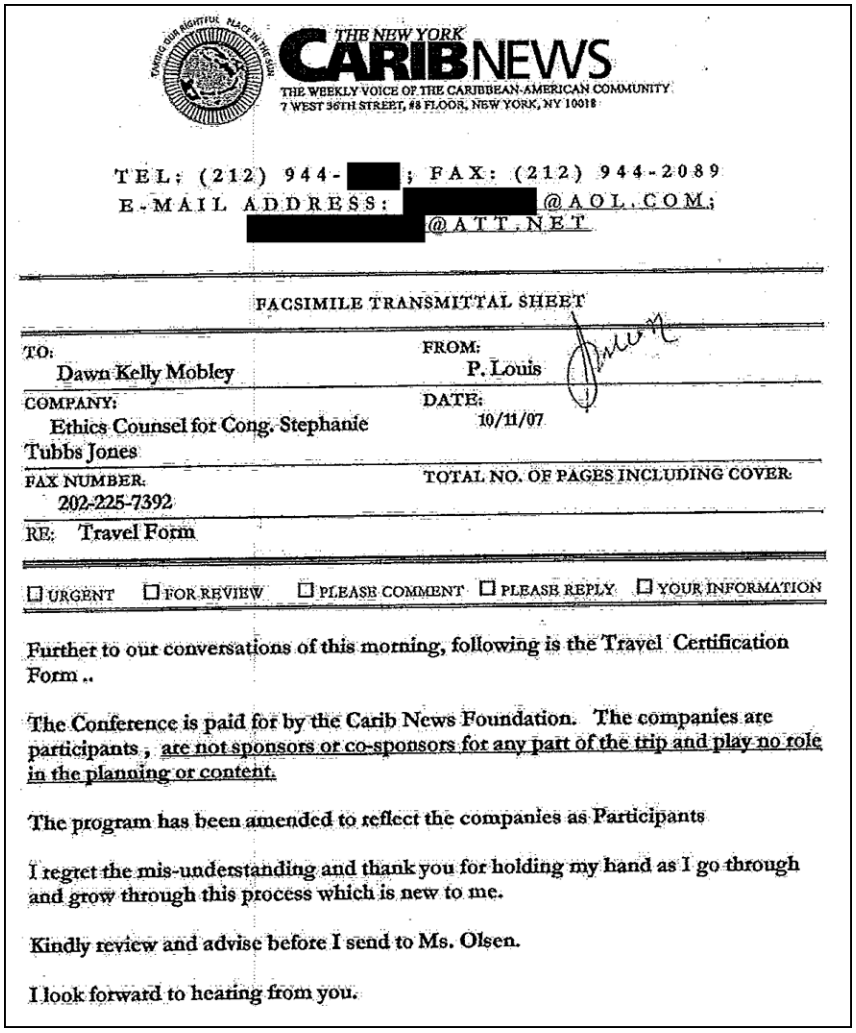
Her question centers on whether any of these "co-sponsors" retains a lobbyist or foreign. This is the issue you and I focused on previously. It is a central problem if any do and are paying for the events. If so, you are in the same position as last year with one-day events. Call Susan back tomorrow 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

[71] Memorandum of Interview of Representative of IBM (May 8, 2009) (Exhibit 9); Memorandum of Interview of Representative 1 of the Verizon Foundation (Mar. 23, 2009) (Exhibit 11); Memorandum of Interview of Representative of Citi (Mar. 17, 2009) (Exhibit 4); Memorandum of Interview of Representative 1 of Macy's (May 28, 2009) (Exhibit 20).

[72] E-mail from Dawn Kelly Mobley to Patricia Louis (Oct. 10, 2007, 6:49 PM EST) (Exhibit 17 at 09–2222—183).

79. Ms. Louis then faxed Ms. Mobley.[73] The Board notes that Ms. Louis again appears to be pre-clearing her responses to the staff attorney, Ms. Olson, with Ms. Mobley ("Kindly review and advise before I send to Ms. Olson.").



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7 WEST 36TH STREET, #8 FLOOR, NEW YORK, NY 10018

TEL: (212) 944-[redacted]; FAX: (212) 944-2089
E-MAIL ADDRESS: [redacted]@AOL.COM;
[redacted]@ATT.NET

FACSIMILE TRANSMITTAL SHEET

TO: Dawn Kelly Mobley
FROM: P. Louis
COMPANY: Ethics Counsel for Cong. Stephanie Tubbs Jones
DATE: 10/11/07
FAX NUMBER: 202-225-7392
TOTAL NO. OF PAGES INCLUDING COVER:
RE: Travel Form

☐ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ YOUR INFORMATION

Further to our conversations of this morning, following is the Travel Certification Form ..

The Conference is paid for by the Carib News Foundation. The companies are participants , are not sponsors or co-sponsors for any part of the trip and play no role in the planning or content.

The program has been amended to reflect the companies as Participants

I regret the mis-understanding and thank you for holding my hand as I go through and grow through this process which is new to me.

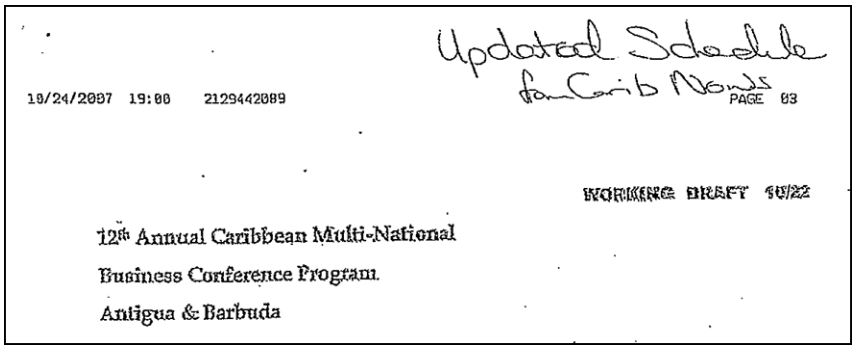
Kindly review and advise before I send to Ms. Olsen.

I look forward to hearing from you.

80. The Board further notes that Ms. Louis represented that, "the program has been amended to reflect the companies as Participants," an action taken following Ms. Louis' interactions with Ms. Mobley. A copy of the revised agenda was submitted by another Member of Congress who attended the conference.[74] The Board notes that this "updated" schedule changed the label applied to "sponsors" to "participants" and in some cases deleted any mention

[73] Fax from Patricia Louis to Dawn Kelly Mobley (Oct. 11, 2007) (Exhibit 17 at 09–2222—180).
[74] Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 22, 2007) (Exhibit 21 at 09–2222—238).

of the corporate entity that had previously been identified as a "sponsor."



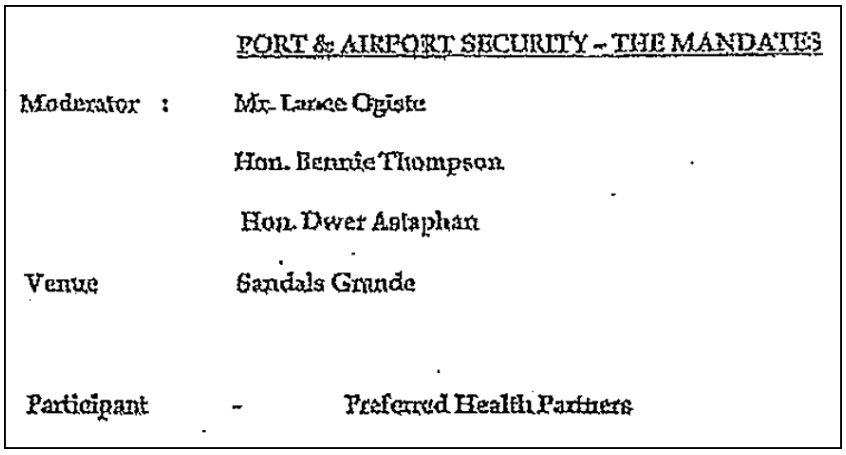
Updated Schedule for Carib Nov 25

10/24/2007 19:00 2129442089 PAGE 03

WORKING DRAFT 10/22

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

81. This event was previously identified in the earlier draft as being "sponsored" by Preferred Health Partners.[75] Now it identifies them as merely a "participant."[76]



PORT & AIRPORT SECURITY – THE MANDATES

Moderator : Mr. Lance Ogiste

Hon. Bernie Thompson

Hon. Dwer Astaphan

Venue Sandals Grande

Participant - Preferred Health Partners

82. In another example, the Board notes that the following event was previously identified as being sponsored by CITI.[77] Now CITI is not even mentioned.[78] Michael Flanigan, the moderator, was an executive at CITI at the time and represented the company at the conference.[79]

[75] Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 3, 2007) (Exhibit 19 at 09–2222—222–223).
[76] Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 22, 2007) (Exhibit 21 at 09–2222—242).
[77] Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 3, 2007) (Exhibit 19 at 09–2222—229).
[78] Working Draft of the 13th Annual Caribbean Multi-National Business Conference Program (Oct. 22, 2007) (Exhibit 21 at 09–2222—248).
[79] Memorandum of Interview of Representative of Citi (Mar. 17, 2009) (Exhibit 4).

5:00pm – 6:30pm	–	COMMUNITY OUTREACH –
		EDUCATION & YOUTH DIRECTION – ACCESS AND COLLABORATION
Venue:	-	Multipurpose Cultural & Exhibition Center
Moderator:	-	Michael Flanigan
Speakers:	-	Dr. Edison Jackson – President Medgar Evers College
		Hon. David M. Dinkins – Former Mayor New York City
		Hon. Eddie Bernice Johnson – Member of Congress
		Hon. Bertrand Joseph

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

84. That same day, October 11, 2007, Ms. Louis responded to Ms. Olson, stating that "[t]he sponsors contribute to the overall expense of the trip."[80] The Board notes that this is precisely the answer she had pre-cleared with Mobley.

From: plouis [mailto:[redacted]@nycaribnews.com]
Sent: Thursday, October 11, 2007 10:33 AM
To: Olson, Susan
Subject: RE: Carib News - Pre-trip Approval Issues

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

No federally registered lobbyist or foreign agent will be accompanying the Members or
participating in the program.

Regards

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

85. Ms. Olson then forwarded her exchange with Ms. Louis to Bill O'Reilly, the Staff Director and Chief Counsel of the Ethics Committee at that time, and to Dawn Mobley.[81] Based on this e-mail, it appears that Ms. Olson was unaware that Mobley had been

[80] E-mail from Patricia Louis to Susan Olson (Oct. 10, 2007, 10:33 AM EST) (Exhibit 17 at 09–2222—177).
[81] E-mail from Susan Olson to Bill O'Reilly and Dawn Kelly Mobley (Oct. 12, 2007 9:29 AM) (Exhibit 17 at 09–2222—177).

communicating directly with the Carib News Foundation. There is also no evidence that Ms. Mobley told her she had been involved in this manner. Witnesses for the various sponsors told the OCE that they did contribute funding directly to the trip (the conference) and in no case did they simply make donations to the "general funds" of the CARIB NEWS or the Carib News Foundation.[82]

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

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

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

86. Ms. Mobley then forwarded Ms. Olson's internal e-mail to Ms. Louis.[83] The Board notes that Ms. Mobley counseled that these "other organizations" can "participate" in the program but "should not help pay for the trip."

From: Kelly Mobley, Dawn
Sent: Friday, October 12, 2007 9:59 AM
To: '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).

87. Later that day, Ms. Mobley sent Ms. Louis an additional e-mail.[84] As previously stated, the sponsors whom the OCE interviewed all stated that they did not "support [the] foundation annually" and did specifically designate their donations for the 2007 conference. Either Ms. Mobley was repeating inaccurate information Ms. Louis had given her, or she was giving inaccurate information to Ms. Olson without prompting.

[82] Memorandum of Interview of Representative of IBM (May 8, 2009) (Exhibit 9); Memorandum of Interview of Representative 1 of the Verizon Foundation (Mar. 23, 2009) (Exhibit 11); Memorandum of Interview of Representative of Citi (Mar. 17, 2009) (Exhibit 4); Memorandum of Interview of Representative 1 of Macy's (May 28, 2009) (Exhibit 20).

[83] E-mail from Dawn Kelly Mobley to Patricia Louis (Oct. 12, 2007 9:59 AM EST) (Exhibit 17 at 09–2222—176).

[84] E-mail from Dawn Kelly Mobley to Patricia Louis (Oct. 12, 2007 1:55 PM EST) (Exhibit 17 at 09–2222—176).

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Friday, October 12, 2007 1:55 PM
To: plouis
Subject: RE: Confidential

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

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

88. Ms. Olson then sent Ms. Louis additional questions about the corporate entities previously identified as "sponsors." [85]

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

Ms. Louis,

Please explain 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.?

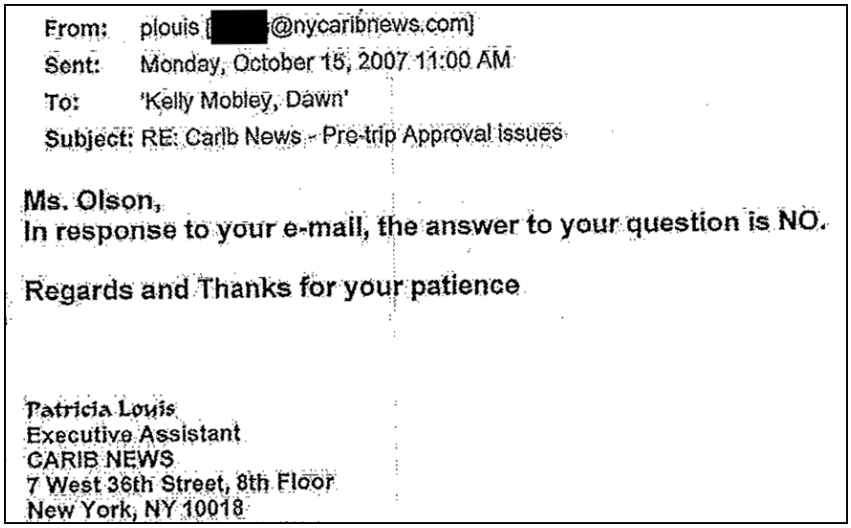
- Antigua Government
- Sandals
- Royal Caribbean Bakery
- CITI
- Pfizer
- Macy's
- AT&T
- HSBC
- IBM
- Goodworks International
- Preferred Health Partners
- Antigua & Barbuda
- American Airlines
- Golden Krust

Susan L. Olson
Counsel
House Committee on Standards of Official Conduct

89. Three days later, Ms. Louis sent an e-mail to Ms. Mobley, but addressed to Ms. Olson.[86] This may have been inadvertent or, based on their previous practice, Ms. Louis may have done this before she then sent it to Ms. Olson. This is the final communication regarding the 2007 conference provided to the OCE.

[85] E-mail from Susan Olson to Patricia Louis (Oct. 12, 2007 2:41 PM EST) (Exhibit 17 at 09–2222—171).

[86] E-mail from Patricia Louis to Dawn Kelly Mobley (Oct. 18, 2007 11:00 AM EST) (Exhibit 17 at 09–2222—170).



From: plouis [redacted]@nycaribnews.com]
Sent: Monday, October 15, 2007 11:00 AM
To: 'Kelly Mobley, Dawn'
Subject: RE: Carib News - Pre-trip Approval issues

Ms. Olson,
In response to your e-mail, the answer to your question is NO.

Regards and Thanks for your patience

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

90. In an interview with the OCE, a staff member of Representative Rangel's office, Staff Member 1 of Congressman Rangel's Office, described discussions with Ms. Louis and Ms. Mobley in 2007 on the topic of how the new travel rules would affect the Members' participation in the 2007 conference.[87] The staff member said that Ms. Louis, and Mr. and Mrs. Rodney told him that the then Chair of the Standards Committee had assigned her counsel on the Committee, Ms. Mobley, to "find a way" to allow Members of Congress to participate in the conference under the new travel rules passed by the House in 2007.[88] The staff member told the OCE that Congressman Rangel told him that the then-Chair had made similar statements to him.[89]

91. Staff Member 1 of Congressman Rangel's Office said the "framework" that was decided upon was that the Carib News Foundation would raise money from corporate donors who had previously sponsored the conference and that this money in turn would be deposited in a "common fund" that would then be used to pay for the conference. It was Staff Member 1 of Congressman Rangel's Office's understanding that if this was done, then Members of Congress could participate in the conference without any restrictions imposed by the new rules. Staff Member 1 of Congressman Rangel's Office said that it was important to break the link between the corporations and the conference under the new rules and that using the Foundation in this way would enable that to happen. Staff Member 1 of Congressman Rangel's Office said he learned of this new framework for the conference from Mr. and Mrs. Rodney and that they represented this approach had come from Ms. Mobley on the Standards Committee.[90]

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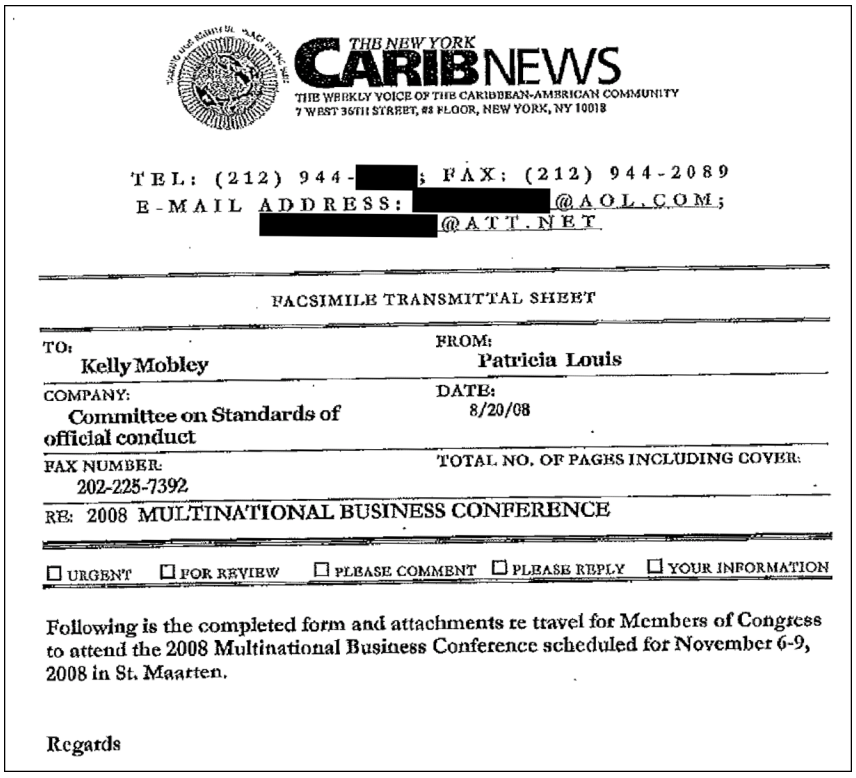
[87] Memorandum of Interview of Staff Member 1 of Congressman Rangel's Office (May 27–28, 2009) (Exhibit 22 at 09–2222—251–256).
[88] 1T3AId. at 09–2222—252.
[89] *Id.* at 09–2222—253.
[90] *Id.*

92. This conduct in 2007 is relevant to the present reviews for a number of reasons. First, in and of itself, the intervention of the Chair's counsel in this matter is troubling and more likely constituted an improper manipulation of the clearance process. Following Ms. Mobley's intervention, Carib News Foundation changed the Private Sponsor Travel Certification Form to delete any mention of private sponsors before it was sent to the Standards Committee's staff attorney assigned to review the matter. This occurred after Carib News Foundation had told Ms. Mobley that these corporations were sponsors of the conference on several occasions. Ms. Louis's initial, and presumably truthful, submissions regarding the conference described the corporate entities as sponsors. However, if the corporations were sponsors of the conference, as opposed to Carib News Foundation, then the Members of Congress ability to attend would have been limited because, the corporations, unlike the Carib News Foundation, employed or retained lobbyists. It appears from the correspondence between Ms. Mobley and Ms. Louis, and Ms. Olson's apparent ignorance of the correspondence, that Ms. Mobley assisted Ms. Louis in preparing inaccurate answers for Ms. Olson in order to ensure that Ms. Olson would approve the trip in a manner that would not limit the attendance of the Members of Congress. Ms. Mobley's involvement in the process seems to have prevented the Standards Committee and its staff from correctly performing its responsibilities. Ms. Olson's approval of the trip was predicated on an incomplete or inaccurate factual record, in which Ms. Mobley apparently was complicit, putting at risk those Members of Congress who relied on that approval.

93. The 2007 conduct and attendant misrepresentations appear to have directly influenced what occurred in 2008. When the Carib News Foundation submitted materials to the Standards Committee for their approval of the 2008 conference, the Carib News Foundation took the same approach that they had been counseled to take in 2007 and did not disclose the role of the corporate sponsors on the Private Sponsor Travel Certification Form or the conference agenda.

94. In fact, in 2008, Carib News Foundation again first submitted its document to Ms. Mobley.[91] 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.

[91] Fax from Patricia Louis to Dawn Kelly Mobley (Aug. 20, 2008) (Exhibit 23 at 09–2222—258).



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E-MAIL ADDRESS: [redacted]@AOL.COM;
[redacted]@ATT.NET

FACSIMILE TRANSMITTAL SHEET

TO: Kelly Mobley
FROM: Patricia Louis
COMPANY: Committee on Standards of official conduct
DATE: 8/20/08
FAX NUMBER: 202-225-7392
TOTAL NO. OF PAGES INCLUDING COVER:
RE: 2008 MULTINATIONAL BUSINESS CONFERENCE

☐ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ YOUR INFORMATION

Following is the completed form and attachments re ttavel for Members of Congress to attend the 2008 Multinational Business Conference scheduled for November 6-9, 2008 in St. Maarten.

Regards

IV. The Value of the Trip Reported on the Member's Post-Travel Disclosure Form

95. Under House Rule 25 clause 5(d), Members are required to obtain prior approval of the Standards Committee for trips where the Member's travel expenses will be reimbursed by a private source. The Standards Committee has adopted regulations, including a pre- and post-travel form Members must complete, pursuant to House Rule 25 clause 5(h)(i)(1)(B)[92] *that requires Members to publicly disclose "trip expenses."*

96. According to the House Ethics Manual, "[t]he rule and implementing regulations are concerned with the organization(s) or individual(s) that actually pay for travel." House Ethics Manual (2008) at 97.

97. There is substantial reason to believe that Congressman Thompson 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.

[92] 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

98. Carib News Foundation submitted a Private Sponsor Travel Certification Form to each Member it sponsored for the 2008 trip—Representatives Christensen, Kilpatrick, Payne, Rangel and Thompson.[93] This form was provided to each Member Office and then submitted by the Member Office to the Standards Committee as part of the pre-travel approval process.

21. TOTAL EXPENSES FOR EACH PARTICIPANT:

☐ 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 Local transportation
For each accompanying family member		

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

23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: [signature]

Name and title: KARL B. RODNEY, CEO

Organization: CARIB NEWS FOUNDTION

99. The Board notes that the Carib News Foundation provided the same exact dollar figure with very minor variations for each Member of Congress that attended the conference despite the fact that Carib News Foundation recognized on the same form that the Congressional travelers were travelling to and from different cities. In fact, the Congressional travelers came from St. Croix, U.S. Virgin Islands; Detroit, Michigan; Newark, New Jersey; New York, New York; and Jackson, Mississippi.

100. In addition, according to Mr. Rodney, the cost charged to "the public" to attend the conference for four days and three nights was $840 for double occupancy or $1085 for single occupancy. The cost of attendance included "room accommodations, meals, and admission to the Conference." However, these figures were not disclosed pre-travel to the Members or the Standards Committee, nor were these figures disclosed to the Members after the conference.[94]

[93] Private Sponsor Travel Certification Form signed by Karl Rodney (Oct. 3, 2008) (Exhibit 1 at 09–2222—10).

[94] Letter from Joel Cohen, Counsel for Karl Rodney (May 18, 2009) (Exhibit 6 at 09–2222—73).

B. INFORMATION REQUIRED FROM THE CONGRESSIONAL TRAVELER

101. On his Member/Officer Post-Travel Disclosure Form,[95] Representative Thompson certified his travel cost as the following:

9. **TRIP EXPENSES:** *Obtain actual dollar amounts from the sponsor. If exact dollar amounts are unavailable by the due date, provide a good faith estimate and file an amended form once the correct amounts are received.*

	Total Transportation Expenses	Total Lodging Expenses	Total Meal Expenses
For Member or Officer:	410.00	405.00	part of general program
For accompanying family member:	410.00	n/a	part of general program

	Other Expenses (dollar amount)	Specific Nature of Expenses (*e.g.*, taxi, parking, registration fee, etc.)
For Member or Officer:	175.00	Registration Fees and Ground Transportation
For accompanying family member:	n/a	n/a

I certify that the information contained in this form is true, complete, and correct to the best of my knowledge. I have determined that all of the expenses listed above were necessary and that the travel was in connection with my duties as a Member or Officer of the U.S. House of Representatives and would not create the appearance that I am using public office for private gain.

SIGNATURE OF MEMBER: Bennie G. Thompson

DATE: November 26, 2008

102. However, documents from Congressman Thompson's office show his airline ticket cost $750.15, not $410.[96]

---------- *Original message from "Jimerson, Jennifer" <jjimerson@mail.house.gov>:* ----------

Patricia,

Considering that the other options have several layovers the Congressman's preference would be the first itinerary with US Airways for $750.15. Congressman Thompson seating preferences is exit row aisle only and please seat him and Dr. Thompson together. Contact me if you have any questions.
Thanks,
Jennifer

103. In an interview with OCE, Congressman Thompson stated that he had been shown a list of flights and that he had chosen which flight he would take.[97]

[95] Member/Officer Post-Travel Disclosure Form signed by Representative Bennie G. Thompson (Dec. 5, 2008) (Exhibit 1 at 09–2222—3).

[96] E-mail from Jennifer Jimerson to Patricia Louis (Oct. 27, 2008, 8:27 PM EST) (Exhibit 24 at 09–2222—283).

[97] Memorandum of Interview of Representative Bennie Thompson (May 6, 2009) (Exhibit 2 at 09–2222—26).

V. CARIB NEWS FOUNDATION, AS A PRIVATE FOUNDATION, WAS PROHIBITED FROM PAYING FOR CONGRESSMAN THOMPSON'S TRAVEL

104. The Carib News Foundation is identified as the "sponsor" of this conference on at least three forms filed with the Committee on Standards of Official Conduct: (1) the "Private Sponsor Travel Certification Form"; (2) the "Privately Sponsored Travel: Travel Form," and (3) the "Member/Officer Post-Travel Disclosure Form."[98]

105. According to a query of the New York State's Office of the Secretary of State, Mr. Rodney appears to operate two organizations—the "Carib News, Inc" which operates a newspaper and the "Carib News Charities, Inc" which also may operate under the name "Carib News Foundation." The OCE has not been able to identify any additional activity, other than the annual Caribbean Multi-National Business Conference, in which the latter organization is involved. Furthermore, while "Carib News Charities, Inc"/ "Carib News Foundation" is listed with New York's Office of the Secretary of State as a domestic not-for-profit corporation, it is not listed, as required by law, with the New York State Charities Bureau. In addition, there is no evidence that the organization has filed a tax return with the IRS, under either name, since 2005.[99] According to Publication 78 of the IRS, a list of all charities claiming 501(c) status, Carib Charities, Inc is a private foundation.[100]

106. Every organization that qualifies for tax exemption described in section 501(c)(3) of the Internal Revenue Code is defined as a private foundation unless the organization falls into one of the categories specifically excluded from the definition under section 509(a).[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.

107. There are several restrictions that are placed on private foundations. At issue here is the restriction on "self-dealing" between a disqualified person (the definition of which includes Members of Congress) and a private foundation.[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

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[98] Member/Officer Post-Travel Disclosure Form signed by Representative Bennie G. Thompson (Dec. 5, 2008) (Exhibit at 09–2222—2).

[99] Letter from IRS to OCE (Apr. 17, 2009) (Exhibit 8 at 09–2222—98–115).

[100] Online Version of Publication 78 (Accessed online on June 5, 2009 at *http://www.irs.gov/app/pub-78/*) (Exhibit 8 at 09–2222—114–115).

[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]

108. As such, it appears that the Carib News Foundation's payment of travel expenses for Representative Kilpatrick and her acceptance of payment potentially violated the Internal Revenue Code.

109. The Board infers from the fact that the Standards Committee approved the reimbursement that the Standards Committee is unaware of this restriction. The Board notes, however, that its own research revealed that numerous other ethics-related entities in the federal government are aware of this restriction, and have for some time been enforcing it.[105]

110. Congressman Thompson told the OCE that he was unaware of any limitations on the ability of private foundations to pay for overseas travel by government officials.[106]

111. The Board notes that these facts show failures at multiple points by multiple parties in complying with and enforcing the travel rules. Inaccurate information was provided by the Carib News Foundation to Members and the Standards Committee. Congressman Thompson certified inaccurate information to the Standards Committee. The counsel to the former Chair of the Standards Committee intervened in the review process in a way that both frustrated the process in 2007 and set a pattern of obfuscation that continued in 2008. Finally, the Standards Committee appears unaware of limitations on the ability of private foundations to pay for overseas travel by Members.

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

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[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 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] Memorandum from Ethics Counsel at the National Institutes of Health to Deputy Ethics Counsels at NIH (Jun. 2, 2000) (Exhibit 25 at 09–2222—278).

[106] Memorandum of Interview of Representative Bennie Thompson (May 6, 2009) (Exhibit 2 at 09–2222—27).

EXHIBIT 1

RECORDS RESOURCE CENTER
2008 DEC -5 PM 4:02
OFFICE OF THE CLERK
U.S. HOUSE OF REPRESENTATIVES

☑ *Original* ☐ *Amendment*

U.S. House of Representatives
110th Congress

MEMBER / OFFICER POST-TRAVEL DISCLOSURE FORM

This form is for disclosing the receipt of travel expenses from a private source for meetings, speaking engagements, fact-finding trips or similar events in connection with official duties. You need not disclose government-funded or political travel on this form, or travel that is unrelated to official duties. This form does not eliminate the need to report all privately-funded travel on the Member or officer's annual Financial Disclosure Statement. In accordance with clause 5 of House Rule 25, complete this form and file it with the Clerk of the House of Representatives, B-106 Cannon House Office Building, within **15 days** after travel is completed. The Clerk is to make these forms available to the public as soon as possible after they are received.

1. Name of Traveler: Congressman Bennie G. Thompson
2. a. Name of Accompanying Family Member (if any): Dr. London Thompson
   b. Relationship to Member/Officer: ☑ Spouse ☐ Child ☐ Other (specify): _____
3. a. Date of Departure and Date of Return: November 6, 2008 to November 9, 2008
   b. Dates at personal expense (if any): NONE
4. Itinerary (cities of departure – destination – return): Jackson, MS to St. Maarten, N.A. to Jackson, MS
5. Sponsor(s) (who paid for the trip): Carib News Foundation
6. Describe meetings and events attended (attach additional pages if necessary): Attended Meetins to give a perspective on Committee Chairmanship and Legislation
7. Attached to this form are EACH of the following (*signify that each item is attached by checking the corresponding box*):
   a. ☑ the Private Sponsor Travel Certification Form completed by trip sponsor, including all attachments;
   b. ☑ the Traveler Form completed by the Member or officer; ***and***
   c. ☑ the Committee on Standards' letter approving my participation on this trip.
8. a. I represent that I participated in each of the activities reflected in the sponsor's agenda. (*Signify that statement is true by checking box*): ☑
   b. If not, explain: _____

9. **TRIP EXPENSES:** *Obtain actual dollar amounts from the sponsor. If exact dollar amounts are unavailable by the due date, provide a good faith estimate and file an amended form once the correct amounts are received.*

	Total Transportation Expenses	Total Lodging Expenses	Total Meal Expenses
For Member or Officer:	410.00	405.00	part of general program
For accompanying family member:	410.00	n/a	part of general program

	Other Expenses (dollar amount)	Specific Nature of Expenses (e.g., taxi, parking, registration fee, etc.)
For Member or Officer:	175.00	Registration Fees and Ground Transportation
For accompanying family member:	n/a	n/a

I certify that the information contained in this form is true, complete, and correct to the best of my knowledge. I have determined that all of the expenses listed above were necessary and that the travel was in connection with my duties as a Member or Officer of the U.S. House of Representatives and would not create the appearance that I am using public office for private gain.

SIGNATURE OF MEMBER: Bennie J. Thompson DATE: November 26, 2008

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

U.S. House of Representatives

COMMITTEE ON STANDARDS OF
OFFICIAL CONDUCT
Washington, DC 20515

October 20, 2008

The Honorable Bennie G. Thompson
U.S. House of Representatives
2432 Rayburn House Office Building
Washington, DC 20515

Dear Colleague:

Pursuant to House Rule 25, clause 5(d)(2), the Committee on Standards of Official Conduct hereby approves your proposed trip for you and your spouse 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 by your or your spouse from a foreign government must, within 60 days of acceptance, be disclosed on a Form for Disclosing Gifts from Foreign Governments and either turned over to the Clerk of the House, or, with the written approval of the Committee, retained for official use.

However, we would note that since this trip is scheduled to commence after the general election on November 4, 2008 and because officially-connected travel must be related to official duties, it may be questionable whether a Member who was not reelected in the general election should to accept an invitation for a trip that is fact-finding in nature. Arguably, as of that time, the official responsibilities that may justify the acceptance of travel expenses for such a purpose will have come to an end. This consideration generally will not limit the Committee's authority to approve travel of a departing Member to participate substantially in an officially-related event (for example, to give a speech). Please keep this guidance in mind, as you may need to reevaluate your ability to participate in the trip following the election.

If you have any further questions, please contact the Committee's Office of Advice and Education at extension 5-7103.

Sincerely,

Gene Green
Acting Chairman

Doc Hastings
Ranking Republican Member

GG/DH:pgp

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

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

This form should be completed by House Members, officers, or employees seeking Committee approval of privately-sponsored travel or reimbursement for travel under House Rule 25, clause 5. The completed form should be submitted directly to the Committee by each invited House Member, officer, or employee, together with the completed and signed Private Sponsor Travel Certification Form and any attachments. A copy of this form, minus this initial page, will be made available for public inspection. *Please type form.* ***Form (and any attachments) may be faxed to the Committee at (202) 225-7392.***

YOUR COMPLETED REQUEST MUST BE SUBMITTED TO THE COMMITTEE NO LESS THAN 14 DAYS BEFORE YOUR PROPOSED DEPARTURE DATE. Absent exceptional circumstances, permission will not be granted for requests received less than 14 days before the trip commences.

Name of Traveler: Congressman Bennie G. Thompson

I certify that the information contained on both pages of this form is true, complete, and correct to the best of my knowledge.

Signature: Jennifer Jimerson

Name of Signatory (if other than traveler): Jennifer Jimerson

For staff, name of employing Member/Committee: _____

Office address: _____

Phone number: _____

Email address of contact person: _____

☐ Check this box if the sponsoring entity is a media outlet and the traveler is a Member traveling to make a media appearance sponsored by that entity and these forms are being submitted to the Committee less than 14 days before the trip departure date.

NOTE: You must complete the contact information fields above, as Committee staff may need to contact you if additional information is required.

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

Committee on Standards of Official Conduct
U.S. House of Representatives
HT-2, The Capitol
Washington, DC 20515
(202) 225-7103 (phone)
(202) 225-7392 (fax)

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

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

PRIVATELY SPONSORED TRAVEL: TRAVELER FORM

1. Name of Traveler: Congressman Bennie G. Thompson

2. Sponsor(s) (who will be paying for the trip): Carib News Foundation

3. Travel destination(s): St. Maarten, N.A.

4. a. Date of Departure and Date of Return: 11/06/08 and 11/09/08

   b. Will you be extending the trip at your personal expense? ☐ Yes ☑ No

   If yes, dates at personal expense: _____

5. a. Will you be accompanied by a family member at the sponsor's expense? ☑ Yes ☐ No

   b. If yes, name of accompanying family member: Dr. London Thompson

   c. Relationship to traveler: ☑ Spouse ☐ Child ☐ Other (specify): _____

6. a. Did the trip sponsor answer "yes" to Question 9(c) on the Trip Sponsor form (*i.e.*, the travel is being sponsored by an entity that employs a lobbyist)? ☐ Yes ☑ No

   b. If yes, check one of the following: ☐ N/A – Sponsor checked 9(a) or 9(b)

   (1) Approval for one-night's lodging and meals is being requested: ☐ or

   (2) Approval for two-nights' lodging and meals is being requested: ☐

   If "(2)" is checked, explain why the second night is warranted: _____

7. Private Sponsor Travel Certification Form is attached, including agenda, invitee list, and any other attachments (*indicate that form is attached by checking box*): ☑

8. Explain why participation in the trip is connected to <u>your</u> individual official or representational duties:
   To give his perspective on committee chairmanship and legislation.

9. **FOR STAFF:**
   TO BE COMPLETED BY YOUR EMPLOYING MEMBER:

   I hereby authorize the individual named above, an employee of the U.S. House of Representatives who works under my direct supervision, to accept expenses for the trip described in this request. I have determined that the above-described travel is in connection with my employee's official duties and that acceptance of these expenses will not create the appearance that the employee is using public office for private gain.

   Date: 10/16/08 _____
   Signature of Employing Member

NOTE: This page must be submitted with your post-travel disclosure form within 15 days of your return, so you should maintain a photocopy of the completed form for your records.

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

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM
(provide directly to each House invitee)

This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers or employees under House Rule XXV, clause 5. A completed copy of the form (and any attachments) should be provided to each invited House Member, officer or employee, who will then forward it to the Committee. The trip sponsor should NOT submit the form directly to the Committee.

Private sponsors are urged to submit this form to each House invitee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the invitee not receiving approval for the trip. The submission of an incomplete form will delay the review process. Before completing this form, sponsors are urged to *carefully review* the Committee's private travel guidelines and advisory memoranda detailing the rules and restrictions for private travel, as well as the instructions for completing this form. Sponsors should call the Committee with any questions prior to submitting the form. *Please type form.*

1. Sponsor(s) (who will be paying for the trip): CARIB NEWS FOUNDATION

2. I represent that the trip will not be financed (in whole or in part) by a federally-registered lobbyist or a registered foreign agent (*signify "yes" by checking box*): ☑

3. I represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip (*signify "yes" by checking box*): ☑

4. Is travel being offered to an accompanying family member of the House invitee(s)? ☑ Yes ☐ No

5. Provide names and titles of ALL House invitees; for each invitee, provide explanation of why the individual was invited (include additional pages if necessary): BASED ON COMMITTEE OR SUB-COMMITTEE WHICH IMPACTS US/CARIBBEAN RELATIONS ON WHICH THE MEMBER SERVES.

6. Dates of travel: NOVEMBER 6-9, 2008

7. Cities of departure – destination – return: VARIES - DEPENDING ON MEMBER

8. Attached is a detailed agenda of the activities taking place during the travel (*i.e.*, an hourly description of planned activities) (*signify "yes" by checking box*): ☑

9. I represent that (*check one of the following*):
   a. The sponsor of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965: ☐ or
   b. The sponsor of the trip does not retain or employ a federally registered lobbyist or registered foreign agent: ☑ or
   c. The trip is for attendance at a one-day event *and* lobbyist involvement in planning, organizing, requesting, or arranging the trip was *de minimis* under the Committee's travel regulations. ☐

10. If travel is for participation in a one-day event (*i.e.*, if you checked Question 9(c)), check one of the following:
    a. One-night's lodging and meals are being offered: ☐ or
    b. Two-nights' lodging and meals are being offered: ☐
    If "b" is checked, explain why the second night is warranted: _____

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11. If the trip is not sponsored by an institution of higher education, I represent that a federally-registered lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip (*signify "yes" by checking box*): ☑

12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip:
CARIB NEWS FOUNDATION (* SEE ATTACHED)

13. Describe each sponsor's organizational interest in the purpose of the trip:
THE INTEREST OF CARIB NEWS 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 aircraft, please indicate if travel is being offered on a commercial flight, chartered flight or on an aircraft operated or paid for by a carrier not licensed by the Federal Aviation Administration to operate for compensation or hire (*i.e.*, a private aircraft). If first-class fare is being provided, or if travel is via chartered or private aircraft, please provide an explanation describing why such travel is warranted:
REGULAR SCHEDLED AIR SERVICE, ECONOMY CLASS

15. I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s). (*signify "yes" by checking box*): ☑

16. I represent that either (*check one of the following*):
a. The trip involves an event that is arranged or organized *without regard* to congressional participation and that meals provided to congressional participants are similar to those provided to or purchased by other event attendees: ☑ or
b. The trip involves events that are arranged or organized *specifically with regard* to congressional participation: ☐
If "b" is checked, detail the cost per day of meals (approximate cost may be provided):

17. Reason for selecting the location of the event or trip: SEE ATTACHED

18. Name of hotel or other lodging facility: SONESTA MAHO BEACH RESORT

19. Cost per night of hotel or other lodging facility (approximate cost may be provided): $110.00

20. Reason(s) for selecting hotel or other lodging facility: HAS APPROPRIATE MEETING ROOMS

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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** **Local transportation**
For each accompanying family member		

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

23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: [signature]

Name and title: KARL B. RODNEY, CEO

Organization: CARIB NEWS FOUNDTION

Address: 7 WEST 36th STREET, 8th FLOOR, NEW YORK, NY 10018

Telephone number: (212) 944-[redacted]

Fax number: (212) 944-2089

Email Address: [redacted]@ATT.NET

The Committee staff may contact the above individual above if additional information is required.

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

Committee on Standards of Official Conduct
U.S. House of Representatives
HT-2, The Capitol
Washington, DC 20515
(202) 225-7103 (phone)
(202) 225-7392 (general fax)
(202) 226-7172 (fax for travel approvals)

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

004/019 CARIB NEWS 10/15/2008 00:43 FAX

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

10/18/2008 00:49 FAX CARIB NEWS 005/019

Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10017
Tel: (212) 944-[redacted] Fax: (212) 944-2089
E-mail: [redacted]@caribnewsconference.com

Item #12

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

The participants are selected to participate in the various workshops during the Conference based on their demonstrated interest, expertise and assignment in the United States Congress.

Item#17

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

10/16/2008 00:49 FAX CARIB NEWS 006/019

Working Copy

13th Annual Caribbean Multi-National
Business Conference Program
St.Maarten, N.A.

THEME: *A REGION IN TRANSITION – STRATEGY FOR CHANGE – BUILDING ALLIANCES*

Thursday, November 6, 2008

12:00 noon– 6:00pm :	*CONFERENCE REGISTRATION* -

5:00 – 6:30 - *TOWN HALL FORUM - HEALTH*

Healthy Eating and Living

Innovative Solutions for Life styles
Diseases- a Collaborative Approach – Diabetes, Hypertension, Obesity, Oral Health

Venue - ROYAL ISLANDER
Moderator - Dr. Marcia Bayne Smith

Speakers - Mrs. Karen Boykin-Towns
Congressmember Dr. Donna Christian Christensen
Commissioner Maria Buncamper Molanus, Health Commissioner, St. Maarten
Dr. Leon Merrick
Dr. Jay Cohan
Dr. John Palmer

6:30- 7:30pm - *OPENING RECEPTION*

Venue: - UPPER POOL

Theme: - *A REGION IN TRANSITION -*

Speakers: - Faye A. Rodney

Hon. Roy Marlin – Commissioner for Tourism & Finance – St Maarten.

MC: - Sabrina Hosang - Royal Caribbean Bakery

7:30 – 9:30 pm - OPENING DINNER

Venue: - MAHO ROOM

Theme: - *STRATEGY FOR CHANGE*

MC - Judge Sylvia Hinds-Radix

Speakers : - Susan Taylor

Hon. Donald Payne, Member US Congress

10:00pm – 1:00am: - HOSPITALITY AREA

Friday, November 7, 2008

8:00am – 8:45am - (BREAKFAST) – OCEAN TERRACE

9:00am – 6:00pm *CONFERENCE REGISTRATION*
OCEAN TERRACE LOBBY

CONFERENCE SECRETARIAT
SABA ROOM

9:00am – 10:15am	-	OPENING CEREMONIES
Venue:	-	MAHO ROOM
Theme:	-	*BUILDING ALLIANCES FOR PROGRESS*
Invocation:	-	Rev. Susan Johnson=Cook
Anthems:	-	St. Maarten
		Lift Every Voice
Remarks:	-	Eric Eve
		Karen Boykin-Towns
		Marie Long
		Ed Goldberg
		Patrick Gaston
		Hazel Dukes
Speakers:	-	Hon. Carolyn Cheeks Kilpatrick – Member US Congress
		Commissioner Sarah Wescot-Williams, Leader of Government, St.Maarten
		Harry Belafonte

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

TRAVEL AND TOURISM -

A Transformative Approach

Moderator - Lloyd Williams

Greetings - Wallace Ford

Speakers - Commissioner Roy Marlin

Howard Dodson

Congressman Gregory Meeks

Professor Rex Nettleford

Dr. Martin Valdes

12:00 noon – 1:15p.m - PRESENTATION

HEALTH – AN ECONOMIC DEVELOPMENT STRATEGY FOR THE REGION

Greetings	-	Karen Boykin-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*
Venue	-	Royal Islander A
MC	–	Dr. Patricia Hazlewood
Speakers	-	Patrick Gaston
		Albert Browne

Round Table #2 –

Theme - *LOCAL BUSINESS INITIATIVES*

Opportunities with US Companies

Venue - Royal Islander B

Speakers : - Ed Goldberg

Eric Eve

Albert Browne

4:30pm – 6:00pm - *TOWN HALL FORUM - EDUCATION*

Venue - Royal Islander A

Theme : *EDUCATION – SHARING WORKING SOLUTIONS*

Greetings : Michael Flanigan

Moderator : Dr. Marcella Maxwell

Speakers: - Hon. David M. Dinkins – Former Mayor, NYC

Dr. Edison O. Jackson

Dr. Marcia Keizs

Professor Rex Nettleford, UWI

William Payne, Assemblyman New Jersey

Venue:

6.30:00pm – 7:30pm - *HOST COUNTRY EVENING*

Venue: -

Theme -

MC:

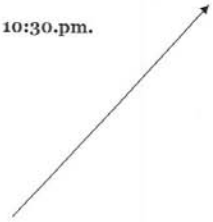
Speakers: **CULTURAL PRESENTATION**

7:30 – 8:00 pm:

8:00pm – 10:30.pm.

Venue :

Theme



10:00pm – 1:00am - *HOSPITALITY AREA*

Venue:

Saturday, November 8, 2008

7:45 am – 8:15 am	=	BREAKFAST
Venue	-	*OCEAN TERRACE*
8:30am – 10:00am	-	*PRESENTATION*
Theme		*WOMEN OF INFLUENCE AND POWER*
Venue:	-	*MAHO BEACH*
Greetings & Opening Remarks -	-	Brenda Scott
Moderator	-	Marilyn Johnson
Speakers:	-	Commissioner Sarah Wescot-Williams, Leader of Government Business
		Dame Billie Miller, former Deputy Prime Minister,

		of Barbados
		Dr. Marcia 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*
Venue	-	Royal Islander A
Greetings	-	Wallace Ford
Moderator	-	Dame Billie Miller
Speakers	-	Hon. P. J. Patterson, former Prime Minister, Jamaica
		Hon. Dr. Ralph Gonsalves, Prime Minister St. Vincent and the Grenadines
	-	Hon. Dr. Denzil Douglas, Prime Minister, St. Kitts-Nevis
		Congressman Charles Rangel
12:00 noon – 1:30 p.m.		*PRIVATE MEETING – CLOSED DOOR SESSION* with Members of Congress and Ministers of Government
12:00 noon – 1:15p.m.		PRESENTATION
Theme	-	*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 Caribbean Development Bank
	-	Congressman Edolphus Towns
	-	Eric Eve
12:00 noon – 1:15pm	-	*PRESENTATION*
Theme		*Hemispheric Security – Ports/Airports – Crime – Drugs – Disaster*
Venue	-	Royal Islander B
Greetings	-	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
Theme:		*CARIBBEAN – A SOLID INVESTMENT*
Greetings	-	Hon. Darryl Towns
Speakers	-	Hon. William Thompson, NYC Comptroller
		Dr. Compton Bourne, President CDB
Round Table #1	-	*IMMIGRATION/DEPORTEES*
Venue	-	Royal Islander A

Moderator	-	**Dr. Marco Mason**
Speakers		**Congressman Bennie Thompson**
		Hon. Eddie Bernice Johnson, Member US Congress
		Attorney Stanford Rubenstein
		NYC Councilmember Dr. Kendall Stewart
Round Table#2:	-	**HAITI – BOLD INITIATIVES – THE DIASPORA-**
		CBC AND CARICOM
Venue	-	**Royal Islander B**
Moderator	-	**Hon. Yvonne Graham**
Speakers	-	**Hon. Charles Rangel**
		Hon. Gregory Meeks
		Hon. Ralph Gonsalves
		Dr. Lesly Kernisant
4:30 pm – 6:00pm	-	*TOWN HALL FORUM - TECHNOLOGY*
Venue:		Royal Islander A
Greetings & Opening	-	Marie Long
Moderator	-	Colin Ward
Speakers	-	Congressman Edolphus Towns
		Albert Brown
		Commissioner of Technology
6:30 – 7.30pm	-	GALA RECEPTION

Speakers	-	**Susan Taylor**
7.30pm – 10:00pm	-	***GALA DINNER & AWARDS PRESENTATION***
Speaker	-	**Dr. Harry Belafonte**
		Hon. Sarah Wescot-Williams, Leader of Government Business
		AWARDS PRESENTATION
		ENTERTAINMENT
10:30pm – 1:00am	-	***HOSPITALITY AREA***
Venue:		**HOTEL CONFERENCE ROOM**

<u>Sunday, November 9, 2008</u>

8:30 am – 10:00am	-	***POWER BREAKFAST***
Theme:	-	***SPIRITUALITY - THE BASICS IN BUSINESS***
Greetings	-	***Lowell Hawthorne***
Speakers	-	**Ed Goldberg**
Selection:	-	**Local Choir**

EXHIBIT 2

CONFIDENTIAL

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

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re:	Representative Thompson
Review #:	09-2222; 09-2567; 09-4403; 09-3698; 09-6333
Date:	May 6, 2009
Location:	2432 Rayburn HOB, Washington, D.C.
Participants:	Leo Wise
	Beth Horton

Summary: Representative Thompson attended the 13th Annual Caribbean Multinational Business Conference. We requested an interview with Representative Thompson and he consented. Representative Thompson was given an 18 U.S.C. § 1001 warning and he signed a written acknowledgement of the warning. Representative Thompson made the following statements in response to our questioning:

1. He attended the 13th Annual Caribbean Multinational Business Conference in 2008.
2. He stayed at the conference for 3 days.
3. He recalled that he stayed in a standard room and that meals were provided at the conference.
4. He was invited by the Rodneys.
5. He stated that the Rodneys were newspaper people from NY. He knew of them through an affiliation with the Carib News community. The newspaper provides information about the Caribbean to people in NY.
6. The Caribbean relates to his duties because there are significant issues regarding homeland security, human trafficking and drug issues.

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

7. Carib News paid for his travel (whoever is listed on the form).
8. He made the decision to attend the conference.
9. He has never been to any fundraiser for the Foundation.
10. Jennifer, his scheduler, handled his travel.
11. Once he decides that he is interested in a trip, Jennifer handles all the arrangements and works with the entity to work out the travel plans.
12. He chooses flights based on what is going on in Congress.
13. Jennifer generally provides him with a printout of available flights and he then chooses what will work with his schedule.
14. He departed from Jackson, MS and arrived at the beginning of the conference on the 6th of November.
15. He does not recall the dinner but he would have attended the activities at the conference.
16. He recalled that Rep. Payne attended the conference and he noted that if he was there, he would have spoken at the conference at some point, but he did not recall his speech. He stated that the time he spoke would be reflected on the program.
17. He did not recall the first session of the conference but he would have attended.
18. He recalled that Representative Kilpatrick spoke at the conference but he did not know when nor did he recall what she said.
19. He did not recall the ribbon cutting and did not see himself in the picture of the ribbon cutting.
20. He attended a workshop regarding doing business in the U.S.
21. He also participated in a second session that dealt with homeland security issues.
22. Generally, other government officials were at the session.
23. He did not see a letter regarding the session.
24. The signature on the post travel document is his.
25. Members of his staff can also sign documents for him.

26. The travel form was put together between Marsha and Jennifer.

27. The entity that sponsors the travel would provide the breakdown of expenses. He assumed that is what happened in this instance.

28. He believed the information on the form to be accurate. He had no reason to disagree with the figures provided by the sponsor. Beyond meals, travel, and lodging there were no other expenses.

29. He did not see any bill that would dispute the sponsor's charges.

30. He did not recall any sponsors, he remembered seeing people from companies but didn't recognize them as sponsors.

31. He did not recall Rep. Payne thanking any companies as sponsors.

32. He did not recall Rep. Kilpatrick thanking sponsors.

33. He had no personal knowledge of any of the representatives, the '08 conference was one of the few conferences that he has attended where he didn't know anyone prior to the conference.

34. He stated that the Foundation paid for his travel.

35. He was not aware if the government of St. Maarten paid for any expenses.

36. He was not aware of any limitations on private foundation's ability to pay for travel expenses.

37. His practice is to submit a travel request to the Standards Committee and if the request is approved then he would not assume there were any other issues.

38. He has not had any contact with the Standards Committee regarding any travel issues.

39. His understanding of Carib News is that it has a business interest in the Caribbean.

40. He is not aware if the Carib News gave money to support the conference.

41. He has not spoken with anyone about the conference.

42. He is not aware of who the host of conference was, he did not see anything pertaining to the host.

43. He was sure that someone from the government of St. Maarten was present but does not know any names.

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

44. He was not aware that the government played a role at the conference.

45. There were various government officials from the islands at the conference.

46. He is generally familiar with the House travel rules.

47. He does not recall any specific briefing on travel. He relies on his request to the Standards Committee. If the Standards Committee raised any issue with regard to travel, he would not take the trip. He makes the decision to travel after receiving a letter from Standards.

48. He may have attended the '07 conference, he could not recall for sure.

49. He did not recall any ethics related issue regarding the '07 conference.

Beth Horton
Investigative Counsel

EXHIBIT 3

TRANSCRIPT OF AUDIO FILE:

11-7 AM SESSION - FIRST 30 MIN

Thank you for working with Accentance for your transcription needs. The text below represents a professional transcriptionist's understanding of the words spoken. No guarantee of complete accuracy is expressed or implied, particularly regarding spellings of names and other unfamiliar or hard-to-hear words and phrases. "(ph)" or "(sp?)" indicate phonetics or best guesses. To verify important quotes, we recommend listening to the corresponding audio. Timestamps throughout the transcript facilitate locating the desired quote, using software such as Windows Media or QuickTime players.

BEGIN TRANSCRIPT:

KARL RODNEY: ...Mike Flanigan how through the year his division has been supportive of the Mission and the Conference. And so we want to say thanks to Citi. You'll be hearing from Mike later but it's a great team to have working and great partners. We have Pfizer and a big supporter of (inaudible) aspect. Karen Boykin-Towns is not here, she has been able to in the past eight years and there's a death in her family and so she's not here to begin. Through the years work had done in the Caribbean circle in the United States and then a special touch to our work that can be done not only on the delivery of health care but overall awareness. [0:01:00.4]

And over from Macy's and its very fine team has been innovative in outreach to various locations we've gone to, finding new vendors, developing new contacts and really helping to make the conference a success by engagement of our local participants. So Ed and Brenda are tremendous supporters and we're so delighted that they're here with us.

IBM and Marilyn Johnson, Marilyn is Vice-President of Market Development, responsible for strategic marketing for Black, Asian and Hispanic, Native American and Women. Marilyn's a dynamic partner and you'll be hearing from Marilyn also. You should be alerted that between Brenda and Marilyn tomorrow is Women's sessions is going to be something to talk about. [0:02:09.5]

Marie Long is here from ATT but ATT has supported the Conference all 13 years. We started with them. They made sure that the Vision, the Mission of the Conference is supported through the many years.

We have with us Mr. Pat Gaston. Mr. Gaston is the President of Verizon Foundation, one of the largest private foundations in the United States. And Mr. Gaston has made his mark in moving that foundation to be a force in education in the United States. We are delighted he is here to be with us and to introduce a wonderful program that has been very effective in the United States (inaudible) to see if there is potential here in the Caribbean. So, Patrick, we are delighted you are here and we look forward to your presentation. [0:03:14.9]

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.

It was also here in St. Maarten's that the issue of tax exemption for conferences held in the Caribbean was again brought to the attention of the members of the Congressional Black Caucus and again that was achieved within a year. [0:08:08.2]

And so we've seen that kind of work constantly throw it's really the conference. So we can try to serve real achievement in fact in this room there is a couple that came from Denver to Barbados for their first Conference and they have built a region wide distribution for ice cream and fast food. And this has grown considerably.

It was also through the Conference that a small technology company with the value of $2 million came, got a contract and that company in two years became a $12 million company. And we've seen that kind of connection throughout the Conference. We could point to Barbados where technology was enhanced with respect to ATT work with the local Barbadian telecommunication company. St. Croix the fiber optics center, Grenada an oil refinery, all coming up with the expertise of the Conference to the (inaudible). [0:09:30.7]

And so the Mission is there to continue, the Mission is there to enhance, the Mission is there for us to make it work particularly now when we see the change has come and we can now come together to pad the agenda and to look forward to this kind of strategy for change. And so we want to welcome you. We promise that our sessions are going to be interesting. We have some of the best speakers that you can find on the various topics. We're going to see more when we get together the support we can bring to each other. The support we can provide with respect to the met work and certainly when we go back in the Caribbean we can really see results. We can come together as a people. You've been a great Conference. Thanks so much for being here. God bless. [0:10:28.4]

REV. DR. SUZAN JOHNSON-COOK: Thank you Mr. Rodney and we also thank you Mrs. Rodney as well. With interest we're here on the wave of the man who campaigned about change and on this transition to change and also strategic alliances. And we hope that will happen for you while you're here. Mr. Vide mentioned all of the sponsors who were with us and the partners who helped to make this happen and we're going to hear from three of them at this time at this quarter, Michael Flanigan from Citibank (Citi) and Ed Goldberg, Senior Vice-President at Macy's and Community for the Relations, and Patrick Gaston the President of the Verizon Foundation. In that order we will receive them this morning as they come, please. (clapping) [0:11:15.6]

MICHAEL FLANIGAN: Good morning.

ALL: Good morning.

MICHAEL FLANIGAN: It's really a pleasure to be here. As you heard before, Eric is on his way so I have the great privilege and honor of putting in for Eric. But first just wanted to say "thank you" and again welcome to the 13th Annual Caribbean Business Conference. This year was significant for Citi. For the first time we are the lead sponsor of this premier event. But I would be remiss in not thanking the organizers and our hosts here at St. Maarten so to the

government, to the Commissioner Sarah Westcott-Williams, Governor Franklin Richards and Commissioner Roy Marlin and all the other elected officials here in St. Maarten and elected Congress members, appointed officials from the United States it's a pleasure to be here with you. [0:12:15.6]

We also of course have to thank the Rodney's as being 13 years in ensuring that this vision is carried out and delivered all across the Caribbean and I don't call to talk about some successes but I think one of the most important success that I think that I've experienced in coming to the Conference for the last six or seven years is just reunited with his great family. It's all about developing our communities. About we're all about the same thing, I think. We're all on the same page. We're all about the same agenda. And we're all about making sure that we absolutely care about each other, yourself but we care about the broader community. So it's always a pleasure to be here. I get re-energized every time I come. And so it's - I look forward to it - so it's one conference that I will never miss.

This Conference is an important gallery that makes a tangible contribution to dialog on the issues of important to communities. From recognizing the untapped wealth for underserved communities to building property alliances so that together we can build healthy, robust, organic economies. Today and tomorrow and even into Sunday are very important to that conversation at least to building a winning strategy to succeed in these turbulent economic times. I trust that we will all take full advantage of the great minds and the leaders that we are privileged to spend time with. I know my Citi bank black (inaudible) are ready. Thank you so much for having us here at Conference. (clapping) [0:13:58.2]

ED GOLDBERG: Good morning everyone.

ALL: Good morning.

ED GOLDBERG: As Mike said it's really a pleasure to be back with family today. We look forward to this Conference very year. Obviously, we hope that there will be many, many more over the years to come. I learned something from David Dinkins several years ago when you have a whole list of dignitaries in the house, the best thing to say is, "Present, protocol observed." So, Mr. Mayor, thank you for those kind words. (laughter)

Now a week and a half ago, Macy's celebrated its 150th anniversary. (clapping) When you think about anniversaries of companies today to believe that somebody could be around in the retail industry in particular for 150 years is quite an amazing feat. I'm sure that when R. H. Macy opened his store in lower Manhattan on 14th Street on October 28, 1858, he did not have the vision that the company some day; number one would last for 150 years; or that it would employ 225,000 people; or that they would do $27 billion a year in business; or for being in 46 of our 50 states; and also the opportunity of having a business in 64 or 65 major markets in the United States. [0:15:30.9]

But today I'm hear to talk more about the Caribbean contract. The fact that we have been supportive of Carolyn Fay and this particular venture for the number of years but more importantly the fact that we come here to look for that spark that will ignite an opportunity to

find that next Martha Stewart; that next design; or that new product that's going to sell in our stores such as we've done with the Rwandan peace baskets and products like that. And I think it is really why our Mission is so important, it's not just a question of change, not just a question of transition but it's building those ties and looking for those opportunities. That I think will bring us closer together. [0:16:15.9]

There's no question that we all face difficult times but I believe that the Caribbean is our backdoor and the bottom line in opening for us for expansion. No, I don't think we can build 250,000 sq. ft. mall stores but Macy's has to learn in transition how do we conduct business in the Caribbean communities. And I think we're going to find that way and obviously this particular convention is one of those opportunities to do so.

You all know Brenda Scott, my wife, (laughter), Judy's back in the room sleeping so I can say that. But Brenda and I have been together for more than 20 years. We have obviously been very much involved in our communities where we do business and we still believe we have a long way to go. But our mission is being supported by a great Chairman, Terry Lundgren, and the people of Macy's, so obviously we look forward to developing these bridges and developing the relationships. And I hope that in the not too distant future, we will be talking about a Macy's store here in the Caribbean. So enjoy your convention. I hope I'll get a chance to talk to each and every one of you as the time goes by over the next couple of days. And again, thank you so much, Carolyn Fay for the great work that you do. (clapping) [0:17:32.9]

PATRICK GASTON: Good morning everyone.

ALL: Good morning.

PATRICK GASTON: Thank you, Karl, for the wonderful introduction. Thank you, Michael and Ed for these great remarks. I extend welcome from our CEO, Ivan Seidenberg, and our 225,000 employees, many of whom are from the Caribbean mason including me. I want to acknowledge my colleagues and members of the public sector, members of the community, and I also, I guess, want to respect present protocol. Okay, but I have to single out a couple people, right? So thank you to the leader of government Sarah Westcott-Williams for hosting us today and the great people of St. Maarten. It's a delight to be back here. This is my eighth time in St. Maarten and I may stay. (laughter) It's wonderful. I want to acknowledge Karl Rodney for his exceptional ability to bring people together to recognize the collaborations that are important for business development. He does so with the grace that I admire and it's the first time I've had the chance to be here with you, Karl, and it's an honor to be here and a privilege so thank you for inviting me. [0:19:06.0]

I want you all to recognize Rex Nettleford, I don't know if he's in the audience still. But Rex and I have known each other for about nine years when I first joined the Foundation of the University of West Indies Board of Directors. And one of the things that attracted me to the University in addition to Karl, of course, was that Rex was the kind of leader that reflected a lot of commitment and enthusiasm about education; something that I care deeply about. And over the years has provided me with his counsel and friendship and I thank you for that, Rex. (clapping)

You know. Verizon does not have a retail presence in the Caribbean and I hope some day we will. But we do provide global Internet networks that help to provide a lot of communications that you might experience here. So I think we're in the game and we realize the value of technology to ensure that folks have access to incubation and education. In my case at the Verizon Foundation, Karl mentioned that I head up the Verizon Foundation and our emphasis is on education. And what we're trying to do is deliver resources to teachers in the classroom that need it really badly. So we're developing contact and we're taking with our partners, we're taking that contact and making it available through our technology platforms so during the course of today in the discussions that we'll have. we'll talk about that resource. Which, by the way, is offered free of charge to teachers around this country and now around the globe, so we want to make sure that we present this resource as another thing that this community can use and use it in a way that's free. So I'm looking forward to this dialogue and am excited about this Conference and I thank you very much, Karl, for inviting us to hear quality. [0:21:06.2] (clapping)

REV. DR. SUZAN JOHNSON-COOK: Thank you very much. I loved language in school. I remember ottomottopea and phizz and those words and oxymoron, best of times, worst of times, homonyms, the words that sounded alike with different meanings but synonyms when you said the word you could understand what it meant. It was synonymous with something. So when we say the words, "front line", "civic leader", "activist", "Miss NAACP", "world leader". "you don't want to mess with her", you know it is synonymous with Hazel Dukes and we want to hear from her, our God, mother, our community, don't you think I'm right? (clapping) Miss NAACP, Miss Leader, our dignitary, let us receive this morning, the Honorable Hazel Dukes of New York City. Are there any New Yorkers in the house? (clapping) Let's get a little noise over here. All right.

HAZEL DUKES: Good morning.

ALL: Good morning.

HAZEL DUKES: This is my 12th Conference. Missed only one because I had a broken ankle and it was just like four weeks before the Conference, not even, be on the cast. But let me say to Fay and Karl that they have been the glue without the (inaudible). They are for us 24-7. Not only just in New York City but the Islands we have attempted. The NAACP will be celebrating its 100th anniversary in New York City where it was founded July 14 through July 17. Medgar Evers, the college, the university, the (inaudible) of the city of New York, when George Blackburn and I sit and watch TV and we hear all people go over their history, people forgot that it would not have been possible if it was not for those names, Medgar names known or so many others in Alabama for Rosie, decided to sit. So Maude could stand. Maude could not have stood if Rosie hadn't of sat. Rosie was the Secretary of the NAACP, the National Association for the Advancement of Colored People. The Colored People come in all colors, when you make your beautiful salad you just don't want all greenery in it. Even with your omelet this morning you could have a mixture, of beautiful flowers I have to have all colors. And so for a hundred years this old ship resigned, been around. Lord, I was reminiscing last night Congresspersons who we went to the Congressional Black Caucus there was only six. We used to be at the Hilton Hotel. And we held court. When we started in Albany there was no black and Puerto Rican caucus, there was the

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 I'll promise will be here next year, 35-year-old Rhodes scholar. ingratiating young brother who is so excited where we are going. And my sisters in the Congressional Black Caucus and my brothers, we going to get it together. As our Congresswoman told us yesterday. "We're tired of talking about it. It's (audible) we are sick and tired of being the sick and tired." And so when we leave here, we will be better off because we came together to make new friendships, to re-energize and I would say to Karl and to Fay, our sincere gratitude to you for bringing us together as a family each year. Some of us even don't have enough time to sit. That's why Laura convinced me to come a day early. Even if I don't know what's happening with my 401K (laughter) I'm nervous, Mr. Comptroller man. I don't know about vacation but we thought it not right not to come here and be with our family. Thank you so much. [0:28:13.4] (clapping)

REV. DR. SUZAN JOHNSON-COOK: We thank you so, so much. He began his second term in January 2006 as the 42nd Comptroller of the City of New York. He's come from a distinguished parenthood, a famous judge and a mother as a public school teacher, but he has distinguished his own path. And he has become a wonderful Comptroller of New York City and he has responsibility for all the city's pension funds. He's just a good brother. He's here with us today, hope to be the next mayor of the city of New York. Let's put our hands together for William C. Thompson, Jr., the Comptroller of a great city of New York, New York. All right?

WILLIAM THOMPSON: Thank you Reverend for that very wonderful introduction and it's good to see you here as our Master, or Mistress of Ceremonies, this morning. And I go ahead and make a mistake. I should have had the Mayor open up for me because he always does it correctly. But to our leader of government, Commissioner Westcott-Williams, to the members of government here in St. Maarten, my colleagues in government all over the United States, friends, good morning.

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

TRANSCRIPT OF AUDIO FILE:

11-7AMSESSION - 30 THRU 75 MIN

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BEGIN TRANSCRIPT:

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

WILLIAM C. THOMPSON, JR.: - It's good to be back again and let me first start out by thanking, and I always term them as I did last year and I have continued to do it over a period of time, termed them the "dynamic duo," Faye and Karl Rodney. [applause at 0:30:16.7] They happen to be, when it comes to vision - and that's exactly 13 years ago when putting this conference together, they had a vision. It is something that they have never taken a step back from. They continue to move forward. they continue to bring us together. And while we have the opportunity to meet, to have conferences in some wonderful places, just fabulous environments and that is the truth, but they work us, okay. Karl and Faye let us understand that we may meet in a wonderful environment, you walk outside and it's gorgeous, but we are here to accomplish things. [0:30:58.7]

Karl mentioned when we were here before, and I remember the discussions with the members of the Congressional Black Caucus. and it wasn't just those who owned hotels, it was members of government who had indicated then that the (inaudible) $200 dollar duty-free or the amount that you could bring in the country hadn't changed in decades. in years and years and years. And I remember that members of the Congressional Caucus. the Congressional Black Caucus led by Congressman Charles Rangel. the Chairman. and now he wasn't the Chairman at that point. he went back to Washington and in a period of months the amount had doubled from $200 to $400 dollars. It was the right thing to do but you saw the power of this Congress. As I said, we might come together in wonderful places, but it is about business. It is about increasing the ties. It is about the business between the Caribbean and the United States and increasing those business opportunities, helping to raise the standard of living for many; helping to build businesses and institutions, that's what it is about. [0:32:09.5]

Last year, Karl had me down here and - no I'm sorry, last year after our conference I worked. I must admit, Karl had me as a luncheon speaker, we were outside, it was about 85 degrees and I was in a tie okay. I was in a suit and tie and it took me a couple of hours afterwards to dry out. But the one point that was made then was Karl looked at me, and those of you who know me in the

introduction as New York City's Controller, I'm a member, a trustee of four of our five pension boards, chief investment advisor to all five. Our total assets in knowing, it might have shrunk a little, but our total assets are about $95 billion dollars right now. We are the fifth largest public pension fund in America. [applause at 0:33:02.4] At that point Karl looked at me and said, by the way how much of that is invested in the Caribbean basin? How much of that money is going to create, to build infrastructure, to help with tourism, healthcare and other things? And it was an impressive question and I went back and the answer was not much. Not much, so we started to go at that point down the path of looking at investment possibilities in the Caribbean basin; obviously a very promising area. [0:33:42.0]

To go back to quote just a couple of numbers as we would look at - now it has been a tumultuous year on Wall Street, at the same point, many of the investments, as we were termed that we have made in the emerging markets around the world, have outperformed developed markets. For instance, one year, three year, five year performance of emerging market equities has been on par or better than the United States private equity, the United States venture capital, Western European private equity and U.S. public markets. Clearly it makes sense for institutional investors to begin to move further into those waters of emerging markets. [applause at 0:34:25.8]

So we went back and started to engage, particularly we looked at private equity, and the way we invest usually isn't directly it is in private equity funds, so we began and our private equity consultant, we asked them to take an initial look at the Caribbean basin for how much initially should we be investing. And the number that they came back with was $80 million dollars. That would be our first step into investment in the Caribbean basin through a variety of investment vehicles. We started to move down that path and unless I am wrong, and if I am I will be short a few people or I will loose a few people in my investment side, but I believe that yesterday back in the office, back in front of one of our pension boards, we approved the first application of $30 million dollars to be invested in the Caribbean basin. [applause at 0:35:25.8] And, we are going to continue to move forward through other investment vehicles to invest and commit, or really to commit and invest, the additional $50 million dollars and then we will take a step back and look for other possibilities. [0:35:46.8]

So I just wanted those to know that conversation, that investment of money, and as I pointed out it will range in everything from real estate to infrastructure, industries ranging from healthcare, financial services, energy, telecom, tourism and other areas, but that started last year at this conference. [applause at 0:36:09.8] So to those who say, "Jeeze you are going to St. Maarten? Have a wonderful time. I know you are going to spend a lot of time on the beach," Karl and Faye make sure that we are working hard and that we are getting things done. [0:36:28.6]

And at this conference, while it is great to see friends and colleagues and some people I don't get to see for a year, we are here working and we are here making sure that we increase and bring closer those ties that we have had in the past and that we are helping to grow business, that we are helping to improve quality of life both here in the Caribbean and back in the United States.

So again, it is a pleasure and let me say again to Karl and Faye, thank you so much for the leadership that you have shown. We look forward to your continued leadership for years to come. Thank you so much. [applause at 0:37:04.2]

REV. DR. SUZAN JOHNSON-COOK: Thank you for working hard while you are here and even back at home. Thank you. It is so good to be together. We do get to sit down and talk to each other here. We try to get on each other's calendars in the City and we never do, but here we are able to make and transact business and it's wonderful.

As a point of personal privilege, it is not everyday that you have a city world leader that you know very well is a man of faith first of all, who reads the Holy Scripture at your wedding. It's not everyday that you go into (inaudible) flavor at a press conference that he has called and then he comes to the hospital to see the birth of your first child. It's not everyday that you have someone who is there at the blessing of that child who's named after him. It's not everyday that you have someone who hosts Whitehouse Fellows when the run, coming to New York City and gives them the key to New York. And, it's not everyday that we have the first African American Mayor of the City of New York in our midst. We are in the midst of history here. He was the 106th Mayor for the City, but he is our number one Mayor, the Honorable Mayor David Dinkins, Professor in the Practice of Public Affairs at Columbia University [applause at 0:38:16.8], and our wonderful, wonderful leader who's shoulders we stand on and for who we cheer for in honor this day. Let's hear it for the Honorable David Dinkins. [0:38:28.4]

DAVID DINKINS: Well one thing is clear, if I had had the good fortune of having the Reverend introduce me more often I might have gotten re-elected. [laughter at 0:38:48.4] I am delighted to be here, but I want to clear one thing up from the start. I think it should be acknowledged that Faye Rodney has been such a wonderful person and to think that she permits her husband to come along with her the way he does [laughter at 0:39:10.1]. It's really nice. She even lets him think he's in charge every now and then. [laughter at 0:39:16.6] But they are a dynamic duo.

I am delighted to be here with you, I truly am and each year, I guess I've been here ten out of - at least ten times I think - and each year I try to get myself on the committee that will go and do the, make the decisions on where we are going to go next year so I can visit the islands but they have not yet let me come. But each year though, I insist that the tennis facilities be adequate, but I am not playing this time. But I want you to know my friends (inaudible) that they were out on the court this morning and I will get a report and it better be good. [laughter at 0:40:14.3]

I am delighted to be here with you, I truly am and we are taking a role and those folks who are not here now, but are still having breakfast or are out on the beach, we've got their names; [laughter at 0:40:33.0] and we are going to chastise them severely. But it really is a wonderful, wonderful opportunity to come together with friends. For me personally it gives me an opportunity to say thank you to so many of you who helped me become the 106th Mayor of New York. [0:40:51.2]

We say often that everybody stands on somebody's shoulders, and by that we mean Malcolm X and Martin Luther King and (inaudible) and Harriett Tubman and Rosa Parks and for me, for me personally, it also means Percy Ellis Sutton, [applause at 0:41:13.0] who ran in 1977 with such class and distinction that nobody laughed at me when I dared try in 1989. And we were successful and it is a broad leap. [0:41:33.6]

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

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]

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 eyes on the first black governor. So imagine, as I sat in the front row at the state committee meeting and Basil placed David's name in nomination for Lieutenant Governor. I had tears in my eyes. It had come full circle and now that same David is Governor of the State of New York and you will hear from him later. [applause at 1:06:41.3]

Later this afternoon we will meet to share our thoughts and plans for sharing working solutions to education. There are challenges is business and political leaders will be to craft strategies for keeping the doors of the international education open to our future leaders. The world will be a

dimmer place if we let the lamp of knowledge go out for a generation of our young people. It is within our power to turn up the flame and keep it burning bright, and in the words of President-elect Barack Obama, "Yes we can." [applause at 1:07:24.8]

REV. DR. SUZAN JOHNSON-COOK: Thank you Mr. Mayor, and thank you for looking so wonderful. He's dapper, Amen! Doesn't he look good? [laughter and applause at 1:07:42.4] And Barack Obama stands on your shoulders because you took the blows that shows what a man of faith could do and we thank you for representing us well. [1:07:52.3]

We also are joined by many a (inaudible) joints throughout this conference by many elected officials and some are here this morning; elected officials from the State of New York. You will hear later from the Honorable David Paterson, you heard from our City Controller Honorable William C. Thompson, Jr., Honorable Adolfo Carrion, Jr., President of the Borough of the Bronx; Honorable Nick Perry the Assemblyman for New York State, The Honorable Ruth Hassle-Thompson, State Senator New York State, the Honorable Keith Wright is with us this morning, Assemblyman for the New York State the Honorable Inez Dickens, Council Whip, Member of the New York City Council, and Honorable Dr. Kendall Stewart, Member of the New York City Council. Can we applaud for all of the elected officials from the State of New York? [applause at 1:08:34.3]

And then members of Congress who will be joining us throughout, some of whom you heard last night and today, the Honorable Donald Payne, the Chair of the Subcommittee on Western Hemisphere, the Honorable Bennie Thompson, Chair of Homeland Security, Honorable Donna Christensen, the Honorable Chair of the Subcommittee on National Resources, Honorable Sheila Jackson Lee and now we are also going to hear from one of our Presidents of the Congressional Black Caucus, the Honorable Carolyn Cheeks-Kilpatrick. We are going to the federal level y'all [applause at 1:09:09.6] who is our President, Madam President and will be working with Mr. President would you please come and let us receive her this morning for what a wonderful job you have done and you have served with distinction as well and we celebrate and salute you this morning. Can we applaud the other members of the Congress who are with us? [applause at 1:09:29.1]

REP. CAROLYN CHEEKS-KILPATRICK: Giving honor to God who is the head of my life, present protocol being established [laughter at 1:09:46.3], but I've got to say a couple even given that. To Faye and Karl, its really thoroughly been said but thank you from the bottom of all of our hearts. We could not do this without you. Thank you very, very much. [applause 1:10:00.4] We could (inaudible) every week in our Washington offices, but that's how we keep up with the Caribbean if not for the newspaper, there would be no association that we could actually see and know what is going on and how we (inaudible) so thank you very much from the bottom of our heart. Thank you very much. [applause at 1:10:18.6] Commissioner Wescot-Williams as well as all the commissioners over here. St. Maarten, one more time, thank you for hosting us one more time, we love you, thank you very much. [1:10:29.4]

Our key ingredients for the Congressional Black Caucus where I Chair 43 members, we come from 21 states, we present over 40 million Americans; [applause at 1:10:40.8] five full Committee Chairs, 17 Subcommittee Chairs and others like the Majority Whip and Jim Clyburne from South

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]

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

TRANSCRIPT OF AUDIO FILE:

11-7AMSESSION - LAST 20 MIN

Thank you for working with Accentance for your transcription needs. The text below represents a professional transcriptionist's understanding of the words spoken. No guarantee of complete accuracy is expressed or implied, particularly regarding spellings of names and other unfamiliar or hard-to-hear words and phrases. "(ph)" or "(sp?)" indicate phonetics or best guesses. To verify important quotes, we recommend listening to the corresponding audio. Timestamps throughout the transcript facilitate locating the desired quote, using software such as Windows Media or QuickTime players.

BEGIN PART 3:

REV. DR. SUZAN JOHNSON COOK: Thank you, Mr. Mayor. Thank you for looking so wonderful. He's dapper. Amen. Doesn't he look good? (clapping). Barack stands on your shoulders because you took the blows and showed what a man of faith could do and we thank you for representing us well.

We also are joined by many and will be joined throughout this conference by many elected officials. Some are here this morning; elected officials from the State of New York. You will hear later from the Honorable David Patterson. You've heard from our city controller, William C. Thompson, Jr., Honorable Adolpho Carrion, Jr., President of the Burroughs of the Bronx, Honorable Nick Hardy, the assemblyman from New York State, the Honorable Ruth Hassell Thompson, State Senator of New York State, the Honorable Keith Wright is with us this morning, assemblyman from New York State, the Honorable Inez Dickens, council whip member of the New York City Council, and Honorable Dr. Kendall Stuart, member of the New York City Council. Can we applaud for all of the elected officials of the State of New York? (clapping).

Members of Congress who will be joining us throughout. Some of whom you have heard from them last night and today, the Honorable Donald Payne, Chair of Subcommittee on Western Hemisphere, the Honorable Bennie Thompson, Chair of Homeland Security, Honorable Donna Christensen, the Honorable Chair of Subcommittee on National Resources, Honorable Sheila Jackson-Lee, and now we hope to also hear from one of our presidents of the Congressional Black Caucus, the Honorable Carolyn Cheeks-Kilpatrick. We're going to the federal level you all; who is our (inaudible) president. We're only working with Mr. President. Will you please come and let us receive her this morning for what a wonderful job you have done and you have served with distinction as well, and we celebrate and salute you this morning. Can we applaud the other members of Congress (inaudible) (clapping).

REP. CAROLYN CHEEKS-KILPATRICK: Giving honor to God who's the head of my life, present protocol being established, but I've got to say in comfort even given that. To Fay and Karl, really (inaudible) really from the bottom of all of our hearts, I cannot be this without you. Thank

you very much. We could (inaudible) ever week in our Washington offices and that's how we keep up with the Caribbean. If not for the newspaper, there would be no association that we could actually see and know what's going on and how we plug in. So thank you very much from the bottom of my heart. Thank you very much.

Commissioner Wescott-Williams, as well as all commissioner's who are here, St. Maarten, one more time. Thanks for hosting us. We love you. Thank you very much.

I bring you greetings from the Congressional Black Caucus, where I chair 43 members. We come from 21 states. We represent over 40 million Americans, 5 full mini chairs, 17 subcommittee chairs, and others like the majority whip and Jim Clyburn from South Carolina, and others who helped to control the Congress. We have the first African doctor in the house, a member of our caucus, who chairs our health brain trust and very instrumental in being here. As being here, won't you welcome my sister back, your Congresswoman Donna Christensen? Thank you, Donna. We love you.

It was mentioned earlier that, I'm going to say who else is here, you heard from Donald Payne, and I know if he's hear in this room, you will hear from him again. You did last night. He chairs our Western Hemisphere Committee. Bennie Thompson, who's here, and I think he came through last night, he chairs our Homeland Security Committee. Also will be here. Sheila Jackson-Lee from Houston, Texas. I know many of you know her. En route, she will be here just shortly. Our number uno congressman, second only to John Conyers in seniority, from the great State of New York, Chairman of the House Ways and Means Committee, our big brother. Charlie Rangel, will be here this afternoon.

What you probably don't know is that the federal budget is $3 trillion dollars. Charlie's committee handles $2 trillion of that for Medicare, Medicaid, for veteran's programs. His committee is the committee that produces the revenue, $2 trillion of that given out in what we call, "entitlements" to those programs. I serve on appropriations, where the committee spends the money. I like that too. We spend a million. Charlie generates it and gives it out by formula to the entitlements. Our committee handles the appropriations and sends them out. Together we make up the Congressional Black Caucus.

As it was said earlier, many more members will be coming and have come over the years, but I just wanted to say, a point of personal privilege. This last 6 months, the last 2 months, and the last 2 weeks, Members of the Congressional Black Caucus have been criss-crossing America for our now president, Senator Barack Obama. Even as we had our own election, Tuesday, August 4th, we were all on the ballot as well, but ours wasn't as significant as relates to us as major, but most of us went to many states all over this country. You see, 18 of our members represent less than 50% African-American. Three of our members represent less than 15% African-American. The most that any of us represent is 62% African-American. So we represent all of America; Asians, Africans, Latinos, Europeans, Native Americans. You name it.

We're called the Conscience of the Congress and we really are that. You know, God built us in a certain kind of way. We got some of this stuff in us, as you do with you. Across ethnic lines, it makes us stand up for righteousness, speak up on injustices, and when we see something wrong,

you have to hear it because, of course, we're the Conscience of the Congress. So the disparities that Donna, Congresswoman Christensen, talks about in health care, it's real. They have more because we have less. We hope and we know that with President Obama, yes we have some difficult times and the Mayor laid them out well. And to the sponsors by the way, all of you all. We couldn't do this, be with you, help Karl if you weren't here with us. We say, "thank you very much. You are so important". All the sponsors. Thank you very much.

So as we move through these next 4 years, 2 months, 32 days, talk about the short period between November 5th and August 20th. President Bush is still the president. Our constitution says that if there is unrest or malice or whatever, the sitting president can hold off and not let happen the 20th day. There are few people that know about that. So we don't want any, we were kind of scared about November 4th when we won. We wanted everybody to do prayer. There will be a tone-in and have fun, and all that. Don't burn nothing down. Don't burn up a car and all that because they're waiting. Some people are waiting. Some people are very angry. We are euphoric. God is euphoric and people across ethnic lines, you saw them. The multi-cultural facets of America happy because it was a perfect storm. Financial markets crashing. People losing jobs. Health care unaffordable. Our schools in shambles. Big bad America and we still are; it's just this 8 years we have a man in the White House who knew not Joseph. In his leadership of our country, he not only decimated America, but caused havoc around the world. I know you know that.

So we've got a lot of building to do. What Karl and Fay has done is to energize each of us so we take our rightful places. All of you and all of us together. I'm going to bring into this room 2 of my sisters who we lost over the last year. Congresswoman Stephanie Stubb-Jones, Cleveland, Ohio, will be right here. Right over here, smiling and said 'Let's do this". I want you to give a shout-out for Stephanie. She's up in here right now. Congresswoman Juanita Milligram-McDonald from Los Angeles, also with the ancestors are up in here right now. Both chair people I might add. Congresswoman Stephanie Stubb-Jones (sp) of our Ethics Committee and Congresswoman Juanita (inaudible) McDonald of our House Administration Committee. Finally, all during this tenure, 2 years is what Congress is, this is the 110th congress. So many historical things have happened that I mentioned to you already, including electing our first African-American president. Then finally Julia Carson from Indianapolis, Indiana, also (inaudible) has been to this conference many many times.

So my brothers and sisters across racial, ethnic gender, geographic, biological, (inaudible) we have much work to do, but it can be done. Because I believe there is a higher power who's directing all of this. We just have to know it and believe it, and do it, and be centered in a higher power.

So as members of the Congressional Black Caucus, as we go back next week to address the financial crisis. You all have been hearing about this $700 billion, every time I say it, we handle a trillion, our committee. $700 billion is what we just gave out or given out as we speak. The good thing about that, they were trying to give it all out. $300 billion of it is gone, but the good news, the new president, anything they put in force, he can pull it back. So we have an opportunity to do some real comprehensive stuff.

The housing market? No more foreclosures. Those same people who got the $700 billion, they were the ones who caused 80%, 85% of the foreclosing. Do you all know that? Predatory lending.

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

United States of America and the Caribbean region. I am again so thrilled to hear so many of you speak of kinship, relationships, and ancestry as you recognize this region for what it is.

Term water (sp)? Yes. Maybe, but definitely a part of the United States of America. However you take it or twist it. The Diaspora of the West Indies and the United States of America. It's big. It is great and we need to continue to recognize that forging those relationships strengthen it year after year through this conference call is extremely important. As if it wasn't enough to realize that we were going to start a conference two days after such an important election, just barely three weeks ago, St. Maarten was brushed by Hurricane Omar, a category 3 hurricane. So if you were around and you noticed that the scenery is not exactly what you expected of it, if you feel a little in the roads as you go from place to place, recognize that that is what had happened. But Karl decided the conference was going to go on and the conference will go on, Karl, right here in St. Maarten.

So tonight it is my pleasure to host you at another side of the island because you are here two days after the election, two days after a historic election, and yes, notwithstanding the turmoil and the challenges, President Barak Obama is going to face, the party too will continue and the party on St. Maarten will continue this evening on the other side of the island hosted by the Government of St. Maarten. I encourage you and those who are part of the latest workshop this afternoon, to do it well, right, and try to get out as soon as possible so that we can move from here in a timely fashion and the police escort will only be something to show you how proud we are of having all of you here. But we will get to the other side of the island nicely, on time. A region in transition. Thank you for being here at this time in your history and in our history.

I welcome all of you and it is wonderful to be able to open this conference in a time like this because it is for such a time that you are here and we are here, and it is such a time that President Barak Obama was chosen to lead the United States of America and, with that leadership, to be the leader of the free world. If, just if, approximately 40,000 more persons voted could have given him even more votes, he would have had those from right here on St. Maarten, the friendly island of the early (inaudible). So today, we too rejoice with you and we too are hopeful that the change that is coming will be a good one for all of us. We just hope that some of that invigoration and renewed energy that we all will get from this conference will serve you well, when you go back and will serve us well as we continue to build our island nations from strength to strength and with God, all things are possible. Have we not seen that on November 4, 2008. What a wonderful way to celebrate and, Karl, what a wonderful thing to happen (inaudible) St. Maarten and deciding the conference welcomes the 13th Annual Multi-National Caribbean Business Conference. Thank you. Welcome. Enjoy it and may God continue to bless you richly. Thank you.

The question was how 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

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

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:	March 17, 2009
Location:	AkinGump NYC - 399 Park Ave, New York, NY
Time:	approximately 2:00 to 4:00 p.m.
Participants:	Leo Wise Omar Ashmawy

Summary: The Representative of Citi was the Citi employee who managed their donation to the Thirteenth Annual Multinational Business Conference. The OCE requested an interview with the Representative of Citi and he consented. The Representative of Citi was given an 18 U.S.C. § 1001 warning and he signed a written acknowledgement of the warning. 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.
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 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.

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

14. Eve did not have a sit-down meeting with the members of Congress in attendance to the Representative of Citi's knowledge.

15. The Representative of Citi did not have more than "cursory" conversations with the Members of Congress who attended. He saw all members that attended more than once. He saw most of them on Friday and had seen everyone by Saturday.

    a. The Representative of Citi recalled Congressman Rangel was there. The Representative of Citi thought he first saw him on Friday and saw him on Saturday. The Representative of Citi thought he saw him at different events.

    b. The Representative of Citi saw Congressman Payne on more than one occasion.

    c. The Representative of Citi saw Representative Kilpatrick early on Friday. He does not recall her speaking.

    d. The Representative of Citi saw Representative Thomson on Thursday; he saw him on more than one occasion.

16. 300 to 350 people typically attended the event. It was open to anyone.

17. The conference was billed as the Carib News conference. Rodney is the publisher and CEO of the Carib News. In May or June one would start seeing advertisements for the conference on the back page of the Carib News. The Representative of Citi thought Citi's check went to the Carib News Foundation but did not know what the Foundation did other than the conference. The Representative of Citi thought the conference was "totally" financed by the sponsors. He did not know if Carib News put up any money for the conference.

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.

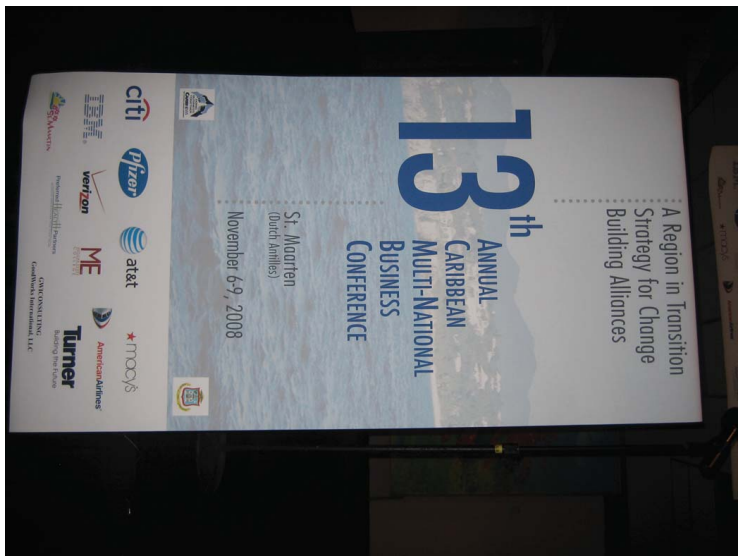
22. The Representative of Citi also knows Rodney from the Board of the University of the West Indies. Both he and Rodney are members and participate in telephone meetings and, occasionally, in in-person meetings.

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

EXHIBIT 5


A Region in Transition
Strategy for Change
Building Alliances
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St. Maarten
(Dutch Antilles)
November 6-9, 2008
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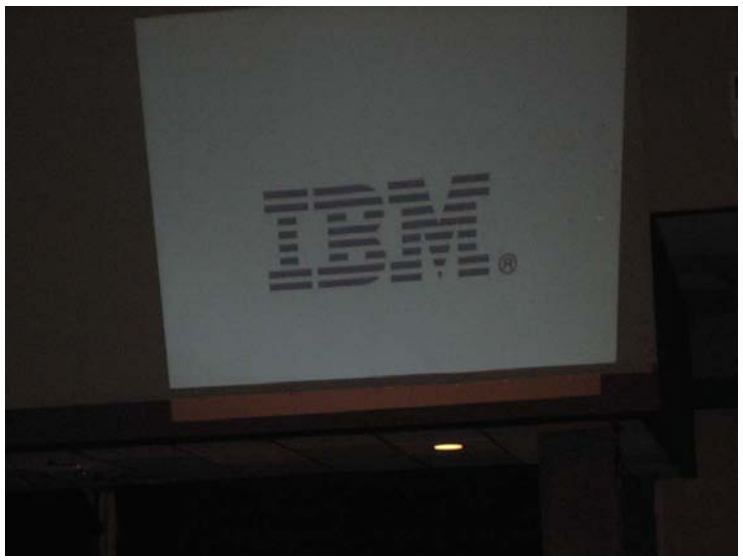

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Business Conference
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EXHIBIT 6

STROOCK

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May 18, 2009

BY EMAIL AND REGULAR MAIL

Mr. Leo Wise
Staff Director & Chief Counsel
Office of Congressional Ethics
United States House of Representatives
1017 Longworth House Office Building
Washington, DC 20515

Re: Request for Information, Review No. 09-2567

Dear Mr. Wise:

In response to your request for our clients' voluntary cooperation regarding your office's questions pertaining to the Thirteenth Annual Caribbean Multi-National Business Conference (the "Conference"), we submit the following responses. Based upon our review of the questions and our multiple conversations with your office, we believe that these responses contain the information that you are seeking. As with our previous production, to the extent that the Freedom of Information Act is applicable to any submissions made to the Office of Congressional Ethics, our clients hereby request that the information provided be treated confidentially.

The Host country participated in the Conference as follows: (1) developed local Host Committees to facilitate local planning, (2) helped to negotiate the rate with the hotel, (3) assisted in developing the theme of the Conference, (4) assisted in identifying local speakers, including the Leader of Government, (5) assisted in local publicity, (6) provided local entertainment, including a school choir and cultural items, (7) arranged Host Country Evening on Friday, November 8 (the group was transported to another property for refreshments and entertainment), (8) helped with local transportation for some Carib News employees and helped arrange accommodations for some guests (not paying for such accommodations), (9) participated

as event Speakers, and (10) issued invitations to attend to specially invited guests. The Host Country provided no funds towards the cost of the Conference.

The cost for members of the public to attend the conference for the four days and three nights was $840.00 for double occupancy or $1085.00 for single occupancy. The cost of attendance covered room accommodations, meals, and admission to the Conference presentations.

The attending Members of Congress participated in sessions relevant to their Committee assignments in Congress and demonstrated interest in a particular subject matter. For example, Congressman Bennie Thompson spoke at presentations on Hemispheric Security and Immigration/ Deportees, Congresswoman Donna Christensen spoke at a Town Hall Forum on Health, and Congressman Charles Rangel spoke at presentations on Haiti and the Caribbean, and the current crises facing them. In addition, all of the Members of Congress participated in a session with the local Ministers of Government to discuss issues of interest to the Caribbean region. Though correspondence with the Members of Congress indicated that a memo of the Closed Door Session would be distributed after the Conference, no such memo was ever drafted or distributed.

The total cost of the Conference approached $300,000. These costs included direct expenses such as travel, event planner fees, local staffing, and hotel payments, as well as Carib News operating expenses for the purpose of the preparation and implementation of the Conference. The Conference costs were paid using (1) registration fees by the attending guests, (2) contributions from corporate participants, some to Carib News and others to Carib News Foundation, and (3) general funds of Carib News. Each of three sources of funding was pooled together to pay the various expenses.

If you have any questions regarding this information, please do not hesitate to call.

Very truly yours,

Joel Cohen

and

Danielle Alfonzo Walsman

EXHIBIT 7

AKIN GUMP
STRAUSS HAUER & FELD LLP
Attorneys at Law

STEVEN R. ROSS
202.887.[redacted] fax: 202.887.4288
[redacted]@akingump.com

March 31, 2009

Mr. Leo J. Wise
Staff Director and Chief Counsel
Office of Congressional Ethics
1017 Longworth Building
Washington D.C. 20515

Re: Citigroup, Inc. Production

Dear Leo:

On behalf of our client, Citigroup Inc., we are providing you with two documents in response to your oral request of March 17, 2009. Please find a copy of a solicitation letter to support the 2008 Caribbean Multi-National Business Conference, dated April 4, 2008, from Carib News Foundation to our client. In addition, please find a copy of both the front and back of check number 5006611264, dated June 13, 2008, payable to Carib News Inc. in the amount of $75,000.00. A search of our client's records has not uncovered any evidence of a receipt being provided for the above-mentioned check. We will produce this document should it be identified.

The documents we are producing today are confidential and proprietary in nature, and have been marked accordingly. We ask that these documents be kept confidential by your Office and your staff. Notwithstanding our request that these documents be kept confidential, due to their sensitivity, we ask that your office or staff provide us with notice and an opportunity to be heard before disclosure of any information from these documents to any third parties.

In addition, we are providing you with an original signed document of Michael Flanigan dated March 23, 2009, acknowledging the False Statements Act.

Please let me know if you have any questions.

Sincerely,

Steven R. Ross

Privacy Citigroup.com

citi

Citi Check Image Delivery

Print Close Window

Check Image Inquiry Results

Account #	Check #	Amount	Paid Date
[redacted]	5006611264	$75,000.00	06/24/2008

citigroup
CITIGROUP PAYMENT SERVICES

CITIGROUP BUSINESS SERVICES
PAYMENT SERVICES
3800 CITIBANK CENTER DR, G-3-4
TAMPA, FL 33610
CUSTOMER SERVICE (813) 601-1234

62-20
311

No. 5006611264
Date: 13-JUN-2008
Vendor No. 295513

PAY TO THE ORDER OF

CARIB NEWS INC S501718335 07 062308. CHARGE
7 WEST 36TH STREET 8TH FLOOR
NEW YORK NY 10018

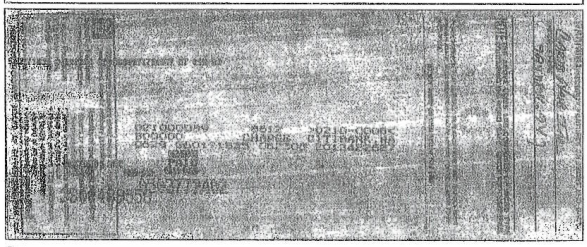
**75,000.00
NOT VALID AFTER 180 DAYS

SEVENTY-FIVE THOUSAND AND 00/100 DOLLARS**

Andrea Hammond

CITIBANK (DELAWARE), A SUBSIDIARY OF CITIGROUP
ONE PENNS WAY, NEW CASTLE, DE 19720

⑈5006611264⑈ [redacted] [redacted] ⑈000?500000⑆



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

April 04, 2008

Mr. Eric Eve
Senior Vice President
Community Relations
Global Consumer Group
Citigroup Inc.
850 Third Avenue, 12th floor
New York, NY 10022

Dear Mr. Eve:

For the past twelve years, the annual Caribbean Multi-National Business Conference has been instrumental in encouraging investment, cross-border trade and business partnerships, the role played by executives of major corporations, medium and small-size businesses and entrepreneurs, and deepens the connections with key elected officials.

Your support and that of ***CITI*** went a long way to make the Conference a success, and has fostered on-going growth in business achievements and impactful policy decisions. We appreciate your encouragement, your personal participation, and the very stature your presence brings to the Conference. We do get concrete results and expressed appreciation of new opportunities.

We can assure you that all the key stakeholders, Members of Congress, Heads and Ministers of Government, Elected Officials, Community and Business Leaders are all aware and appreciative of yours and ***CITI'S*** participation in this very important mission.

This year, the Thirteenth Annual Conference is scheduled to be held in St. Maarten, November 6 – 9, 2008, and promises to further strengthen and expand on the work done by many of the Caribbean countries developing economies, in collaboration with the emerging markets initiatives in the U.S. The quality of the sessions and the high level of participation is now legendary, and is anxiously awaited each year.

Enclosed is a Power Point presentation of the sponsorship opportunities the Conference provides, and also a program and recap of the 2006-2007 Conference. We know of your interest to deepen the ***CITI*** local, regional and global connections, and I know the Conference can achieve that. It is our sincere wish that this presentation motivates your sponsorship.

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

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

CARIBBEAN
MULTI-NATIONAL
BUSINESS
CONFERENCE

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

09-2222_79

"IMPACTFUL"

EXPERIENCE THE POWER OF THE

THIRTEENTH ANNUAL CARIBBEAN MULTI-NATIONAL BUSINESS CONFERENCE

ST. MAARTEN
NOVEMBER 6 – 9, 2008

BUILDING KEY CONNECTIONS FOR GROWTH

DOING BUSINESS TOGETHER
CARIBNEWS
MULTI-NATIONAL BUSINESS CONFERENCE

09-2222_80

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.

DOING BUSINESS TOGETHER
CARIBNEWS

09-2222-81

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.

DOING BUSINESS TOGETHER
CARIBNEWS
MULTI-NATIONAL BUSINESS CONFERENCE

09-2222_82

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

DOING BUSINESS TOGETHER
CARIBNEWS

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

DOING BUSINESS TOGETHER
CARIBNEWS
MULTI NATIONAL BUSINESS CONFERENCE

THE LEGACY

- Jamaica – 1996
- Barbados – 1997
- St. Lucia – 1998
- St. Croix/USVI – 1999
- Jamaica – 2000
- Grenada – 2001
- St. Maarten - 2002
- The Bahamas-2003
- St. Kitts-Nevis-2004
- ST. Thomas, USVI – 2005
- Panama city, panama – 2006
- Antigua & Barbuda - 2007

- Building Consumers Awareness
- Developing Working Alliances
- Reaching Defined Target Markets
- Making the Right Connections
- Expanding Diverse Market Places
- Successful Joint/Ventures

Successful Regional Investments

DOING BUSINESS TOGETHER
CARIBNEWS
MULTI-NATIONAL BUSINESS CONFERENCE

09-2222_85

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"

DOING BUSINESS TOGETHER
CARIBNEWS
MULTI-NATIONAL BUSINESS CONFERENCE

09-2222_86

PARTICIPATION

Platinum LEVEL - $75,000

- Keynote Speaker at Main Event
- Sponsor Private VIP Reception and specially arranged forum
- Special Awards Presentation
- Display, Exhibition and signage
- Area of Conference -Reserved for exclusive sponsorship
- Full page Ad in program
- Air Transportation for 2 people
- Accommodations: One Suite and One Standard Room
- Included in all printed materials
- Included in Internet promotion
- Display company logo and link to our website
- Sponsor of a Gala Event
- Sponsor and Participate in a workshop
- Representative listed in program with bio and photo

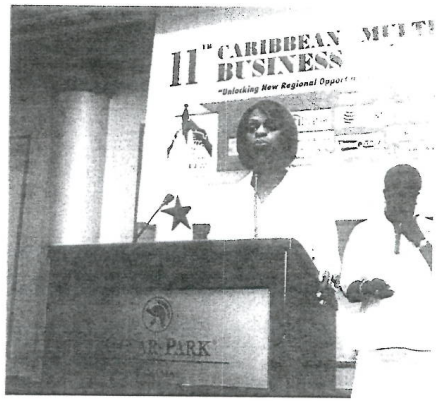
DOING BUSINESS TOGETHER
CARIBNEWS

09-2222_87

PARTICIPATION

GOLD LEVEL - $50,000

- Sponsor a Workshop
- Sponsor a Gala Event
- Display , Exhibition and signage
- Included in all Printed Material
- Included in all Internet Promotion
- Display of Company Logo and Link to Our Website
- Full Page Ad in Program
- Representation in the Brochure
- Air Transportation & room accommodations for 1



DOING BUSINESS TOGETHER
CARIBNEWS
MULTI-NATIONAL BUSINESS CONFERENCE

09-2222_88

PARTICIPATION

SILVER LEVEL - $25,000

- Sponsor & Participate in a Workshop
- Display and Exhibition
- Banner in Public areas & at workshop
- Included in all printed materials
- Included in Radio and TV Promotions
- Included in the internet promotion
- Sponsor an event i.e. breakfast, lunch or dinner
- Full Page ad in program and recap
- Representatives listed in program with bio & photos
- Representatives listed in brochure

DOING BUSINESS TOGETHER
CARIBNEWS
MULTI-NATIONAL BUSINESS CONFERENCE

09-2222_89

PARTICIPATION

SUPPORTER

$15,000	$10,000
♦ Display and Exhibition	♦ Display and Exhibition
♦ Banner in Public areas & at workshop	♦ Banner in Public areas & at workshop
♦ Included in all printed materials	♦ Included in some printed materials
♦ Included in Radio and TV Promotions	♦ Included in some Radio and TV Promotions
♦ Included in the internet promotion	♦ Included in the internet promotion
♦ Full Page ad in program and recap	♦ Full Page ad in program and 1/2 page in recap
♦ Representatives listed in brochure	♦ Representatives listed in program
♦ Representatives listed in program with bio & photo	

ABD DOING BUSINESS TOGETHER CARIBNEWS MULTI NATIONAL BUSINESS CONFERENCE

Government Participation

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

"The conference is central to the promotion of our mutual interests in the U.S. in general, New York City in particular, and the Caribbean. It is essential for all of us to work together to spur economic growth and social expansion at home and in our neighborhoods."
William Thompson, Comptroller, New York City

"The Conference in Antigua with Members of the U.S. Congress was very important and extremely vital to both the U.S. and Caribbean interests. It highlighted the need for the Caribbean to pay greater attention to the role of Congress in the formulation of U.S. policy".
Hon. Baldwin Spencer
Prime Minister of Antigua

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

DOING BUSINESS TOGETHER
CARIBNEWS
MULTI-NATIONAL BUSINESS CONFERENCE

CORPORATE PARTICIPANTS

*Eric Eve – SVP Community Relations, **CITIGROUP-*** "The time is ripe for Caribbean nations to come together and get on "the road," to articulate the strength of their economies and stability of their business climates. The Conference is a great place to start to open clear lines of communication between the private and public sectors of the Caribbean and the U.S."

*Marilyn Johnson, VP Market Development, **IBM Corporation** –* "IBM and its partner ENI Enterprise Network, through its presentation at the Conference, is taking the audience up through levels of technology, understanding the application of E-commerce. This conference makes a difference in the lives of the attendees."

Karen Boykin-Towns, Senior Director of Public Affairs- "The conference provides an ideal opportunity for Pfizer – it demonstrates its commitment to heath forums internationally, but also to network with key decision makers. Collaboration is necessary between the Caribbean to make improvements and adjustments to healthcare and its delivery."

*Edward J. Goldberg, SVP Government & Consumer **Affairs, MACY'S** –* "We have whole files of opportunities to build business partnerships in the current corporate environment. The conference is conducive to exploring new areas of business, and we have taken advantage of this to both the region and ***MACY's*** benefit."

*Marie Long, VP Constituency Relations, **AT&T Foundation** –* "As many of you know, AT&T has changed in the last 5 years. Its growth, dynamism and change have created what some of us call the new AT&T. The real and driving force behind our success as a corporate entity is the culture of inclusion and collaboration. We recognize the great work being done at the conference to improve business and personal lives, exchange ideas, and assist alternative strategies that could lead to technology transfer and to growth."

*Javier Evans, FVP Human Resources, **HSBC Bank** –* "We provide financial services to a vast array of businesses and individuals, and this gives us a unique perspective on different cultures and ways of doing business. We want to engage our partners in mutually beneficial relationships within our communities and that is why we seize the opportunity to link with ***CARIB NEWS*** and the Conference. It is a tremendous value to us."

DOING BUSINESS TOGETHER
CARIBNEWS

09-2222_92

UNIQUE OPPORTUNITIES

Ambassador Andrew Young

"If only the sons and daughters of Africa will remember from whence they came, then our roots should be a constant reminder of who we are and where our countries can go with our input. This is why the Carib News Conference is so important and that is why I support it."

Hon. Percy Sutton

"We badly needed a forum to address the need of us working together. This conference is an excellent idea and we should have been doing this long ago."

Hazel N. Dukes, President, New York State NAACP

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

Harry Belafonte, Entertainer

"The Conference is like a table set with a feast of great ideas provided by some of the best minds. The table is set - it is for us to partake"

DOING BUSINESS TOGETHER
CARIBNEWS
MULTI-NATIONAL BUSINESS CONFERENCE

David Dinkins, Former Mayor of New York City

"Education is the very key for the development of our people. I have always held that position; that is why I am so pleased to participate in the Education Forum at the Conference. There is an eagerness on the part of the audience to know more about our system. The collaborative effort of ***CARIB NEWS*** and the Conference wins my support".

Roy Hastick, President/CEO Caribbean American Chamber of Commerce

"The work of the Conference is legendary in the Caribbean and the U.S. Where else do you find this level of leadership from all sectors coming together to advance doing business. It is the most effective way of building a Global Network".

Susan Taylor, Editor Emeritus, Essence Magazine

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

Lloyd Williams, President/CEO Greater Harlem Chamber of Commerce

"I have always advocated cross-border business opportunities for the Chamber members, and that is why for the entire twelve years of the conference, the Chamber has made it a priority event. Our members have reaped the benefits and have also made great contributions".

09-2222_93

INVEST IN SUCCESS

A WEEK-END THAT CHANGES LIVES

'EXPERIENCE THE POWER'

DOING BUSINESS TOGETHER
CARIBNEWS

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

Public Law 104–292
104th Congress

An Act

To amend title 18, United States Code, with respect to the crime of false statement in a Government matter.

Oct. 11, 1996
[H.R. 3166]

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

False Statements Accountability Act of 1996.
18 USC 1001 note.

SECTION 1. SHORT TITLE.

This Act may be cited as the "False Statements Accountability Act of 1996".

SEC. 2. RESTORING FALSE STATEMENTS PROHIBITION.

Section 1001 of title 18, United States Code, is amended to read as follows:

"§ 1001. Statements or entries generally

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

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

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

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

shall be fined under this title or imprisoned not more than 5 years, or both.

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

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

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

"(2) any investigation or review, conducted pursuant to the authority of any committee, subcommittee, commission or office of the Congress, consistent with applicable rules of the House or Senate.".

SEC. 3. CLARIFYING PROHIBITION ON OBSTRUCTING CONGRESS.

Section 1515 of title 18, United States Code, is amended—

(1) by redesignating subsection (b) as subsection (c); and

(2) by inserting after subsection (a) the following new subsection:

"(b) As used in section 1505, the term 'corruptly' means acting with an improper purpose, personally or by influencing another, including making a false or misleading statement, or withholding, concealing, altering, or destroying a document or other information.".

SEC. 4. ENFORCING SENATE SUBPOENA.

Section 1365(a) of title 28, United States Code, is amended in the second sentence, by striking "Federal Government acting within his official capacity" and inserting "executive branch of the Federal Government acting within his or her official capacity, except that this section shall apply if the refusal to comply is based on the assertion of a personal privilege or objection and is not based on a governmental privilege or objection the assertion of which has been authorized by the executive branch of the Federal Government".

SEC. 5. COMPELLING TRUTHFUL TESTIMONY FROM IMMUNIZED WITNESS.

Section 6005 of title 18, United States Code, is amended—

(1) in subsection (a), by inserting "or ancillary to" after "any proceeding before"; and

(2) in subsection (b)—

(A) in paragraphs (1) and (2), by inserting "or ancillary to" after "a proceeding before" each place that term appears; and

(B) in paragraph (3), by adding a period at the end.

Approved October 11, 1996.

LEGISLATIVE HISTORY—H.R. 3166 (S. 1734):

HOUSE REPORTS: No. 104–680 (Comm. on the Judiciary).
CONGRESSIONAL RECORD, Vol. 142 (1996):
July 16, 17, considered and passed House.
July 25, considered and passed Senate, amended.
Sept. 26, House concurred in Senate amendments with an amendment.
Sept. 27, Senate concurred in House amendment.

○

EXHIBIT 8

Board
David Skaggs, Chair
Yvonne Burke
Karan English
Allison Hayward
Porter Goss, Co-Chair
Jay Eagen
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
1111 Constitution Avenue, NW
Washington, DC 20224

March 31, 2009

Dear Mr. Weber,

Thank you for talking with me this afternoon and for offering to help me with this request. I need to know if Carib News Charities filed a 990-PF for tax years 2006, 2007, and 2008 (I have included tax year 2008 in the event that the foundation filed before the filing deadline). I understand that the organization is not required to file if it did not receive donations in excess of $25,000. If the foundation has filed a 990-PF for 2006, 2007, or 2008, we would like to have a copy of the tax form(s). In the event that it takes several days, weeks, or months to receive the requested copies, it would be helpful to have an answer to the question whether the organization has filed and for what year(s) tax form(s) exist.

It is our understanding that the organization also does business as Carib News Foundation; however, Carib News Foundation is not found in Publication 78.

My telephone number is 202-225-9739 and my email is Elizabeth.horton@mail.house.gov. Thank you again for your help with this matter.

Sincerely,

Elizabeth Horton

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.

- **Internet.** Form 8871, Political Organization Notice of Section 527 Status, and Form 8872, Political Organization Report of Contributions and Expenditures, are available for inspection and printing from the Internet. The website address for both forms is **www.irs.gov/polorgs.**
- **Public disclosure by the organization.** Exempt or political organizations must make their returns, reports, notices, and exempt applications available for public inspection. You can visit the organization to inspect the material instead of requesting it from the IRS. The organization may be able to mail the copies to you.

1 Exempt or political organization. *If a multiple request, please attach list of names, forms, and tax years.*

Name: CARIB NEWS CHARITIES
Employer identification number (if known): 13 : 3632050
Address: 7 WEST 36th STREET, FLOOR 8
City or town, state, and ZIP code: NEW YORK, NY 10018

2 Requester

Name: OFFICE OF CONGRESSIONAL ETHICS
Contact person: ELIZABETH HORTON
Address: 1017 LONGWORTH BUILDING
Phone: (202) 225-9739
City or town, state, and ZIP code: WASHINGTON, DC 20515
Date: 3/31/09

3 Category of requester: ☐ Commercial user ☐ Non-commercial scientific institution
You must check a box. ☐ Educational institution ☐ Media ☑ All others

4 Reason for request. All requesters except for commercial users must provide an explanation of how the records will be used to avoid being charged the commercial rate. Attach additional sheets if necessary.
TO CONFIRM WHETHER FOUNDATION RECEIVED FUNDING IN TAX YEARS 2006, 2007, 2008

Lines 5–9. For each applicable form, check the box(es) for the item(s) you are requesting. You may request more than one form. For each form requested, check either the copy, inspection, or CD/DVD box and enter the specific tax year(s), as indicated. If ordering a partial set on CD/DVD, indicate the format, state(s), and month(s) requested.

5 Form 990, Form 990-EZ
☐ Copy ☐ Inspection
Tax year(s) requested: _____; _____; _____.
☐ CD/DVD Format: ☐ Alchemy ☐ Raw
State(s): _____; _____; _____.
Months: _____; _____; _____.

6 Form 990-PF
☑ Copy ☐ Inspection
Tax year(s) requested: 2006; 2007; 2008 (if filed)
☐ CD/DVD Format: ☐ Alchemy ☐ Raw
State(s): _____; _____; _____.
Months: _____; _____; _____.

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
Tax year(s) requested: _____; _____; _____.

9 Form 1023, 1024 or Determination Letter
☐ Copy ☐ Inspection
Tax year(s) requested: _____; _____; _____.

IRS Use Only

The form requested above was inspected by (name of requester)	IRS office where inspection was made
Signature of employee present at inspection	Date

For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions. Cat. No. 41722P Form **4506-A** (Rev. 1-2009)

09-2222_99

IRS Department of the Treasury
Internal Revenue Service

OGDEN UT 84201-0058

OFFICE OF CONGRESSIONAL ETHICS
ATTN: ELIZABETH HORTON
1017 LONGWORTH BUILDING
WASHINGTON DC 20515

CUT OUT AND RETURN THE VOUCHER AT THE BOTTOM OF THIS PAGE IF YOU ARE MAKING A PAYMENT, EVEN IF YOU ALSO HAVE AN INQUIRY.

The IRS address must appear in the window.

0412606945

BODCD-TE

Use for payments

Letter Number: LTR3983C
Letter Date : 2009-04-17
Tax Period : 000000

133632050

INTERNAL REVENUE SERVICE

OGDEN UT 84201-0058

OFFICE OF CONGRESSIONAL ETHICS
ATTN: ELIZABETH HORTON
1017 LONGWORTH BUILDING
WASHINGTON DC 20515

133632050 RV CARI 00 2 000000 670 00000000000

09-2222_100

Department of the Treasury
Internal Revenue Service

OGDEN UT 84201-0058

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

OFFICE OF CONGRESSIONAL ETHICS
ATTN: ELIZABETH HORTON
1017 LONGWORTH BUILDING
WASHINGTON DC 20515

Taxpayer Identification Number: 13-3632050
Organization: Carib News Charities, Inc.

Form(s): 990PF

Tax Period(s): May 31, 2006 May 31, 2007
May 31, 2008

Dear Requester:

We received your Mar. 31, 2009, request for a copy of the Form(s) 990PF relating to the organization(s) identified above. Enclosed is a copy of the form(s) you requested. We are unable to provide a copy of the form(s) requested for the following tax period(s):

May 31, 2006

We regret that we can not provide a photocopy of return(s) for the organization(s) and year(s) you requested. There are a variety of reasons why these returns are not available, for example:

- the organization may not be required to file the requested return because its gross receipts are $25,000 or less.
- the organization may be included in a group ruling and the parent may have filed a group return.
- the organization may have received an extension of time to file.
- processing of the organization's return may not be complete.
- return(s) are destroyed after a certain number of tax years.
- the organization may not be required to file.

If you have any questions, please write us at the address shown at the top of the first page of this letter. Or, you may call us toll free at 1-877-829-5500.

Whenever you write, please include this letter and, in the spaces below, give us your telephone number with the hours we can reach you. Please keep a copy of this letter for your records.

Telephone Number ( ) _____ Hours _____

09-2222_101

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Form **990-PF**

Department of the Treasury
Internal Revenue Service

Return of Private Foundation

or Section 4947(a)(1) Nonexempt Charitable Trust Treated as a Private Foundation

Note: *The organization may be able to use a copy of this return to satisfy state reporting requirements*

OMB No 1545-0052

2005

For calendar year 2005, or tax year beginning June 1 , 2005, and ending May 31 , 20 06

G Check all that apply. ☐ Initial return ☐ Final return ☐ Amended return ☐ Address change ☐ Name change

Use the IRS label. Otherwise, print or type. See Specific Instructions.	Name of organization: Caib News Charities Inc Number and street (or P O box number if mail is not delivered to street address): 15 West 39th Street Room/suite: 13 City or town, state, and ZIP code: New York, NY 10018
	A Employer Identification number: 13:3632050 B Telephone number (see page 10 of the instructions): ( )
	C If exemption application is pending, check here ▶ ☐ D 1. Foreign organizations, check here ▶ ☐ 2. Foreign organizations meeting the 85% test, check here and attach computation ▶ ☐
H Check type of organization: ☑ Section 501(c)(3) exempt private foundation ☐ Section 4947(a)(1) nonexempt charitable trust ☐ Other taxable private foundation	E If private foundation status was terminated under section 507(b)(1)(A), check here ▶ ☐ F If the foundation is in a 60-month termination under section 507(b)(1)(B), check here ▶ ☐
I Fair market value of all assets at end of year (from Part II, col. (c), line 16) ▶ $ J Accounting method: ☑ Cash ☐ Accrual ☐ Other (specify) ..... (Part I, column (d) must be on cash basis.)	

Part I Analysis of Revenue and Expenses (*The total of amounts in columns (b), (c), and (d) may not necessarily equal the amounts in column (a) (see page 11 of the instructions)*)

		(a) Revenue and expenses per books	(b) Net investment income	(c) Adjusted net income	(d) Disbursements for charitable purposes (cash basis only)
Revenue	1 Contributions, gifts, grants, etc , received (attach schedule)	0			
	2 Check ▶ ☐ if the foundation is not required to attach Sch B				
	3 Interest on savings and temporary cash investments				
	4 Dividends and interest from securities				
	5a Gross rents				
	b Net rental income or (loss)				
	6a Net gain or (loss) from sale of assets not on line 10				
	b Gross sales price for all assets on line 6a				
	7 Capital gain net income (from Part IV, line 2)				
	8 Net short-term capital gain				
	9 Income modifications				
	10a Gross sales less returns and allowances				
	b Less: Cost of goods sold				
	c Gross profit or (loss) (attach schedule)				
	11 Other income (attach schedule)				
	12 Total. Add lines 1 through 11				
Operating and Administrative Expenses	13 Compensation of officers, directors, trustees, etc				
	14 Other employee salaries and wages				
	15 Pension plans, employee benefits				
	16a Legal fees (attach schedule)				
	b Accounting fees (attach schedule)				
	c Other professional fees (attach schedule)				
	17 Interest				
	18 Taxes (attach schedule) (see page 14 of the instructions)				
	19 Depreciation (attach schedule) and depletion				
	20 Occupancy				
	21 Travel, conferences, and meetings				
	22 Printing and publications				
	23 Other expenses (attach schedule)				
	24 Total operating and administrative expenses. Add lines 13 through 23				
	25 Contributions, gifts, grants paid				
	26 Total expenses and disbursements. Add lines 24 and 25				
	27 Subtract line 26 from line 12:				
	a Excess of revenue over expenses and disbursements	&			
	b Net investment income (if negative, enter -0-)				
	c Adjusted net income (if negative, enter -0-)				

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IRS - OSC -645
AUG 27 2007
OGDEN, UTAH

SCANNED JAN 16 2008

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Form 990-PF (2005) Page 2

Part II Balance Sheets Attached schedules and amounts in the description column should be for end-of-year amounts only (See instructions)

			Beginning of year	End of year	
			(a) Book Value	(b) Book Value	(c) Fair Market Value
Assets	1	Cash—non-interest-bearing	0		0
	2	Savings and temporary cash investments			
	3	Accounts receivable ▶			
		Less: allowance for doubtful accounts ▶			
	4	Pledges receivable ▶			
		Less: allowance for doubtful accounts ▶			
	5	Grants receivable			
	6	Receivables due from officers, directors, trustees, and other disqualified persons (attach schedule) (see page 15 of the instructions)			
	7	Other notes and loans receivable (attach schedule) ▶			
		Less allowance for doubtful accounts ▶			
	8	Inventories for sale or use			
	9	Prepaid expenses and deferred charges			
	10a	Investments—U S and state government obligations (attach schedule)			
	b	Investments—corporate stock (attach schedule)			
	c	Investments—corporate bonds (attach schedule)			
	11	Investments—land, buildings, and equipment basis ▶			
		Less accumulated depreciation (attach schedule) ▶			
	12	Investments—mortgage loans			
	13	Investments—other (attach schedule)			
	14	Land, buildings, and equipment basis ▶			
		Less accumulated depreciation (attach schedule) ▶			
	15	Other assets (describe ▶)			
	16	**Total assets** (to be completed by all filers—see page 16 of the instructions Also, see page 1, item I)	0	0	0
Liabilities	17	Accounts payable and accrued expenses	0	0	
	18	Grants payable			
	19	Deferred revenue			
	20	Loans from officers, directors, trustees, and other disqualified persons			
	21	Mortgages and other notes payable (attach schedule)			
	22	Other liabilities (describe ▶)			
	23	**Total liabilities** (add lines 17 through 22)	0	0	
Net Assets or Fund Balances		**Organizations that follow SFAS 117, check here ▶ ☐ and complete lines 24 through 26 and lines 30 and 31.**			
	24	Unrestricted			
	25	Temporarily restricted			
	26	Permanently restricted			
		Organizations that do not follow SFAS 117, check here ▶ ☐ and complete lines 27 through 31.			
	27	Capital stock, trust principal, or current funds			
	28	Paid-in or capital surplus, or land, bldg., and equipment fund			
	29	Retained earnings, accumulated income, endowment, or other funds			
	30	**Total net assets or fund balances** (see page 17 of the instructions)	0	0	
	31	**Total liabilities and net assets/fund balances** (see page 17 of the instructions)	0	0	

Part III Analysis of Changes in Net Assets or Fund Balances

1	Total net assets or fund balances at beginning of year—Part II, column (a), line 30 (must agree with end-of-year figure reported on prior year's return)	0
2	Enter amount from Part I, line 27a	
3	Other increases not included in line 2 (itemize) ▶	
4	Add lines 1, 2, and 3	
5	Decreases not included in line 2 (itemize) ▶	
6	Total net assets or fund balances at end of year (line 4 minus line 5)—Part II, column (b), line 30	

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Form 990-PF (2005) Page 3

Part IV Capital Gains and Losses for Tax on Investment Income

	(a) List and describe the kind(s) of property sold (e.g., real estate, 2-story brick warehouse, or common stock, 200 shs. MLC Co.)	(b) How acquired P—Purchase D—Donation	(c) Date acquired (mo., day, yr.)	(d) Date sold (mo., day, yr.)
1a				
b				
c				
d				
e				

	(e) Gross sales price	(f) Depreciation allowed (or allowable)	(g) Cost or other basis plus expense of sale	(h) Gain or (loss) (e) plus (f) minus (g)
a				
b				
c				
d				
e				

Complete only for assets showing gain in column (h) and owned by the foundation on 12/31/69

	(i) F.M.V. as of 12/31/69	(j) Adjusted basis as of 12/31/69	(k) Excess of col. (i) over col. (j), if any	(l) Gains (Col. (h) gain minus col. (k), but not less than -0-) or Losses (from col. (h))
a				
b				
c				
d				
e				

2	Capital gain net income or (net capital loss) { If gain, also enter in Part I, line 7 / If (loss), enter -0- in Part I, line 7 }	2	
3	Net short-term capital gain or (loss) as defined in sections 1222(5) and (6). If gain, also enter in Part I, line 8, column (c) (see pages 13 and 17 of the instructions). If (loss), enter -0- in Part I, line 8	3	

Part V Qualification Under Section 4940(e) for Reduced Tax on Net Investment Income

(For optional use by domestic private foundations subject to the section 4940(a) tax on net investment income.)

If section 4940(d)(2) applies, leave this part blank.

Was the organization liable for the section 4942 tax on the distributable amount of any year in the base period? ☐ Yes ☐ No

If "Yes," the organization does not qualify under section 4940(e). Do not complete this part

1 Enter the appropriate amount in each column for each year; see page 18 of the instructions before making any entries.

(a) Base period years Calendar year (or tax year beginning in)	(b) Adjusted qualifying distributions	(c) Net value of noncharitable-use assets	(d) Distribution ratio (col. (b) divided by col. (c))
2004			
2003			
2002			
2001			
2000			

2	Total of line 1, column (d)	2	
3	Average distribution ratio for the 5-year base period—divide the total on line 2 by 5, or by the number of years the foundation has been in existence if less than 5 years	3	
4	Enter the net value of noncharitable-use assets for 2005 from Part X, line 5	4	
5	Multiply line 4 by line 3	5	
6	Enter 1% of net investment income (1% of Part I, line 27b)	6	
7	Add lines 5 and 6	7	
8	Enter qualifying distributions from Part XII, line 4	8	

If line 8 is equal to or greater than line 7, check the box in Part VI, line 1b, and complete that part using a 1% tax rate. See the Part VI instructions on page 18.

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Form 990-PF (2005) Page 4

Part VI Excise Tax Based on Investment Income (Section 4940(a), 4940(b), 4940(e), or 4948—see page 18 of the instructions)

1a Exempt operating foundations described in section 4940(d)(2), check here ▶ ☐ and enter "N/A" on line 1. Date of ruling letter: ..... (attach copy of ruling letter if necessary—see instructions)
b Domestic organizations that meet the section 4940(e) requirements in Part V, check here ▶ ☐ and enter 1% of Part I, line 27b 1
c All other domestic organizations enter 2% of line 27b Exempt foreign organizations enter 4% of Part I, line 12, col (b)
2 Tax under section 511 (domestic section 4947(a)(1) trusts and taxable foundations only. Others enter -0-) 2
3 Add lines 1 and 2 3
4 Subtitle A (income) tax (domestic section 4947(a)(1) trusts and taxable foundations only. Others enter -0-) 4
5 **Tax based on investment income.** Subtract line 4 from line 3. If zero or less, enter -0- 5
6 Credits/Payments.
a 2005 estimated tax payments and 2004 overpayment credited to 2005 — 6a
b Exempt foreign organizations—tax withheld at source — 6b
c Tax paid with application for extension of time to file (Form 8868) — 6c
d Backup withholding erroneously withheld — 6d
7 Total credits and payments. Add lines 6a through 6d 7
8 Enter any **penalty** for underpayment of estimated tax. Check here ☐ if Form 2220 is attached 8
9 **Tax due.** If the total of lines 5 and 8 is more than line 7, enter **amount owed** . . . . . ▶ 9
10 **Overpayment.** If line 7 is more than the total of lines 5 and 8, enter the amount overpaid . . . . . ▶ 10
11 Enter the amount of line 10 to be: **Credited to 2006 estimated tax** ▶ Refunded ▶ 11

Part VII-A Statements Regarding Activities

		Yes	No
1a	During the tax year, did the organization attempt to influence any national, state, or local legislation or did it participate or intervene in any political campaign?		✓
b	Did it spend more than $100 during the year (either directly or indirectly) for political purposes (see page 19 of the instructions for definition)? *If the answer is "Yes" to 1a or 1b, attach a detailed description of the activities and copies of any materials published or distributed by the organization in connection with the activities.*		✓
c	Did the organization file **Form 1120-POL** for this year?		✓
d	Enter the amount (if any) of tax on political expenditures (section 4955) imposed during the year: (1) On the organization ▶ $ _____ (2) On organization managers. ▶ $ _____		
e	Enter the reimbursement (if any) paid by the organization during the year for political expenditure tax imposed on organization managers ▶ $ _____		
2	Has the organization engaged in any activities that have not previously been reported to the IRS? *If "Yes," attach a detailed description of the activities.*		✓
3	Has the organization made any changes, not previously reported to the IRS, in its governing instrument, articles of incorporation, or bylaws, or other similar instruments? *If "Yes," attach a conformed copy of the changes*		✓
4a	Did the organization have unrelated business gross income of $1,000 or more during the year?		✓
b	If "Yes," has it filed a tax return on **Form 990-T** for this year?		✓
5	Was there a liquidation, termination, dissolution, or substantial contraction during the year? *If "Yes," attach the statement required by General Instruction T.*		✓
6	Are the requirements of section 508(e) (relating to sections 4941 through 4945) satisfied either: • By language in the governing instrument, or • By state legislation that effectively amends the governing instrument so that no mandatory directions that conflict with the state law remain in the governing instrument?		✓
7	Did the organization have at least $5,000 in assets at any time during the year? *If "Yes," complete Part II, col (c), and Part XV.*		✓
8a	Enter the states to which the foundation reports or with which it is registered (see page 19 of the instructions) ▶		
b	If the answer is "Yes" to line 7, has the organization furnished a copy of Form 990-PF to the Attorney General (or designate) of each state as required by *General Instruction G? If "No," attach explanation*		✓
9	Is the organization claiming status as a private operating foundation within the meaning of section 4942(j)(3) or 4942(j)(5) for calendar year 2005 or the taxable year beginning in 2005 (see instructions for Part XIV on page 26)? *If "Yes," complete Part XIV*		✓
10	Did any persons become substantial contributors during the tax year? *If "Yes," attach a schedule listing their names and addresses.*		✓
11	Did the organization comply with the public inspection requirements for its annual returns and exemption application?		✓

Web site address ▶
12 The books are in care of ▶ ..... Telephone no. ▶
Located at ▶ ..... ZIP+4 ▶
13 Section 4947(a)(1) nonexempt charitable trusts filing Form 990-PF in lieu of **Form 1041**—Check here . . . ▶ ☐ and enter the amount of tax-exempt interest received or accrued during the year . . . ▶ 13

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Form 990-PF (2005) Page 5

Part VII-B Statements Regarding Activities for Which Form 4720 May Be Required

File Form 4720 if any item is checked in the "Yes" column, unless an exception applies.

		Yes	No
1a	During the year did the organization (either directly or indirectly):		
	(1) Engage in the sale or exchange, or leasing of property with a disqualified person?	☐	☐
	(2) Borrow money from, lend money to, or otherwise extend credit to (or accept it from) a disqualified person?	☐	☐
	(3) Furnish goods, services, or facilities to (or accept them from) a disqualified person?	☐	☐
	(4) Pay compensation to, or pay or reimburse the expenses of, a disqualified person?	☐	☐
	(5) Transfer any income or assets to a disqualified person (or make any of either available for the benefit or use of a disqualified person)?	☐	☐
	(6) Agree to pay money or property to a government official? (Exception. Check "No" if the organization agreed to make a grant to or to employ the official for a period after termination of government service, if terminating within 90 days.)	☐	☐
b	If any answer is "Yes" to 1a(1)–(6), did any of the acts fail to qualify under the exceptions described in Regulations section 53.4941(d)-3 or in a current notice regarding disaster assistance (see page 20 of the instructions)? Organizations relying on a current notice regarding disaster assistance check here ▶ ☐	1b	X
c	Did the organization engage in a prior year in any of the acts described in 1a, other than excepted acts, that were not corrected before the first day of the tax year beginning in 2005?	1c	X
2	Taxes on failure to distribute income (section 4942) (does not apply for years the organization was a private operating foundation defined in section 4942(j)(3) or 4942(j)(5)):		
a	At the end of tax year 2005, did the organization have any undistributed income (lines 6d and 6e, Part XIII) for tax year(s) beginning before 2005? If "Yes," list the years ▶ 20....., 20...., 20...., 20.....	☐	☐
b	Are there any years listed in 2a for which the organization is not applying the provisions of section 4942(a)(2) (relating to incorrect valuation of assets) to the year's undistributed income? (If applying section 4942(a)(2) to all years listed, answer "No" and attach statement—see page 20 of the instructions.)	2b	X
c	If the provisions of section 4942(a)(2) are being applied to any of the years listed in 2a, list the years here. ▶ 20...., 20...., 20...., 20.....		
3a	Did the organization hold more than a 2% direct or indirect interest in any business enterprise at any time during the year?	☐	☐
b	If "Yes," did it have excess business holdings in 2005 as a result of (1) any purchase by the organization or disqualified persons after May 26, 1969; (2) the lapse of the 5-year period (or longer period approved by the Commissioner under section 4943(c)(7)) to dispose of holdings acquired by gift or bequest; or (3) the lapse of the 10-, 15-, or 20-year first phase holding period? *(Use Schedule C, Form 4720, to determine if the organization had excess business holdings in 2005.)*	3b	X
4a	Did the organization invest during the year any amount in a manner that would jeopardize its charitable purposes?	4a	X
b	Did the organization make any investment in a prior year (but after December 31, 1969) that could jeopardize its charitable purpose that had not been removed from jeopardy before the first day of the tax year beginning in 2005?	4b	X
5a	During the year did the organization pay or incur any amount to:		
	(1) Carry on propaganda, or otherwise attempt to influence legislation (section 4945(e))?	☐	☐
	(2) Influence the outcome of any specific public election (see section 4955); or to carry on, directly or indirectly, any voter registration drive?	☐	☐
	(3) Provide a grant to an individual for travel, study, or other similar purposes?	☐	☐
	(4) Provide a grant to an organization other than a charitable, etc., organization described in section 509(a)(1), (2), or (3), or section 4940(d)(2)?	☐	☐
	(5) Provide for any purpose other than religious, charitable, scientific, literary, or educational purposes, or for the prevention of cruelty to children or animals?	☐	☐
b	If any answer is "Yes" to 5a(1)-(5), did any of the transactions fail to qualify under the exceptions described in Regulations section 53.4945 or in a current notice regarding disaster assistance (see page 20 of the instructions)? Organizations relying on a current notice regarding disaster assistance check here ▶ ☐	5b	X
c	If the answer is "Yes" to question 5a(4), does the organization claim exemption from the tax because it maintained expenditure responsibility for the grant? *If "Yes," attach the statement required by Regulations section 53.4945-5(d).*	☐	☐
6a	Did the organization, during the year, receive any funds, directly or indirectly, to pay premiums on a personal benefit contract?	☐	☐
b	Did the organization, during the year, pay premiums, directly or indirectly, on a personal benefit contract? *If you answered "Yes" to 6b, also file Form 8870*	6b	X

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Form 990-PF (2005) Page 6

Part VIII Information About Officers, Directors, Trustees, Foundation Managers, Highly Paid Employees, and Contractors

1 List all officers, directors, trustees, foundation managers and their compensation (see page 21 of the instructions).

(a) Name and address	(b) Title, and average hours per week devoted to position	(c) Compensation (If not paid, enter -0-)	(d) Contributions to employee benefit plans and deferred compensation	(e) Expense account, other allowances

2 Compensation of five highest-paid employees (other than those included on line 1—see page 21 of the instructions). If none, enter "NONE."

(a) Name and address of each employee paid more than $50,000	(b) Title and average hours per week devoted to position	(c) Compensation	(d) Contributions to employee benefit plans and deferred compensation	(e) Expense account, other allowances
NONE				

Total number of other employees paid over $50,000 ▶ 0

3 Five highest-paid independent contractors for professional services—(see page 21 of the instructions). If none, enter "NONE."

(a) Name and address of each person paid more than $50,000	(b) Type of service	(c) Compensation
NONE		

Total number of others receiving over $50,000 for professional services ▶ 0

Part IX-A Summary of Direct Charitable Activities

List the foundation's four largest direct charitable activities during the tax year Include relevant statistical information such as the number of organizations and other beneficiaries served, conferences convened, research papers produced, etc	Expenses
1 None	
2	
3	
4	

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Part IX-B Summary of Program-Related Investments (see page 22 of the instructions) Page 7

Describe the two largest program-related investments made by the foundation during the tax year on lines 1 and 2	Amount
1	
2	
All other program-related investments See page 22 of the instructions	
3	
Total. Add lines 1 through 3 ▶	

Part X Minimum Investment Return (All domestic foundations must complete this part. Foreign foundations, see page 22 of the instructions.)

1	Fair market value of assets not used (or held for use) directly in carrying out charitable, etc., purposes:		
a	Average monthly fair market value of securities	1a	
b	Average of monthly cash balances	1b	
c	Fair market value of all other assets (see page 23 of the instructions)	1c	
d	**Total** (add lines 1a, b, and c)	1d	
e	Reduction claimed for blockage or other factors reported on lines 1a and 1c (attach detailed explanation) 1e		
2	Acquisition indebtedness applicable to line 1 assets	2	
3	Subtract line 2 from line 1d	3	
4	Cash deemed held for charitable activities. Enter 1½% of line 3 (for greater amount, see page 23 of the instructions)	4	
5	**Net value of noncharitable-use assets.** Subtract line 4 from line 3. Enter here and on Part V, line 4	5	
6	**Minimum investment return.** Enter 5% of line 5	6	

Part XI Distributable Amount (see page 23 of the instructions) (Section 4942(j)(3) and (j)(5) private operating foundations and certain foreign organizations check here ▶ ☐ and do not complete this part.)

1	Minimum investment return from Part X, line 6			1	
2a	Tax on investment income for 2005 from Part VI, line 5	2a			
b	Income tax for 2005. (This does not include the tax from Part VI.)	2b			
c	Add lines 2a and 2b			2c	
3	Distributable amount before adjustments Subtract line 2c from line 1			3	
4	Recoveries of amounts treated as qualifying distributions			4	
5	Add lines 3 and 4			5	
6	Deduction from distributable amount (see page 24 of the instructions)			6	
7	**Distributable amount** as adjusted. Subtract line 6 from line 5. Enter here and on Part XIII, line 1			7	

Part XII Qualifying Distributions (see page 24 of the instructions)

1	Amounts paid (including administrative expenses) to accomplish charitable, etc., purposes:		
a	Expenses, contributions, gifts, etc.—total from Part I, column (d), line 26	1a	
b	Program-related investments—total from Part IX-B	1b	
2	Amounts paid to acquire assets used (or held for use) directly in carrying out charitable, etc., purposes	2	
3	Amounts set aside for specific charitable projects that satisfy the:		
a	Suitability test (prior IRS approval required)	3a	
b	Cash distribution test (attach the required schedule)	3b	
4	**Qualifying distributions.** Add lines 1a through 3b. Enter here and on Part V, line 8, and Part XIII, line 4	4	
5	Organizations that qualify under section 4940(e) for the reduced rate of tax on net investment income. Enter 1% of Part I, line 27b (see page 24 of the instructions)	5	
6	**Adjusted qualifying distributions.** Subtract line 5 from line 4	6	

Note: *The amount on line 6 will be used in Part V, column (b), in subsequent years when calculating whether the foundation qualifies for the section 4940(e) reduction of tax in those years.*

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Part XIII Undistributed Income (see page 24 of the instructions)

	(a) Corpus	(b) Years prior to 2004	(c) 2004	(d) 2005
1 Distributable amount for 2005 from Part XI, line 7				
2 Undistributed income, if any, as of the end of 2004:				
a Enter amount for 2004 only				
b Total for prior years: 20____,20____,20____				
3 Excess distributions carryover, if any, to 2005.				
a From 2000				
b From 2001				
c From 2002				
d From 2003				
e From 2004				
f **Total** of lines 3a through e				
4 Qualifying distributions for 2005 from Part XII, line 4: ▶ $ _____				
a Applied to 2004, but not more than line 2a				
b Applied to undistributed income of prior years (Election required—see page 25 of the instructions)				
c Treated as distributions out of corpus (Election required—see page 25 of the instructions)				
d Applied to 2005 distributable amount				
e Remaining amount distributed out of corpus				
5 Excess distributions carryover applied to 2005 *(If an amount appears in column (d), the same amount must be shown in column (a).)*				
6 Enter **the net total of each column as indicated below:**				
a Corpus. Add lines 3f, 4c, and 4e Subtract line 5				
b Prior years' undistributed income. Subtract line 4b from line 2b				
c Enter the amount of prior years' undistributed income for which a notice of deficiency has been issued, or on which the section 4942(a) tax has been previously assessed				
d Subtract line 6c from line 6b. Taxable amount—see page 25 of the instructions				
e Undistributed income for 2004. Subtract line 4a from line 2a. Taxable amount—see page 25 of the instructions				
f Undistributed income for 2005. Subtract lines 4d and 5 from line 1. This amount must be distributed in 2006				
7 Amounts treated as distributions out of corpus to satisfy requirements imposed by section 170(b)(1)(E) or 4942(g)(3) (see page 25 of the instructions)				
8 Excess distributions carryover from 2000 not applied on line 5 or line 7 (see page 25 of the instructions)				
9 **Excess distributions carryover to 2006.** Subtract lines 7 and 8 from line 6a				
10 Analysis of line 9:				
a Excess from 2001				
b Excess from 2002				
c Excess from 2003				
d Excess from 2004				
e Excess from 2005				

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Part XIV Private Operating Foundations (see page 26 of the instructions and Part VII-A, question 9)

1a If the foundation has received a ruling or determination letter that it is a private operating foundation, and the ruling is effective for 2005, enter the date of the ruling . . . . ▶

b Check box to indicate whether the organization is a private operating foundation described in section ☐ 4942(j)(3) or ☐ 4942(j)(5)

	Tax year	Prior 3 years			
	(a) 2005	(b) 2004	(c) 2003	(d) 2002	(e) Total
2a Enter the lesser of the adjusted net income from Part I or the minimum investment return from Part X for each year listed					
b 85% of line 2a					
c Qualifying distributions from Part XII, line 4 for each year listed					
d Amounts included in line 2c not used directly for active conduct of exempt activities					
e Qualifying distributions made directly for active conduct of exempt activities Subtract line 2d from line 2c					
3 Complete 3a, b, or c for the alternative test relied upon.					
a "Assets" alternative test—enter: (1) Value of all assets					
(2) Value of assets qualifying under section 4942(j)(3)(B)(i)					
b "Endowment" alternative test—enter ⅔ of minimum investment return shown in Part X, line 6 for each year listed					
c "Support" alternative test—enter: (1) Total support other than gross investment income (interest, dividends, rents, payments on securities loans (section 512(a)(5)), or royalties)					
(2) Support from general public and 5 or more exempt organizations as provided in section 4942(j)(3)(B)(iii)					
(3) Largest amount of support from an exempt organization					
(4) Gross investment income					

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Part XV Supplementary Information (Complete this part only if the organization had $5,000 or more in assets at any time during the year—see page 26 of the instructions.)

1 **Information Regarding Foundation Managers:**

a List any managers of the foundation who have contributed more than 2% of the total contributions received by the foundation before the close of any tax year (but only if they have contributed more than $5,000). (See section 507(d)(2).)

b List any managers of the foundation who own 10% or more of the stock of a corporation (or an equally large portion of the ownership of a partnership or other entity) of which the foundation has a 10% or greater interest.

2 **Information Regarding Contribution, Grant, Gift, Loan, Scholarship, etc., Programs:**

Check here ▶ ☐ if the organization only makes contributions to preselected charitable organizations and does not accept unsolicited requests for funds. If the organization makes gifts, grants, etc. (see page 26 of the instructions) to individuals or organizations under other conditions, complete items 2a, b, c, and d.

a The name, address, and telephone number of the person to whom applications should be addressed:

b The form in which applications should be submitted and information and materials they should include:

c Any submission deadlines:

d Any restrictions or limitations on awards, such as by geographical areas, charitable fields, kinds of institutions, or other factors:

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Form 990-PF (2005) Page 10

Part XV Supplementary Information (continued)

3 Grants and Contributions Paid During the Year or Approved for Future Payment

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
a *Paid during the year*				
Total ▶ 3a				
b *Approved for future payment*				
Total ▶ 3b				

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Form 990-PF (2005)

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Form 990-PF (2005)

Part XVI-A Analysis of Income-Producing Activities

Enter gross amounts unless otherwise indicated	Unrelated business income		Excluded by section 512, 513, or 514		(e)
	(a) Business code	(b) Amount	(c) Exclusion code	(d) Amount	Related or exempt function income (See page 26 of the instructions)
1 Program service revenue:					
a					
b					
c					
d					
e					
f					
g Fees and contracts from government agencies					
2 Membership dues and assessments					
3 Interest on savings and temporary cash investments					
4 Dividends and interest from securities					
5 Net rental income or (loss) from real estate:					
a Debt-financed property					
b Not debt-financed property					
6 Net rental income or (loss) from personal property					
7 Other investment income					
8 Gain or (loss) from sales of assets other than inventory					
9 Net income or (loss) from special events					
10 Gross profit or (loss) from sales of inventory					
11 Other revenue: a					
b					
c					
d					
e					
12 Subtotal. Add columns (b), (d), and (e)					
13 Total. Add line 12, columns (b), (d), and (e) (See worksheet in line 13 instructions on page 27 to verify calculations.)					13

Part XVI-B Relationship of Activities to the Accomplishment of Exempt Purposes

Line No. ▼	Explain below how each activity for which income is reported in column (e) of Part XVI-A contributed importantly to the accomplishment of the organization's exempt purposes (other than by providing funds for such purposes). (See page 27 of the instructions.)

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Form 990-PF (2005) Page 12

Part XVII Information Regarding Transfers To and Transactions and Relationships With Noncharitable Exempt Organizations

		Yes	No
1	Did the organization directly or indirectly engage in any of the following with any other organization described in section 501(c) of the Code (other than section 501(c)(3) organizations) or in section 527, relating to political organizations?		
a	Transfers from the reporting organization to a noncharitable exempt organization of:		
	(1) Cash	1a(1)	
	(2) Other assets	1a(2)	
b	Other transactions:		
	(1) Sales of assets to a noncharitable exempt organization	1b(1)	
	(2) Purchases of assets from a noncharitable exempt organization	1b(2)	
	(3) Rental of facilities, equipment, or other assets	1b(3)	
	(4) Reimbursement arrangements	1b(4)	
	(5) Loans or loan guarantees	1b(5)	
	(6) Performance of services or membership or fundraising solicitations	1b(6)	
c	Sharing of facilities, equipment, mailing lists, other assets, or paid employees	1c	

d If the answer to any of the above is "Yes," complete the following schedule. Column (b) should always show the fair market value of the goods, other assets, or services given by the reporting organization. If the organization received less than fair market value in any transaction or sharing arrangement, show in column (d) the value of the goods, other assets, or services received.

(a) Line no	(b) Amount involved	(c) Name of noncharitable exempt organization	(d) Description of transfers, transactions, and sharing arrangements

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2a Is the organization directly or indirectly affiliated with, or related to, one or more tax-exempt organizations described in section 501(c) of the Code (other than section 501(c)(3)) or in section 527? ☐ Yes ☐ No

b If "Yes," complete the following schedule.

(a) Name of organization	(b) Type of organization	(c) Description of relationship

Sign Here

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than taxpayer or fiduciary) is based on all information of which preparer has any knowledge

Signature of officer or trustee — Date 8/10/07 — Title Chairman

Paid Preparer's Use Only

Preparer's signature — Date 8/10/07 — Check if self-employed ☐ — Preparer's SSN or PTIN (See Signature on page 28 of the instructions)

Firm's name (or yours if self-employed), address, and ZIP code: RAB Accounting Services, 515 Neptune Ave 19B, Brklyn NY 11224 — EIN ► 11-3598966 — Phone no ( )

Form 990-PF (2005)

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Internal Revenue Service
United States Department of the Treasury

Search for Charities, Online Version of Publication 78 Search Results

◯ Organization

Name Includes Carib Charities ○ At least one of the words ● All of the words

◯ Location

City State All... Country USA

◯ Deductibility Code

Deductibility Code All...

Search | Begin New Search Search Tips

Show 25 | OK « Prev | 1-1 | Next »

Name ▲	City	State	Country	Code
Carib News Charities Inc.	New York	NY	USA	4

« Prev | 1-1 | Next »

Internal Revenue Service
United States Department of the Treasury

Deductibility Code

Publication 78 uses a coding system to identify each organization listed by type and limitation on deductibility of charitable contributions to the organization. The code(s) displayed depend(s) on the code for which the organization qualifies. In cases where an organization has multiple deductibility codes, only the definition for each applicable deductibility code is displayed.

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

Close

EXHIBIT 9

CONFIDENTIAL

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

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re:	Representative of IBM, Vice President Market Development, IBM
Review #:	09-2567; 09-4403; 09-3698; 09-6333; 09-2222
Date:	May 8, 2009
Location:	IBM Offices, Washington, D.C.
Participants:	Leo Wise
	Beth Horton
	Lisa Palluconi, Counsel for Government Programs for IBM
	Adrienne G. Rhone, Director Governmental Programs

Summary: The Representative of IBM is the Vice President of Market Development for IBM. She was interviewed pursuant to Reviews 09-2567; 09-4403; 09-3698; 09-6333; and 09-2222. The Representative of IBM helped arrange IBM's participation at the 13th Annual Caribbean Multinational Business Conference in 2008; she also participated at the event. The OCE requested an interview with the Representative of IBM and she consented to an interview. The Representative of IBM was given an 18 U.S.C. § 1001 warning and she signed a written acknowledgement of the warning. The Representative of IBM made the following statements in response to our questioning:

1. She attended the 13th Annual Caribbean Multinational Business Conference in 2008.
2. 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.
3. 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.
4. IBM was an entry level sponsor in '05.

5. She dealt with Faye Rodney on conference matters.
6. 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.
7. IBM participated at the ’05, ’06, ’07 and ’08 conference.
8. 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.
9. 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.
10. The letter is the first communication regarding the conference.
11. 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.
12. She also agreed to moderate the women’s breakfast sponsored by Macy’s.
13. The team manager would have worked with the Rodneys regarding the break-out sessions.
14. IBM controlled its own content for the session(s).
15. 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.
16. IBM has a methodical way of approving conference sponsorships. The letter from the Rodneys was received in July.
17. She approved the check for the purchase order and released the check. Carib would have received the check in August or September.
18. After the check is released, she and the business partner collaborate on the content of session.
19. She and the business partner attended the conference.
20. She has only seen the Rodneys at the conference. She has been invited to other events but has not accepted the invitations.

21. She received a call from Mr. Rodney about the article on the conference.

22. She had no knowledge of the Foundation until this matter.

23. She understood Carib News to be the sponsor.

24. 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.

25. 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.

26. The only parameters placed on the money for the conference was with respect to time slots and length of the sessions.

27. She tells her team her preferences and the team works out the specifics with Carib.

28. She does not recall seeing a specific document that listed the various levels of sponsorship.

29. 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.

30. 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.

31. She noticed names of entities on the agenda from the web that she knew were not at the conference.

32. 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.

33. 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.

34. 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.

35. 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.

36. The off-sight event was held at a separate hotel, it included local talent and a comedienne.

37. She stated that Members did not attend the breakout sessions.

38. She had a conversation with Rep. Thompson regarding the election.

39. She left the conference on Sunday morning by 7:00am.

40. She spoke with her team after the article regarding the conference came out.

41. 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.

42. 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.

43. 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.

44. Her registration fee was part of the sponsorship. She paid for her room and all travel costs.

45. There were less that 300 people at the conference.

46. When she registered for the conference, she received a badge that allowed access to buffets during the meetings.

47. The registration fee for the conference in ’05 was $750.00.

48. She was not aware of the ’08 registration fee.

Beth Horton
Investigative Counsel

EXHIBIT 10

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

Verizon Foundation
One Verizon Way
Bldg 6, 3rd Flr South
Basking Ridge, NJ 07920

November 25, 2008

Mr. Karl B. Rodney
Chairman & CEO
Carib News Charities, Inc.
7 West 36th Street, 8th Floor
New York, NY 10018

Dear Mr. Rodney:

On behalf of the Verizon Foundation, it is a pleasure to present the enclosed check for $35,000.00 to Carib News Charities, Inc. in support of the 13th Annual Carib News Multi-National Business Conference – November 6-9, 2008.

Under the Omnibus Budget Reconciliation Act of 1993, Verizon Communications must receive a written receipt from all organizations to which it makes a charitable contribution. Therefore, please complete and return the enclosed form acknowledging this gift within two weeks of receipt.

Verizon Foundation is delighted to support Carib News Charities, Inc. and we wish to thank you and the organization for your dedication and contribution to our communities.

Please recognize our contribution as coming from "Verizon Communications."

Sincerely,

SS/ah

Enclosures

cc: Patrick Gaston
Albert Browne

INVOICE NUMBER	INVOICE DATE	DESCRIPTION	GROSS	DISCOUNT	NET AMOUNT
00394421-00003064	11/17/2008	005-13TH ANNUAL MULTI-NATIONAL	35,000.00		35,000.00

Check No.	Check Date	Vendor No.	Handling Code				
0002756	11/21/2008	0000011038	FN	Total	$35,000.00	0.00	$35,000.00

PAGE 1 of 1

Questions? Call 916/357-3270 BU APCRP

FOLD ALONG PERFORATED DOTTED LINE & REMOVE CHECK

THIS DOCUMENT CONTAINS MULTIPLE FRAUD DETERRENT SECURITY FEATURES - SEE REVERSE

verizon
P.O. Box 2200
Folsom, CA 95763-2200
916/357-3270

Wachovia Bank, National Association
Chapel Hill, NC 27514

Date 11/21/2008

0002756

56-156
531

Thirty five thousand and 00/100 Dollars

PAY CARIB NEWS CHARITIES, INC.
7 WEST 36TH STREET, 8TH FLR.
NEW YORK, New York 10018

$ $35,000.00

Catherine I. Webster

VOID SIX MONTHS AFTER ISSUE DATE

Security Features Included. Details on back.

[redacted]

SEE REVERSE SIDE FOR OPENING INSTRUCTIONS

verizon
P.O. Box 2200
Folsom, CA 95763-2200

PRESORTED
FIRST-CLASS MAIL
U.S. POSTAGE PAID
SACRAMENTO, CA
PERMIT NO. 98

CARIB NEWS CHARITIES, INC.
7 WEST 36TH STREET, 8TH FLR.
NEW YORK, New York 10018

Acknowledgment of Charitable Contribution

IMPORTANT: Please acknowledge the enclosed charitable contribution by completing and returning this form. Donors cannot deduct contributions unless they are acknowledged in this manner and a failure to return this form in a timely manner may make you ineligible for future contributions by Verizon Foundation.

1. I hereby acknowledge the Verizon Foundation 2008 contribution of:

$35,000.00

for 13th Annual Multi-National Business Conference - November 6-9, 2008.

(or describe property or services other than money received)

Received on (date): **Date of check:** 11/21/08

2. Please indicate whether or not any goods or services were provided by your organization in consideration for this contribution (e.g., the value of food, beverage, ticket or entertainment at a fundraising event):

_____ **Yes** _____**No**

If **YES**, please describe what was provided and give a good faith estimate of the value to the goods or services, understanding that the amount of the contribution that is deductible as a charitable contribution is limited to the excess of money and the value of property contributed over the value of the goods and services provided by the charity.

Description: **Est. Value: $**

3. The information above is provided for the purpose of complying with IRS reporting requirements and is accurate to the best of my knowledge. I understand that penalties may be imposed by the IRS on charities that fail to make the required disclosure or for making a disclosure that is inaccurate or incomplete.

Name:

Title:

Organization: Carib News Charities, Inc.

Organization Tax I.D.#: 133632050vz

Signature: **Date:**

Please return to:

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

Telephone: 908-559-[redacted]
Fax: 908-630-2660

Acknowledgment of Charitable Contribution

IMPORTANT: Please acknowledge the enclosed charitable contribution by completing and returning this form. Donors cannot deduct contributions unless they are acknowledged in this manner and a failure to return this form in a timely manner may make you ineligible for future contributions by Verizon Foundation.

1. I hereby acknowledge the Verizon Foundation 2008 contribution of:
$35,000.00
for 13th Annual Multi-National Business Conference - November 6-9, 2008.

(or describe property or services other than money received)

Received on (date): 11/26/08 **Date of check:** 11/21/08

2. Please indicate whether or not any goods or services were provided by your organization in consideration for this contribution (e.g., the value of food, beverage, ticket or entertainment at a fundraising event):
____✓____ **Yes** _____ **No**

If **YES**, please describe what was provided and give a good faith estimate of the value to the goods or services, understanding that the amount of the contribution that is deductible as a charitable contribution is limited to the excess of money and the value of property contributed over the value of the goods and services provided by the charity.

Description: Registration + Conference Meal Plan **Est. Value:** $ 1300.00

3. The information above is provided for the purpose of complying with IRS reporting requirements and is accurate to the best of my knowledge. I understand that penalties may be imposed by the IRS on charities that fail to make the required disclosure or for making a disclosure that is inaccurate or incomplete.

Name: KARL B. RODNEY
Title: PUBLISHER/CEO
Organization: Carib News Charities, Inc.
Organization Tax I.D.#: 133632650vz
Signature: [signature] **Date:** 12/3/08
Please return to:

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

Telephone: 908-559-[redacted]
Fax: 908-630-2660

EXHIBIT 11

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 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 was given an 18 U.S.C. § 1001 warning, signed a written acknowledgement of the warning. Representative 1 of the Verizon Foundation made the following statements in response to our questioning:

1. Representative 1 of the Verizon Foundation is currently the President of the Verizon Foundation ("the Foundation") and Strategic Director for Philanthropy. His duties 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.

2. 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."

3. 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.

4. Representative 1 of the Verizon Foundation and Mr. Rodney are both members of the board of the Foundation for the University of the West Indies. The two men interacted at board meetings four times per year. Representative 1 of the Verizon Foundation stated that he may also have spoken to Mr. Rodney 1-2 other times prior to the Conference regarding how the Foundation could showcase its Thinkfinity program. He also stated that he may have spoken to Mr. Rodney once after receiving his letter of invitation for the Conference. He does not recall Mr. Rodney "pitching" the conference to him. Representative 1 of the Verizon Foundation stated that the Foundation would not have participated at the Conference unless he could speak on educational issues. Representative 1 of the Verizon Foundation believed the Conference would be a good opportunity to showcase the Foundation's Thinkfinity program.

5. 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 he had spoken with Mr. Rodney regarding the Thinkfinity program, he did not make any type of informal commitment to fund the Conference.

6. 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.

7. 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.

8. 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.

9. Representative 1 of the Verizon Foundation arrived at the Conference on Thursday afternoon and departed on Saturday morning. Representative 1 of the Verizon Foundation stated that he went to make his speech and promptly left the event. Representative 1 of the Verizon Foundation spoke 3 times on Friday; he was acknowledge at the welcome event on Friday morning and he participated in a demonstration on Thinkfinity in the afternoon. It is not clear from Representative 1 of the Verizon Foundation's remarks what other time he spoke at the Conference. He was invited to speak on Saturday but he did not feel that an extra day was necessary.

10. 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 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.

11. 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.

12. 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.

13. Representative 1 of the Verizon Foundation spoke with Mr. Rodney prior to the Conference to cancel the programs he was slated to speak at on Saturday (this was his 3rd call regarding the Conference – 1st call was regarding invitation, 2nd call was to discuss his participation, 3rd was to cancel Saturday programs). Mr. Rodney was receptive to Representative 1 of the Verizon Foundation's request and the Saturday program was cancelled.

14. 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 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.

15. 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.

16. 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

EXHIBIT 12

CONFIDENTIAL

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

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re:	Representative 2 of the Verizon Foundation
Review #:	09-2567; 09-4403; 09-3698; 09-6333; 09-2222
Date:	March 23, 2009
Location:	Verizon Offices, Washington, DC
Participants:	Leo Wise
	Omar Ashmawy
	Beth Horton
	David Kass, Assistant General Counsel Compliance
	James C. Wilson, Vice President and Associate General Counsel Compliance

Summary: Representative 2 of the Verizon Foundation is the National Program Director for the Verizon Foundation and Vice President for Education & Technology for Verizon. He was interviewed pursuant to Reviews 09-2567; 09-4403; 09-3698; 09-6333; and 09-2222. Representative 2 of the Verizon Foundation helped arrange the Verizon Foundation's participation at the 13th Annual Caribbean Multinational Business Conference in 2008; he also accompanied Representative 1 of the Verizon Foundation to the event. The OCE requested an interview with Representative 2 of the Verizon Foundation and he consented to an interview. Representative 2 of the Verizon Foundation was given an 18 U.S.C. § 1001 warning, signed a written acknowledgement of the warning. Representative 2 of the Verizon Foundation made the following statements in response to our questioning:

1. 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.

2. 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.

3. 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.

4. 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.

5. 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.

6. 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.

7. Representative 2 of the Verizon Foundation will have been with the Foundation 3 years in October.

8. 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.

9. 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.

10. 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.

11. 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.

12. 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.

13. 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.

14. 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.

15. 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.

16. 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.

17. 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.

18. 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.

19. 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.

20. 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.

21. Representative 2 of the Verizon Foundation worked on the conference before Carib submitted application for funding which he stated was not unusual.

22. 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.

23. 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.

24. 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.

25. Representative 2 of the Verizon Foundation prepared 2 versions of the Foundation's role at the conference.

26. 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.

27. 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.

28. Town Hall event was Mr. Rodney's idea.

29. 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.

30. 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.

31. 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.

32. 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.

33. Representative 2 of the Verizon Foundation did not recall seeing the name Carib News Charities Inc.

34. 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.

35. Kathy Browne, Senior VP for Corporate Responsibility would have approved the grant.

36. 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.

37. 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.

38. Mr. Rodney arranged these meetings, the webcast did not take place.

39. 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.

40. 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.

41. 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.

42. There was no discussion regarding scheduling sessions to benefit US companies.

43. Representative 2 of the Verizon Foundation stated that he did not have any contact with Members of Congress other than a possible introductory handshake.

44. 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.

45. 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.

46. Representative 2 of the Verizon Foundation believes that he may have received a thank you letter from Mr. Rodney for participating at the conference.

47. He did not see the contribution-sponsorship letter.

48. 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.

49. 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

EXHIBIT 13

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

(3)

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

Because we know of your busy schedule, I will also follow up with your office to ascertain interest level.

Thanks for your kind consideration.

Best regards,

Faye A. Rodney
President

Karl B. Rodney
Publisher/CEO

(4)

Mar 10 09 04:39p W.L. McKenzie 770-971-[redacted] p.6

CARIB NEWS INC.

7 WEST 36TH STREET
8TH FLOOR
NEW YORK, 10018
212-944-[redacted]

Invoice

Date	Invoice #
7/16/2008	45122

Bill To
Wanda McKenzie IBM 2607 Jesters Court Marietta, GA 30068

Description	Amount
Sponsorship Multi-National Business Conference 2008 TAX ID 13-362060	20,000.00
Total	$20,000.00

09-2222_142

Mar 10 09 04:39p W.L. McKenzie 770-971-8565 p.7
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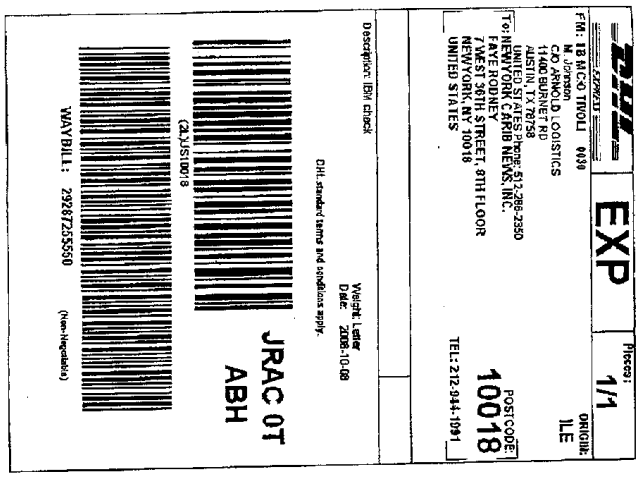

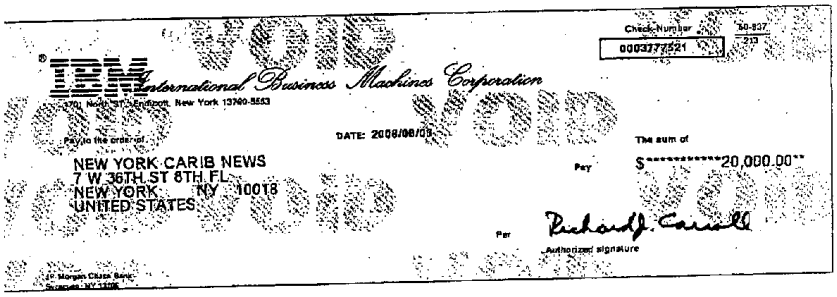

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09-2222_143

EXHIBIT 14

May 15, 2009

MEMORANDUM VIA FAX TO: 202-226-0997

TO: Omar Ashmawy
FROM: Will Ris

RE: Materials related to Carib News Foundation Conference

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

1. The original letter of request for support from Carib News Foundation sent to American Airlines. I assume that they sent the identical letter to other airlines because in paragraph 3, they refer to "Continental" when it should be "American". In any case, they requested a total of 95 tickets for this event. We responded orally and told them the maximum we could provide would be 10.

2. A listing of the10 tickets that we provided. If you need more detailed records of each individual ticket, I am happy to provide it. But this shows the names and itineraries of all 10 travelers. We provided no other support for the conference except that our group sales office authorized a standard 5 percent discount on tickets for those travelling to the conference - - this is universally available to any group of 10 or more travelling to the same location.

If there is anything else I can help you with, please let me know.

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

June 6, 2008

(10 First)

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 Caribbean Region, it is going to be one of the Agenda items in the travel & Tourism sector. Continental's success is vital to the Caribbean region and the US role in world travel; we would expect significant input into any initiatives discussed.

We expect to have elected officials of the US and the Caribbean, Civic Leaders and Business- persons who can influence policies and encourage worthwhile initiatives to be at the Conference. We would welcome American Airlines' participation.

The Host Committee in the Caribbean Region and the Planning Committee in the US have all agreed to honor you with the Conference's prestigious ***Marcus Garvey Bridge Builders Award.*** Should you agree to accept, we would ask Congressman Charles Rangel and Congresswoman Eddie Bernice Johnson to make the presentation to you.

We are open to our customary barter of tickets for sponsorship levels, and have enclosed a proposed arrangement guide similar to last year.

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: [redacted]@nycaribnews.com or (212) 944-[redacted].

Because we know of your busy schedule, I will also follow up with your office to ascertain interest level.

Thanks for your kind consideration.

Best regards,

Faye A. Rodney
President

Karl B. Rodney
Publisher/CEO

We are expecting about 20 Members of Congress or more who will be attending along with other Civic Leaders and VIP's. Again, we will position American Airlines as one of the main carriers to the Caribbean transporting the elected officials and celebrities. To help us move the process along we would like to propose the following, that American Airlines participate as a Gold Sponsor of the conference in consideration for which American Airlines would receive the following:

- American Airlines will be recognized as a main sponsor.
- American Airlines name and logo will be included on all printed material.
- American Airlines will be included in all radio and television promotions.
- American Airlines will be in all Internet promotions.
- American Airlines will be a **designated sponsor** of a main event and/or a workshop with speaking opportunities.
- American Airlines will receive prominent space for display or exhibition.
- American Airlines banners will be displayed in the main conference area
- American Airlines can develop specific promotional materials.

In return for the above, American Airlines will provide *Carib News* with:

- **Maximum of fifty (50) roundtrip coach class tickets** from the 48 contiguous United States to Antigua. Reservations to be done by ***Carib News*** and ticketing to be by American Airlines.

- **Maximum of thirty-five (35) first-class roundtrip tickets** from the 48 contiguous United States to Antigua.

- **Maximum of five (5) coach class tickets and five (5) first class tickets** to be used for site inspection and conference planning prior to the conference.

- American Airlines will provide group fares for registered attendees. Fare and reservations & ticketing to be negotiated by American Airlines.

Site Inspection is part of the sponsorship package. We do plan to do site inspections in St. Maarten when we will officially announce the Conference and work out broad issues.

205

CARIBNEWS SXM CONFERENCE 2008

Organization Name	Booking Code	Destination	TktDesig	Event Name	Authorizer	STA	BRA	Letter Nbr	Expiration Date	RefNbr	Routing	PNR	Traveler Name
GOVERNMENT AFFAIRS	Z	NAM	PRONAM	CaribNews SXM Conference 2008	50348	3237	1141	388125	16-Jun-09	525150	JFK-SXM-JFK	LUUKDQ	RODNEY/K
GOVERNMENT AFFAIRS	Z	NAM	PRONAM	CaribNews SXM Conference 2008	50348	3237	1141	388126	16-Jun-09	525150	JFK-SXM-JFK	LUUKDQ	RODNEY/F
GOVERNMENT AFFAIRS	Z	NAM	PRONAM	CaribNews SXM Conference 2008	50348	3237	1141	388127	16-Jun-09	525150	JFK-SXM	DTXUGB	TAYLOR/S
GOVERNMENT AFFAIRS	Z	NAM	PRONAM	CaribNews SXM Conference 2008	50348	3237	1141	388128	16-Jun-09	525150	JFK-SXM	DTXUGB	BURNS/K
GOVERNMENT AFFAIRS	Z	NAM	PRONAM	CaribNews SXM Conference 2008	50348	3237	1141	388129	16-Jun-09	525150	JFK-SXM-SJU-JFK	PMJWAX	EVE/E
GOVERNMENT AFFAIRS	Z	NAM	PRONAM	CaribNews SXM Conference 2008	50348	3237	1141	388130	16-Jun-09	525150	JFK-SXM-SJU-JFK	PMJWAX	EVE/F
GOVERNMENT AFFAIRS	Z	NAM	PRONAM	CaribNews SXM Conference 2008	50348	3237	1141	388131	16-Jun-09	525150	JFK-SXM-JFK	IKZVDM	DINKINS/D

Organization Name	Booking Code	Destination	TktDesig	Event Name	Authorizer	STA	BRA	Letter Nbr	Expiration Date	RefNbr	Routing	PNR	Traveler Name
GOVERNMENT AFFAIRS	T	NAM	PRONAM	CaribNews SXM Conference 2008	50348	3237	1141	412645	28-Aug-09	538511	JFK-SJU-SXM-JFK	LVAFTT	WILLIAMS/J
GOVERNMENT AFFAIRS	T	NAM	PRONAM	CaribNews SXM Conference 2008	50348	3237	1141	412647	28-Aug-09	538511	DCA-MIA-SXM-MIA-DCA	CMPWAZ	SIMMONS/C
GOVERNMENT AFFAIRS	T	NAM	PRONAM	CaribNews SXM Conference 2008	50348	3237	1141	412648	28-Aug-09	538511	JFK-SJU-SXM-JFK	HBQAVW	DODSON/H

EXHIBIT 15

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311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2006	Year-End	Caine, Christopher
311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2006	Year-End	Caine, Christopher
311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2006	Year-End	Caine, Christopher
311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2007	Mid-Year	Caine, Christopher
311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION	INTERNATIONAL BUSINESS MACHINES CORPORATION	2007	Year-End	Caine, Christopher

	(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
311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2008	4th Quarter	Caine, Christopher
311230000	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	INTERNATIONAL BUSINESS MACHINES CORPORATION (IBM)	2009	1st Quarter	Edington, PJ
311230000	International Business Machines Corporation (IBM)	International Business Machines Corporation (IBM)	2005	Year-End	Caine, Christopher
401290000	QA Internal Test - New Database IBM	QA Internal Test - New Database IBM	2008	1st Quarter	None
401290000	QA Internal Test - New Database IBM	QA Internal Test - New Database IBM	2008		Last Name 01, First Name 01
401290000	QA Internal Test - New Database IBM	QA Internal Test - New Database IBM	2008	3rd Quarter	None

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310520000	CITIGROUP, INC	CITIGROUP, INC	2006	Year-End	Burgeson, Christine
310520000	CITIGROUP, INC	CITIGROUP, INC	2007	Mid-Year	Burgeson, Christine
310520000	CITIGROUP, INC	CITIGROUP, INC	2007	Year-End	Burgeson, Christine
310520000	CITIGROUP, INC	CITIGROUP, INC	2007	Year-End	Burgeson, Christine
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2007	Mid-Year	None
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2007	Year-End	None
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2008	1st Quarter	None
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2008	2nd Quarter	None
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2008	3rd Quarter	None
355240000	CITIZENS COAL COUNCIL	CITIZENS COAL COUNCIL	2008	4th Quarter	None
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2006	Year-End	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2007	Mid-Year	Snyder, John

316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2007	Year-End	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2008	1st Quarter	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2008	2nd Quarter	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2008	3rd Quarter	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2008	4th Quarter	Snyder, John
316720000	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	CITIZENS COMMITTEE FOR THE RIGHT TO KEEP AND BEAR ARMS	2009	1st Quarter	Snyder, John
373770000	CITIZENS FINANCIAL GROUP, INC.	CITIZENS FINANCIAL GROUP, INC.	2007	Mid-Year	Robinson, Ken
373770000	CITIZENS FINANCIAL GROUP, INC.	CITIZENS FINANCIAL GROUP, INC.	2007	Year-End	Robinson, Kenneth

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315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2006	Year-End	Davidson, Peter B.
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2007	Mid-Year	Davidson, Peter B.
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2007	Year-End	Davidson, Peter
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2008	1st Quarter	Davidson, Peter
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2008	2nd Quarter	Cantrel, Frank
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2008	3rd Quarter	Cantrel, Frank
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2008	4th Quarter	Davidson, Peter
315720000	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	VERIZON & ITS AFFILIATES, EXCEPT VERIZON WIRELESS	2009	1st Quarter	Cantrel, Frank
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2006	Year-End	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2007	Mid-Year	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2007	Year-End	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2008	1st	

				Quarter	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2008	2nd Quarter	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2008	3rd Quarter	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2008	4th Quarter	Brittingham, Donald
352050000	VERIZON WIRELESS	VERIZON WIRELESS	2009	1st Quarter	Brittingham, Donald
315720000	Verizon & its affiliates, except Verizon Wireless	Verizon & its affiliates, except Verizon Wireless	2005	Year-End	Davidson, Peter
315720000	Verizon & its affiliates, except Verizon Wireless	Verizon & its affiliates, except Verizon Wireless	2006	Mid-Year	Davidson, Peter
352050000	Verizon Wireless	Verizon Wireless	2005	Year-End	Azare, Monica
352050000	Verizon Wireless	Verizon Wireless	2006	Mid-Year	Azare, Monica

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EXHIBIT 16

DOING BUSINESS TOGETHER
CARIBNEWS

BASIC REQUIREMENTS
TO HOST
CARIBBEAN MULTI-NATIONAL BUSINESS CONFERENCE

- Invitation to host conference to be issued by Prime Minister (Head of Government). This is to facilitate the attendance of several elected officials from the United States, United Kingdom and other countries.
- Prime Minister to be keynote speaker at one of the major events of the conference and 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 –
    - The Opening Ceremonies
    - The Reception
    - The Gala Dinner
- To assist in Promotion and Publicity of the conference both locally and through international offices and official publications.
- Assist in securing competitive hotel rates.
- Equip and staff conference secretariat.
- Prime Minister to issue invitations along with CARIB NEWS to members of the US Congress, other Prime Ministers and Ministers of Government.
- Participate in the Forum with Members of Congress.
- Arrange tours and activities of interest for VIP's and/or their spouse.

THE NEW YORK
CARIBNEWS
THE WEEKLY VOICE OF THE CARIBBEAN-AMERICAN COMMUNITY
7 WEST 36TH STREET, NEW YORK, NY 10018 (212) 944[redacted]

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 for each area.

We need to know immediately who on the Host Committee will be handling press and publicity, we can start sending Press Releases and Press updates.

We will be sending regular updates.

Kindest Regards

Karl B. Rodney
Publisher/CEO

c.c. Commissioner Roy Marlin
Director of Tourism, Regina LaBega
Marla Chemont

Taking Our Rightful Place In The Sun

Carib News Foundation
7 West 36th Street, 8th floor, New York NY 10017
Tel: (212) 944[redacted] Fax: (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.

2008 CARIBBEN MULTI-NATIONAL BUSINESS CONFERENCE

THEMES

We are suggesting as possible themes, the following.

Please feel free to change, adjust or even new approaches.

CHANGING STRATEGIES TO EMBRACE NEW POSSIBILITIES - THE GLOBAL MARKET

MOVING BEYOND BARRIERS TO A STRATEGY FOR GLOBAL COMPETITIVENESS

CHANGING STRATEGIES, BUILDING ALLIANCES, FACING NEW REALITIES

A REGION IN TRANSITION - 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

3) **EDUCATION**
- Collaboration with US institutions
- Curriculum development
- Presentation of Thinkfinity - high tech tool for teaching
- Initiative between the University of the West Indies and Medgar Evers College

Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10017
Tel: (212) 944-[redacted] Fax: (212) 944-2089
E-mail: [redacted]@caribnewsconference.com

To : Host Committee
Caribbean Multi-National Business Conference
cc. Bernard Hunt, Sonesta Maho Beach Resort

From : Karl B. Rodney
CARIB NEWS

Date : October 15, 2008

SUBJECT : Town Hall Meetings

In the interest of organizing successful Town Hall Meetings, and to make program print deadline, we suggest the use of the space available at the Sonesta Maho for those meetings.

We think the participation of the local groups and individuals in these meetings are necessary and productive because of the subject matter. We would therefore urge a strong outreach media program and direct contact to interest groups to ensure success of the Fora.

Thursday 5:00 – 6:30pm : Healthy Eating and Living

Friday 4:30 – 6:00pm : Education – Sharing Working Solutions

Saturday 4:30 – 6:00 pm : Technology

There is a great line up and we may have some additional star power. Commissioner Sarah Wescot-Williams also suggested she might have additional local speakers for these for a, and we welcome that.

Thanks for your kind cooperation.

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

DOING BUSINESS TOGETHER
CARIBNEWS

Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10017
Tel: (212) 944-[redacted] Fax: (212) 944-2089
E-mail[redacted]@caribnewsconference.com

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

President

Karl B. Rodney
Publisher/CEO

cc. Marla Chemont, Marketing Assistant

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

Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10017
Tel: (212) 944-[redacted] Fax: (212) 944-2089
E-mail: [redacted]@caribnewsconference.com

January 23, 2008

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

Dear Commissioner Wescot-Williams:

Thanks very much for inviting us to St. Maarten to explore the possibility of St. Maarten as the Host Venue for the Thirteenth Annual Caribbean Multi-National Business Conference, scheduled for November 6-9, 2008.

We had the pleasure of meeting with Commissioner Roy Marlin to discuss the conference, its mission and of course, St. Maarten's priorities to be addressed in the conference. Among the areas discussed were:

- The Passport issue and its impact on St. Maarten and the Caribbean
- The US Pre-clearance option and what are the possibilities
- Educational collaboration and in-state tuition consideration for students from St. Maarten
- A major women's initiative at the conference and targeting many large 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.

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

(3)

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

Because we know of your busy schedule, I will also follow up with your office to ascertain interest level.

Thanks for your kind consideration.

Best regards,

Faye A. Rodney
President

Karl B. Rodney
Publisher/CEO

(4)

Mar 10 09 04:39p W.L. McKenzie 770-971-[redacted] p.6

CARIB NEWS INC.

7 WEST 36TH STREET
8TH FLOOR
NEW YORK, 10018
212-944-[redacted]

Invoice

Date	Invoice #
7/16/2008	45122

Bill To
Wanda McKenzie IBM 2607 Jesters Court Marietta, GA 30068

Description	Amount
Sponsorship Multi-National Business Conference 2008 TAX ID 13-362060	20,000.00
Total	$20,000.00

09-2222_167

Mar 10 09 04:39p W.L. McKenzie 770-971-8565 p.7

2009-03-09 15:09 Dhl: Prepare a shipment: Print USA JRLHA 512-286-2461 >> 770 971 8565 Page 1 of 1 P 2/2

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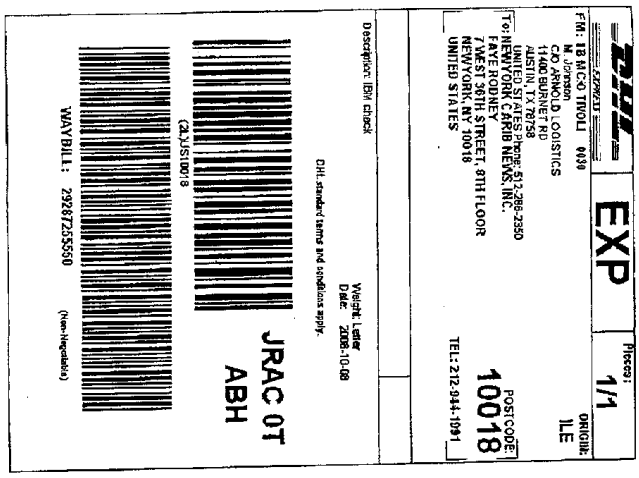

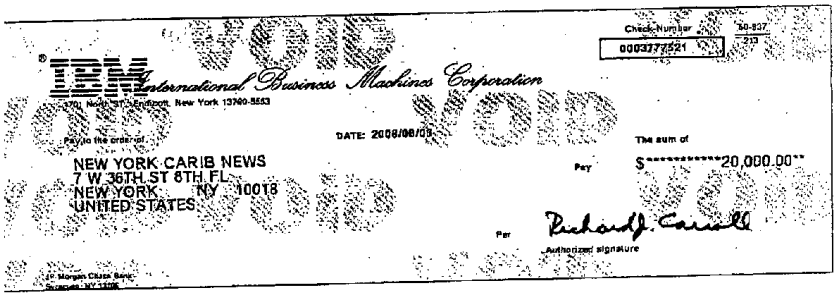

[redacted] [redacted]

7

https://corporateship.dhl-usa.com/shipmentdocuments/labeldoc.asp 10/8/2008

EXHIBIT 17

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Wednesday, November 28, 2007 10:40 AM
To: plouis
Subject: RE: Carib News Side-Trip Out of Country to Montserrat

Please note that the congressional travelers were unaware the proposed side-trip would take them out-of-country until they had arrived at the destination.

From: Kelly Mobley, Dawn
Sent: Wednesday, November 28, 2007 10:32 AM
To: 'plouis'
Subject: RE: Carib News Side-Trip Out of Country to Montserrat

Patricia:

I am in meetings this morning and unable to telephone the Rodneys. Would you please share my email (below) with them as soon as possible? We hope they have produced a modified itinerary and can forward that document asap since the (out-of-country) side trip was not pre-approved as mandated by the new Rules but must be reported to the House on all Members' post-trip travel logs.

Thank you,

Dawn

From: Kelly Mobley, Dawn
Sent: Tuesday, November 27, 2007 10:35 AM
To: 'plouis'
Subject: Carib News Side-Trip Out of Country to Montserrat

Please provide me with your telephone number again concerning the side trip to Montserrat taken by our Congresswoman/Chairwoman during the Congressional travel to Antigua. The side trip was not approved pre-trip given that it was out-of-country. Therefore, the itinerary did not include this piece of travel nor was available for review or approval. I understand the Rodney's traveled with the Congresswoman Tubbs Jones and others on this excursion. Following this leg of travel, the Congresswoman spoke with the Rodney's about the itinerary and possible reimbursement.

I need to follow up on a conversation with Congresswoman Tubbs Jones and the Rodney's about Carib News' effort to bring this portion of the trip into the itinerary/compliance and reimbursement for this unapproved travel.

Thank you very much.

Dawn

---

(202) 225-[redacted]
7392 Fax

CONFIDENTIAL

Registration

From: plouis [redacted]@nycaribnews.com]
Sent: Monday, October 15, 2007 11:00 AM
To: 'Kelly Mobley, Dawn'
Subject: RE: Carib News - Pre-trip Approval Issues

Ms. Olson,
In response to your e-mail, the answer to your question is NO.

Regards and Thanks for your patience

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

-----Original Message-----
From: Kelly Mobley, Dawn [mailto:Dawn.KellyMobley@mail.house.gov]
Sent: Monday, October 15, 2007 10:26 AM
To: plouis
Subject: FW: Carib News - Pre-trip Approval Issues

FYI

From: Olson, Susan
Sent: Friday, October 12, 2007 2:41 PM
To: plouis
Cc: Kelly Mobley, Dawn; O'Reilly, 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.?

- Antigua Government
- Sandals
- Royal Caribbean Bakery
- CITI
- Pfizer
- Macy's
- AT&T
- HSBC
- IBM

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

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

From: plouis [mailto:[redacted]@nycaribnews.com]
Sent: Thursday, October 11, 2007 10:37 AM
To: Olson, Susan
Subject: RE: Carib News - Pre-trip Approval Issues

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

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

Regards

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

-----Original Message-----
From: Olson, Susan [mailto:Susan.Olson@mail.house.gov]
Sent: Wednesday, October 10, 2007 4:01 PM
To: [redacted]@nycaribnews.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 (Foundation) trip to Antigua, the issues involving sponsorship are as follows:

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

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

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

> The Foundation, which is a 501(c)(3) nonprofit organization, will be paying for the Members' travel expenses including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a "contribution to the overall pool of expenses in contribution to the [Foundation]," which is used to "underwrite the overall expenses of the Conference," primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organization who will be attending and participating in the Conference.
>
> Accordingly, the Committee's Advisory Opinion, dated October 27, 2006, provided that all of the organizations that provided financial underwriting for the trip along with the Foundation were required to be listed as the "trip sponsors" on the participating Members' post-travel disclosure form and their 2006 annual financial disclosure statements.

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

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

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E-MAIL ADDRESS: [redacted]@AOL.COM;
[redacted]@ATT.NET

FACSIMILE TRANSMITTAL SHEET

TO:	FROM:
Susan Olsen	P. Louis
COMPANY: House Ctee on Standards	DATE: 10/12/07
FAX NUMBER: 202-225-7392	TOTAL NO. OF PAGES INCLUDING COVER:

RE: Travel Certification Form

☐ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ YOUR INFORMATION

Ms. Olsen,
In response to your e-mail – the Conference is paid for by CARIB NEWS FOUNDATION.

The companies are participants. They are not sponsors or co-sponsors for any part of the trip and play no role in the planning or content.

The program has been amended to reflect the companies as Participants.

I regret the misunderstanding and thank you for your patience as I go through and grow through this process, which is new to me.

I look forward to hearing from you.

Regards

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.

From: Kelly Mobley, Dawn
Sent: Friday, October 12, 2007 11:55 AM
To: 'plouis'
Subject: RE: Confidential

Have you spoken with your Director and explained the problem so you can call Olson asap?

From: Kelly Mobley, Dawn
Sent: Friday, October 12, 2007 9:59 AM
To: 'plouis'
Subject: FW: Confidential

Please read both emails below. Give Susan a call as soon as you work through the 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: Carib News - Pre-trip Approval issues

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

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

me know. Thanks! Susan

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

From: plouis [mailto:[redacted]@nycaribnews.com]
Sent: Thursday, October 11, 2007 10:33 AM
To: Olson, Susan
Subject: RE: Carib News - Pre-trip Approval Issues

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

No federally registered lobbyist or foreign agent will be accompanying the Members or
participating in the program.

Regards

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

-----Original Message-----
From: Olson, Susan [mailto:Susan.Olson@mail.house.gov]
Sent: Wednesday, October 10, 2007 4:01 PM
To: [redacted]@nycaribnews.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

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

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

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

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

> The Foundation, which is a 501(c)(3) nonprofit organization, will be paying for the Members' travel expenses including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a "contribution to the overall pool of expenses in contribution to the [Foundation]," which is used to "underwrite the overall expenses of the Conference," primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organization who will be attending and participating in the Conference.
>
> Accordingly, the Committee's Advisory Opinion, dated October 27, 2006, provided that all of the organizations that provided financial underwriting for the trip along with the Foundation were required to be listed as the "trip sponsors" on the participating Members' post-travel disclosure form and their 2006 annual financial disclosure statements.

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

Susan L. Olson
Counsel
House Committee on Standards of Official Conduct

10/12/2007

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

THE NEW YORK CARIBNEWS
THE WEEKLY VOICE OF THE CARIBBEAN-AMERICAN COMMUNITY
7 WEST 36TH STREET, 8th FLOOR, NEW YORK, NY 10018

TEL: (212) 944-[redacted]; FAX: (212) 944-2089
E-MAIL ADDRESS: [redacted]@AOL.COM;
[redacted]@ATT.NET

FACSIMILE TRANSMITTAL SHEET

TO: Dawn Kelly Mobley	FROM: P. Louis
COMPANY: Ethics Counsel for Cong. Stephanie Tubbs Jones	DATE: 10/11/07
FAX NUMBER: 202-225-7392	TOTAL NO. OF PAGES INCLUDING COVER:
RE: Travel Form	

☐ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ YOUR INFORMATION

Further to our conversations of this morning, following is the Travel Certification Form ..

The Conference is paid for by the Carib News Foundation. The companies are participants , are not sponsors or co-sponsors for any part of the trip and play no role in the planning or content.

The program has been amended to reflect the companies as Participants

I regret the mis-understanding and thank you for holding my hand as I go through and grow through this process which is new to me.

Kindly review and advise before I send to Ms. Olsen.

I look forward to hearing from you.

Registration

From: Thomas, Shelley [Shelley.Thomas@mail.house.gov]
Sent: Thursday, October 11, 2007 7:47 AM
To: plouis
Subject: RE: Carib News - Pre-trip Approval Issues

This is new territory since we never had to go through this before. I don't have an answer and I already turned in Donna's forms.

From: plouis [mailto:[redacted]@nycaribnews.com]
Sent: Wednesday, October 10, 2007 5:56 PM
To: Kelly Mobley, Dawn; Thomas, Shelley; Dalley, George
Subject: FW: Carib News - Pre-trip Approval Issues

Please see e-mail I received from Ms. Olson of the Committee on Standards of Official Conduct.

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

Please advise us.

Regards and Thanks

Patricia Louis
Executive Assistant
CARIB NEWS
7 West 36th Street, 8th Floor
New York, NY 10018
-----Original Message-----
From: Olson, Susan [mailto:Susan.Olson@mail.house.gov]
Sent: Wednesday, October 10, 2007 4:01 PM
To: [redacted]@nycaribnews.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 (Foundation) trip to Antigua, the issues involving sponsorship are as follows:

While the sponsor form that you completed indicates that the Foundation is the sole sponsor of the 2007 trip, the draft schedule, however, indicates that the following entities are "sponsoring"

sessions, events, etc. during this trip:

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

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

> The Foundation, which is a 501(c)(3) nonprofit organization, will be paying for the Members' travel expenses including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a "contribution to the overall pool of expenses in contribution to the [Foundation]," which is used to "underwrite the overall expenses of the Conference," primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organization who will be attending and participating in the Conference.
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> Accordingly, the Committee's Advisory Opinion, dated October 27, 2006, provided that all of the organizations that provided financial underwriting for the trip along with the Foundation were required to be listed as the "trip sponsors" on the participating Members' post-travel disclosure form and their 2006 annual financial disclosure statements.

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

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

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Wednesday, October 10, 2007 6:49 PM
To: [redacted]@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

-----Original Message-----
From: plouis <[redacted]@nycaribnews.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

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

-----Original Message-----
From: Olson, Susan [mailto:Susan.Olson@mail.house.gov]
Sent: Wednesday, October 10, 2007 4:01 PM

10/10/2007

To: [redacted]@uycaribnews.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 (Foundation) trip to Antigua, the issues involving sponsorship are as follows:

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

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

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

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

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

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

10/10/2007

at&t Worldnet

[Print] [Close]

From: "Thomas, Shelley" <Shelley.Thomas@mail.house.gov>
To: "James, Corliss" <Corliss.James@mail.house.gov>, "Long, Karyn" <Karyn.Long@mail.house.gov>, "Bishop, Mary" <Mary.Bishop@mail.house.gov>, "Chaplin, Jennie" <Jennie.Chaplin@mail.house.gov>, "Pickens, Crystal" <Crystal.Pickens@mail.house.gov>, "Hamlett, Bjenell" <Barbara.Hamlett@mail.house.gov>, "Hendricks, Jasper" <Jasper.Hendricks@mail.house.gov>, "Dailey, Katie" <Katie.Dailey@mail.house.gov>, "GA04Scheduling" <GA04Scheduling@mail.house.gov>, "Murray, Darlene" <Darlene.Murray@mail.house.gov>, "Fisher, Pat" <Pat.Fisher@mail.house.gov>, "Featherson, Wendy" <Wendy.Featherson@mail.house.gov>, "Pittman, Megan" <MPittman@mail.house.gov>, "King, Lalla" <Lalla.King@mail.house.gov>, "Resendez, Marvene" <Marvene.Resendez@mail.house.gov>, "Kalinga, Tatyana" <Tatyana.Kalinga@mail.house.gov>, "Taylor, Gerri" <Gerri.Taylor@mail.house.gov>, "Anderson, Kwamme (Waters)" <Kwamme.Anderson@mail.house.gov>, "Howie, Elisa" <Elisa.Howie@mail.house.gov>, "Borja, Angie" <Angie.Borja@mail.house.gov>, "Roddey, Raven" <raven.roddey@mail.house.gov>, "Waskow, Jean" <Jean.Waskow@mail.house.gov>, "Holmes, Alice M." <Alice.M.Holmes@mail.house.gov>, "Epps, Nkena" <Nkena.Epps@mail.house.gov>, "Johnson, Aya" <Aya.Johnson@mail.house.gov>
Cc: <[redacted]@att.net>
Subject: Emailing: 110th_rule_change_page
Date: Thu, 4 Oct 2007 16:36:27 +0000

To the CBC Members who indicated a "yes" or "maybe" in attending the Carib News Foundation Business Conference in Antigua, British West Indies on November 8-11 of 2007, I have attached the web site for the travel form that must be submitted by Members no later than TUESDAY, October 9 to the Ethics Committee. I will be bringing copies of the agenda, as well as copies of the ethics form that Carib News had to complete and submit to Ethics, to all of the offices indicated above, today and tomorrow by noon. If anyone has any questions, please call me at 5-1790. PLEASE MAKE SURE THAT MEMBERS HAVE THEIR OFFICIAL PASSPORT, AS WE ARE GOING TO A FOREIGN COUNTRY.

The message is ready to be sent with the following file or link attachments:

Shortcut to: http://www.house.gov/ethics/110th_rule_change_page.htm

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.
<<110th_rule_change_page.url>>

Attachment 1: 110th_rule_change_page.url (application/octet-stream)

New Travel Regulations, Forms, and Instructions (effective March 1, 2007):

The House Rules for the 110th Congress changed the travel rules for Members, staff, and outside sponsors. Regulations, forms, and instructions governing privately-sponsored travel taking place after March 1, 2007 are available below. An Advisory Memorandum providing additional guidance regarding travel was released on March 15, 2007. New versions of the forms relating to privately-sponsored travel were released April 6, 2007.

- Travel Guidelines and Regulations
- Instructions and Certification Form to be filled out by Private Sponsors
- Traveler Form to be filled out by Members, Officers, and Employees
- Post-Travel Disclosure Form for Members and Officers
- Post-Travel Disclosure Form for Employees

Please note: Both the Private Sponsor Certification **and** the Member/Officer/Employee Traveler Forms must be filed with the Committee at the same time in order to process your request.

New Gift Rule Changes:

The House Rules for the 110th Congress amended House Rule 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 the gift rule. On May 24, 2007, the House amended the gift rule exception concerning the acceptance of offers of free attendance at charity events. In view of the amendment, on June 14, 2007, the Committee issued a revised memorandum that incorporates the change to the rule. Please contact Committee staff at 202-225-7103 with any questions.

Financial Interests under New Earmark Rules

The House Rules for the 110th Congress changed the Code of Official Conduct regarding earmarks. This provision requires that a Member, Delegate, or Resident Commissioner who requests an earmark or a limited tax or tariff benefit to provide certain information regarding the request and its purpose to the committee of jurisdiction. An Advisory Memorandum providing guidance in this matter was released on March 27, 2007.

Registration

From: Smith, Hilary [Hilary.Smith@mail.house.gov]
Sent: Thursday, October 04, 2007 4:32 PM
To: [redacted]@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 Carib News' Annual conference.

The revised forms, along with the list of invitees, should be sent to each invitee to then send to the committee so that we do not receive the wrong forms from the Congressional offices. Let me know if you have any questions.

Hilary Smith

Committee on Standards of Official Conduct

HT-2, The Capitol

Washington, DC 20515

202-225-7103

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Wednesday, October 03, 2007 2:02 PM
To: plouis
Subject: RE: Please read query below

Ignore the last email b/c we are working to meet the 30-day submission. Just stand by so we can get back in touch today; have it all resolved tomorrow. Monday is a holiday.

From: Kelly Mobley, Dawn
Sent: Wednesday, October 03, 2007 12:39 PM
To: 'plouis'
Subject: RE: Please read query below

Thank you. We have assigned your review to Staff Attorney Susan Olson. Please reach her by phone at 202/226-[redacted] next week if she has not reached out to you. She will need a few days of review. Thank you very much.

From: plouis [mailto:[redacted]@nycaribnews.com]
Sent: Monday, October 01, 2007 6:40 PM
To: Kelly Mobley, Dawn
Subject: RE: Please read query below

The Conference dates are November 8-11, 2007: and opens on Thursday November 8 and
ends the morning of November 11, 2007- (3 nights)

CARIB NEWS FOUNDATION is the Sponsor of the event.

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

Awaiting your advice.

Regards

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

-----Original Message-----
From: Kelly Mobley, Dawn [mailto:Dawn.KellyMobley@mail.house.gov]
Sent: Monday, October 01, 2007 5:10 PM

10/3/2007

Registration

From: plouis [[redacted]@nycaribnews.com]
Sent: Monday, October 01, 2007 6:40 PM
To: 'Kelly Mobley, Dawn'
Subject: RE: Please read query below

The Conference dates are November 8-11, 2007: and opens on Thursday November 8 and
ends the morning of November 11, 2007- (3 nights)

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Awaiting your advice.

Regards

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

-----Original Message-----
From: Kelly Mobley, Dawn [mailto:Dawn.KellyMobley@mail.house.gov]
Sent: Monday, October 01, 2007 5:10 PM
To: plouis
Subject: RE: Please read query below

From: Kelly Mobley, Dawn
Sent: Monday, October 01, 2007 5:08 PM
To: Kelly Mobley, Dawn
Subject: RE: Query

We are trying to work through a problem in approving the co-sponsors piece. Are they each paying for a *one-day, widely attended* event or more days? Please read the Gift Rules I forwarded you on this matter.

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

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

From: plouis [mailto:[redacted]@nycaribnews.com]
Sent: Monday, October 01, 2007 6:40 PM
To: Kelly Mobley, Dawn
Subject: RE: Please read query below

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ends the morning of November 11, 2007- (3 nights)

CARIB NEWS FOUNDATION is the Sponsor of the event.

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Awaiting your advice.

Regards

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

-----Original Message-----
From: Kelly Mobley, Dawn [mailto:Dawn.KellyMobley@mail.house.gov]
Sent: Monday, October 01, 2007 5:10 PM
To: plouis
Subject: RE: Please read query below

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Monday, October 01, 2007 5:10 PM
To: plouis
Subject: RE: Please read query below

From: Kelly Mobley, Dawn
Sent: Monday, October 01, 2007 5:08 PM
To: Kelly Mobley, Dawn
Subject: RE: Query

We are trying to work through a problem in approving the co-sponsors piece. Are they each paying for a *one-day, widely attended* event or more days? Please read the Gift Rules I forwarded you on this matter.

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

I am working through your forms before leaving them with our 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?

From: Kelly Mobley, Dawn
Sent: Tuesday, September 18, 2007 12:57 PM
To: 'plouis'
Subject: RE: Draft Program - 2007Business Conference (No agenda or program attached)

When you send the draft agenda, please also forward any information on your sponsor's status. If/he cannot be a lobbyist. Do you need a copy of the new travel rules?

From: Kelly Mobley, Dawn
Sent: Monday, September 17, 2007 5:53 PM
To: 'plouis'
Subject: RE: Draft Program - 2007Business Conference

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

From: plouis [mailto:[redacted]@nycaribnews.com]
Sent: Monday, September 17, 2007 3:47 PM
To: Kelly Mobley, Dawn
Subject: Draft Program - 2007Business Conference

Ms. Mobley:
We spoke earlier re permission for Members to attend the Conference and you asked for

CONFIDENTIAL

The program. I have not gotten back to you because we have been working on getting the program together.
Attached is the draft for your guidance

Regards and Thanks

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

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THE WEEKLY VOICE OF THE CARIBBEAN-AMERICAN COMMUNITY
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TEL: (212) 944-[redacted]; FAX: (212) 944-2089
E-MAIL ADDRESS: [redacted]@AOL.COM;
[redacted]@ATT.NET

FACSIMILE TRANSMITTAL SHEET

TO:	FROM:
Dawn Kelly Mobley	Patricia Louis
COMPANY:	DATE: 9/21/07
FAX NUMBER: 202-225-7392	TOTAL NO. OF PAGES INCLUDING COVER:
RE: SPONSOR FORMS	

☐ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ YOUR INFORMATION

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

Regards

Louis

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 Foundatin
2. I represent that the trip will not be financed (in whole or in part) by a federally-registered lobbyist or a registered foreign agent (*signify "yes" by checking box*): ☑
3. I represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip (*signify "yes" by checking box*): ☑
4. Is travel being offered to an accompanying family member of the House invitee(s)? ☑ Yes ☐ No
5. Provide names and titles of ALL House invitees; for each invitee, provide explanation of why the individual was invited (include additional pages if necessary): each represenatives spouse is invited or one family menber.
6. Dates of travel: November 8-11, 2007
7. Cities of departure – destination – return: Varies depending on member
8. Attached is a detailed agenda of the activities taking place during the travel (*i.e.*, an hourly description of planned activities) (*signify "yes" by checking box*): ☑
9. I represent that (*check one of the following*):
   a. The sponsor of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965: ☐ or
   b. The sponsor of the trip does not retain or employ a federally registered lobbyist or registered foreign agent: ☑ or
   c. The trip is for attendance at a one-day event *and* lobbyist involvement in planning, organizing, requesting, or arranging the trip was *de minimis* under the Committee's travel regulations. ☐
10. If travel is for participation in a one-day event (*i.e.*, if you checked Question 9(c)), check one of the following:
    a. One-night's lodging and meals are being offered: ☐ or
    b. Two-nights' lodging and meals are being offered: ☐
    If "b" is checked, explain why the second night is warranted:

11. If the trip is not sponsored by an institution of higher education, I represent that a federally-registered lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip (*signify "yes" by checking box*): ☑

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

13. Describe each sponsor's organizational interest in the purpose of the trip: Regular scheduled air service, economy class.

14. Describe the type and class of the transportation being provided. Indicate whether coach, business-class or first-class transportation will be provided. In addition, for travel via aircraft, please indicate if travel is being offered on a commercial flight, chartered flight or on an aircraft operated or paid for by a carrier not licensed by the Federal Aviation Administration to operate for compensation or hire (*i.e.*, a private aircraft). If first-class fare is being provided, or if travel is via chartered or private aircraft, please provide an explanation describing why such travel is warranted:

15. I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s). (*signify "yes" by checking box*): ☑

16. I represent that either (*check one of the following*):
    a. The trip involves an event that is arranged or organized *without regard* to congressional participation and that meals provided to congressional participants are similar to those provided to or purchased by other event attendees: ☑ or
    b. The trip involves events that are arranged or organized *specifically with regard* to congressional participation: ☐
    If "b" is checked, detail the cost per day of meals (approximate cost may be provided):

17. Reason for selecting the location of the event or trip: A Caribbean country that has not previously hosted the conference.

18. Name of hotel or other lodging facility: Sandals Resort/Rex Resort

19. Cost per night of hotel or other lodging facility (approximate cost may be provided): $110.00

20. Reason(s) for selecting hotel or other lodging facility: Has appropriate meeting rooms

21. TOTAL EXPENSES FOR EACH PARTICIPANT:

☐ actual amounts ☑ good faith estimates	Total *Transportation* Expenses per Participant	Total *Lodging* Expenses per Participant	Total *Meal* Expenses per Participant
For each Member, Officer, or employee	320	330	195
For each accompanying family member	320	0	195

	Other Expenses (dollar amount)	Identify Specific Nature of "Other" Expenses (*e.g.*, taxi, parking, registration fee, *etc.*)
For each Member, Officer, or employee		
For each accompanying family member		

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

23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: _____

Name and title: _____

Organization: _____

Address: _____

Telephone number: _____

Fax number: _____

Email Address: _____

The Committee staff may contact the above individual above if additional information is required.

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

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

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

INSTRUCTIONS FOR FILLING OUT THE PRIVATE SPONSOR TRAVEL CERTIFICATION FORM

1. *Sponsor(s) (who will be paying for the trip):* Fill in the names of each person, organization, or other entity contributing funds or in-kind support towards the trip.

2. *I represent that the trip will not be financed (in whole or in part) by a federally-registered lobbyist or a registered foreign agent:* House Members and staff may not accept travel funded by a lobbyist or registered foreign agent, even when the lobbyist or foreign agent will be reimbursed by a client or employer.

3. *I represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip:* All financial contributors to the trip must qualify as sponsors and should be listed as a sponsor in response to question 1.

4. *Is travel being offered to an accompanying family member of the House invitee(s)?* Check yes or no. House Rules permit Members and House staff to accept travel benefits for one accompanying family member if offered by the trip sponsor.

5. *Provide names and titles of ALL House invitees; for each invitee, provide explanation of why the individual was invited:* You must list every House Member and employee who is invited on the trip, together with your reason for inviting that individual. Members and House staff may accept privately sponsored travel only when related to the individual's official duties. The explanation should demonstrate a connection between the trip and each invitee's official duties.

6. *Dates of Travel:* State the dates of departure and return.

7. *Cities of departure – destination – return:* For example, an appropriate entry might read: "DC – Detroit – DC". Include additional destinations if there will be more than one. Do not list the names of airports, times of flights, or cities where travelers will have an airport layover (this information should be included in the attached detailed agenda).

8. *Attached is a detailed agenda of the activities taking place during the travel:* The agenda should be a detailed, hour-by-hour agenda. Include the names of speakers and the subjects of briefings. The agenda should also include information regarding the time spent on travel to and from the destination, as well as local travel. Travel will not be approved if the agenda includes an excessive amount of either unscheduled time and/or opportunities for recreational activities, even if such activities are at the personal expense of the invitees.

9. *I represent that (check one of the following):* Check only one box in response to this question. "Institutions of higher education" generally includes accredited public and private colleges or trade schools located in the U.S. and its territories; such entities should check box "a," regardless of whether they employ or retain a federal lobbyist or foreign agent. Entities other than institutions of higher education that do not employ or retain a federal lobbyist or foreign agent should check box "b." Entities other than institutions of higher education that do employ or retain a registered lobbyist or foreign agents may sponsor travel only for one-day events. For such trips, lobbyist involvement must be *"de minimis"* as defined by Committee regulations (see question 12).

10. *If travel is for participation in a one-day event, check one of the following:* Complete this question only if you checked box "c" in response to question 9. For travel to one-day events sponsored by an entity that retains or employs a lobbyist, lodging and meals generally may be provided only for one night. However, two nights may be authorized by the Committee in accordance with the factors set forth in Committee regulations.

11. *If the trip is not sponsored by an institution of higher education, I represent that a federally-registered lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip:* House Rules prohibit Members and employees from being accompanied by registered lobbyists or foreign agents while traveling. This rule does not prohibit lobbyist or foreign agent participation in briefings or meetings that occur at the destination.

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

13. *Describe each sponsor's organizational interest in the purpose of the trip:* Briefly describe the interest or purpose of each sponsor in the trip.

14. *Describe the type and class of transportation being provided:* See directions on form.

15. *I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s):* While Members and staff may accept local transportation necessary in facilitating their participation in officially-connected aspects of a trip, Members and staff may not accept local transportation in connection with recreation or entertainment.

16. *I represent that either:* For events that are arranged or organized without regard to congressional participation (*e.g.*, annual meetings of business or trade associations), Members or employees may accept the meals that are provided to all other attendees as part of the event. For events put on specifically for Members or staff, meal expenses must be "reasonable" in accordance with Committee regulations.

17. *Reason for selecting the location of the event or trip:* The destination of a trip must be related to its purpose. Travel to a location of an event organized without regard to congressional participation (for example, annual meetings of business or trade associations) is presumptively reasonable.

18. *Name of hotel or other lodging facility:* Include the names of all hotels and lodging facilities to be used during the trip.

19. *Cost per night of hotel or other lodging facility:* Self-explanatory. Trip sponsors should not pay for a "package" that includes recreational or entertainment activities. However, Members and staff may generally use a pool or gym facilities that are offered free of charge to all hotel guests.

20. *Reason(s) for selecting hotel or other lodging facility:* For events held without regard to congressional participation (*e.g.*, annual meetings of business or trade associations), an entry such as "location of annual trade association meeting" is sufficient. When the trip is held specifically for Members or staff, include rationale such as proximity to the site to be visited or to the airport.

21. *Total Expenses for Each Participant:* Indicate whether the figures provided are actual amounts or good faith estimates by checking the appropriate box. All trip expenses should be included. Expenses other than those for transportation, lodging and meals must be individually listed and specified.

22. *I represent that reimbursement for miscellaneous travel expenses for the trip, such as travel to and from airports, security costs, interpreter fees, visa application fees, and similar expenses, will be for actual costs incurred and are necessary for the purpose of the trip:* Members and staff may not accept a lump sum based on an estimate of incidental expenses.

23. *Certification Information:* Self-explanatory.

THE TRIP SPONSOR SHOULD PROVIDE A COPY OF THE COMPLETED FORM, INCLUDING ALL ATTACHMENTS, TO EACH HOUSE MEMBER OR EMPLOYEE INVITED ON THE TRIP.

Version date 4/2007 Committee on Standards of Official Conduct

U.S. House of Representatives

COMMITTEE ON STANDARDS OF
OFFICIAL CONDUCT
Washington, DC 20515

October 27, 2006

Ms. Michele Rodney
Carib News Foundation
7 West 36th Street, 8th Floor
New York, NY 10018

Dear Ms. Rodney:

This responds to your letter requesting Committee guidance concerning the participation of House Members in the 11th Annual Caribbean Multi-National Business Conference ("Conference") sponsored by the Carib News Foundation ("Foundation"), and other organizations.[1] The conference is scheduled to take place in Panama City, Panama from November 9 to 12, 2006. According to your submission, the Foundation, which is a 501(c)(3) nonprofit organization, will be paying for the Members' travel expenses including transportation, meals, and lodging. The background materials for the Conference also indicate that the additional trip sponsors provide a "contribution to the overall pool of expenses in contribution to the [Foundation]," which is used to "underwrite the overall expenses of the Conference," primarily for meal expenses. These materials further provide that these additional sponsors have representatives from their organization who will be attending and participating in the Conference.

The Committee on Standards of Official Conduct strongly encourages outside organizations considering whether to offer travel expenses to House Members and staff to contact our offices for information about the rules governing the acceptance of such an offer. It is important to bear in mind, however, that the Committee is authorized by the Rules of the U.S. House of Representatives to render advisory opinions to Members, officers, and employees regarding the propriety of current or proposed conduct. We do not render such opinions to private organizations. Particularly in the case of travel, it is the Member, officer, or employee who is at risk in the case of a violation of the rules. Given the different circumstances in which individual Members and employees find themselves, it would be inappropriate for an outside organization to suggest that a trip had been "pre-cleared" by the Committee. However, we are able to provide you with some general information.

[1] According to your submission, the additional trip sponsors include Macy's, Jerk QZine, Pfizer, AT&T, Golden Krust Franchises, American Airlines, Citibank, IBM, Panama City, and the Republic of Panama.

House Rule 25, clause 5 (the gift rule) permits a Member or employee of the House to accept from a private source (other than a registered lobbyist or agent of a foreign principal) the necessary travel expenses to attend a meeting, speaking engagement, fact-finding trip, or similar event in connection with official duties, if the private source is directly and immediately associated with the event or location being visited. "Necessary" expenses include reasonable expenses for transportation, lodging, food, and refreshments, but they do not include expenditures for entertainment or recreational activities.

Generally, any gifts that may be offered during the trip, including any gifts of entertainment or recreational activity, must be valued at a total of less than $50 for the trip, with the annual gift limit of less than $100 from a single source. On any trip, the aggregate value of any such gifts that may be accepted from any source is less than $50.

In the case of international travel, necessary expenses may be accepted for not more than seven days, excluding travel. House Members may also accept expenses to enable one family member to accompany them on the trip, if offered by the trip sponsor. In addition, each Member who participates in the trip must complete a Travel Disclosure and file this form with the Clerk of the House within 30 days after their return. See House Rule 25, cl. 5(b)(1)(A)(ii), (b)(3). Members are also required to report all travel expenses totaling more than $305 from a single source on Schedule VII of their annual Financial Disclosure Statement under the Ethics in Government Act and House Rule 26. On both forms, Members should indicate as the "trip sponsors" all of the organizations that provided financial underwriting for the trip.

Because the trip will involve meetings with foreign government representatives and the trip sponsors include the Republic of Panama and Panama City, it is important to note that government officials, including Members and employees of Congress, are prohibited by Article I, section 9, clause 8, of the United States Constitution from receiving "any present . . . of any kind whatever" from a foreign state or a representative of a foreign government without the consent of the Congress. In the Foreign Gifts and Decorations Act (5 U.S.C. § 7342) ("FGDA"), Congress has consented in advance to acceptance of gifts of travel or expenses for travel taking place entirely outside of the United States offered by a foreign government. Gifts of travel or expenses for travel include food, lodging, transportation, and entertainment related to the official duties of a Member, officer, or employee. Congress has also consented to the acceptance of gifts "of minimal value tendered as a souvenir or mark of courtesy." 5 U.S.C. § 7342(c)(1)(A). Under this provision and implementing regulations issued by this Committee, the term "minimal value" is defined as $305. The FGDA also permits Members and staff to accept a gift worth more than minimal value when refusal would cause offense or embarrassment; such gifts are the property of the United States and must be deposited with the Clerk of the House. Any tangible gifts valued in excess of minimal value or travel expenses of any value received from a foreign government pursuant to FGDA must be disclosed on a Form for Disclosing Gifts from Foreign Governments, in addition to the

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

Any House Members invited to travel at private expense should be encouraged to contact this Committee's Office of Advice and Education at (202) 225-7103 if they have any questions on the applicable rules. Please provide a copy of this letter to each invited Member.

If you have any further questions, please contact the Committee's Office of Advice and Education at extension 5-7103.

Sincerely,

Doc Hastings
Chairman

Howard L. Berman
Ranking Minority Member

DH/HLB: slo

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

October 16, 2006

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

Via Fax: 202-225-7392 & US Mail

Dear Committee Chair Hastings:

As you might be aware, The Carib News Foundation, created to provide a forum for businesses from the United States to dialogue and establish business partnerships with communities in other parts of the world, has invited Members of Congress to participate in the 11th anniversary of the Caribbean Business Conference.

This year the conference will be held in Panama City, Panama from November 9 – 12, 2006. In cooperation with the Government of Panama, our goal is to have all interested parties joining forces to foster an atmosphere of democracy, stability and opportunity for our fellow citizens of the world. It will also allow businesses in the United States to introduce their products to a new market, thus adding to the economy of both countries.

It is important for Members of Congress to attend in order to get insights into the global economy and how current law and proposed legislation can add in assisting their constituents to move towards a global exchange.

To this effort, The Carib News Foundation and its Board of Directors, respectfully request approval for the Members to attend. If there are any questions or concerns, you may contact me at 212-944-[redacted]. I look forward to making this event as successful in its 11th year as it has been in the past 10 conferences.

Sincerely,

Michele Rodney
President
Carib News Foundation

cc: Congresswoman Stephanie Tubbs-Jones

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

03/20/2009 08:43 FAX CARIB NEWS 002/005

Registration

From: plouis [[redacted]@nycaribnews.com]
Sent: Friday, September 21, 2007 1:56 PM
To: 'Dawn.KellyMobley@mail.house.gov'
Subject: Re Sponsorship information

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

The CARIB NEWS FOUNDATION does not retain or employ a registered lobbyist or registered foreign agent.

Please use me as your contact for the purposes of this Conference.

The form will be emailed to you this afternoon.

Regards
Patricia Louis

Executive Assistant
CARIB NEWS
7 West 36th Street, 8th Floor
New York, NY 10018

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Wednesday, September 19, 2007 6:32 PM
To: [redacted]@nycaribnews.com
Subject: Re: Sponsorship information

My condolences. No, we did not know of their loss. Is Mr. Rodney our actual contact in this matter? If so when appropriate, please impress upon him that the rules have changed dramatically and there are certain gifts and travel that can no longer be permitted so we need to clear this as early as possible. Moreover as he probably remembers, all Members have to seek approval for their individual travel....forms must be prepared, submitted, and approved for each Member's travel. Therefore, please remember to provide each of your invitees with the requisite paperwork. Hopefully by preparing early, we can circumvent the majority of problems you faced in securing their congressional travel last year. Have a good evening and please share my condolences with the Rodneys. Dawn

---

Sent using BlackBerry

-----Original Message-----
From: plouis <[redacted]@nycaribnews.com>
To: Kelly Mobley, Dawn
Sent: Wed Sep 19 18:23:58 2007
Subject: Sponsorship information

CONFIDENTIAL

Registration

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Wednesday, September 19, 2007 3:23 PM
To: plouis
Subject: RE: Draft Program - 2007Business Conference (No agenda or program attached)

Lastly, just send the sponsor form asap for review. The new rules might prohibit some things you were able to do with so many different sponsors in the past, but until we get the form, we can't make the most informed decision. I have let the Congresswomen know we are awaiting your sponsor form. Just as you do, they would also like assurance. Thank you.

From: Kelly Mobley, Dawn
Sent: Wednesday, September 19, 2007 3:09 PM
To: 'plouis'
Subject: RE: Draft Program - 2007Business Conference (No agenda or program attached)

I am mailing (US Postal) a copy of the official Gifts and Travel Guide. Some pages are omitted so call with any questions not addressed in the bound pages. I am using the address you provide in your emails.

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

Patricia:

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

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

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

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

From: Kelly Mobley, Dawn [Dawn.KellyMobley@mail.house.gov]
Sent: Tuesday, September 18, 2007 7:03 PM
To: [redacted]@nycaribnews.com
Subject: Re: Draft Program - 2007Business Conference (No agenda or program attached)

Do any of these organizations have overseas lobbyists?

Sent using BlackBerry

CONFIDENTIAL

We had received the forms from Shelley.
The sponsors to date are : MACYS, PFIZER, AMERICAN AIRLINES, GOLDEN KRUST BAKERY, CARIBBEAN FOOD DELIGHTS, PREFERRED HEALTH PARTNERS, IBM, AT&T/CINGULAR

Regards

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

-----Original Message-----
From: Kelly Mobley, Dawn [mailto:Dawn.KellyMobley@mail.house.gov]
Sent: Tuesday, September 18, 2007 12:57 PM
To: plouis
Subject: RE: Draft Program - 2007Business Conference (No agenda or program attached)

When you send the draft agenda, please also forward any information on your sponsor's status. If/he cannot be a lobbyist. Do you need a copy of the new travel rules?

From: Kelly Mobley, Dawn
Sent: Monday, September 17, 2007 5:53 PM
To: 'plouis'
Subject: RE: Draft Program - 2007Business Conference

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

From: plouis [mailto:[redacted]@nycaribnews.com]
Sent: Monday, September 17, 2007 3:47 PM
To: Kelly Mobley, Dawn
Subject: Draft Program - 2007Business Conference

Ms. Mobley:
We spoke earlier re permission for Members to attend the Conference and you asked for The program. I have not gotten back to you because we have been working on getting the program together.
Attached is the draft for your guidance

Regards and Thanks

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

EXHIBIT 18

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

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM
(provide directly to each House invitee)

This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers or employees under House Rule XXV, clause 5. A completed copy of the form (and any attachments) should be provided to each invited House Member, officer or employee, who will then forward it to the Committee. The trip sponsor should NOT submit the form directly to the Committee.

Private sponsors are urged to submit this form to each House invitee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the invitee not receiving approval for the trip. The submission of an incomplete form will delay the review process. Before completing this form, sponsors are urged to *carefully review* the Committee's private travel guidelines and advisory memoranda detailing the rules and restrictions for private travel, as well as the instructions for completing this form. Sponsors should call the Committee with any questions prior to submitting the form. *Please type form.*

1. Sponsor(s) (who will be paying for the trip): CARIB NEWS FOUNDATION

2. I represent that the trip will not be financed (in whole or in part) by a federally-registered lobbyist or a registered foreign agent (*signify "yes" by checking box*): ☑

3. I represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip (*signify "yes" by checking box*): ☑

4. Is travel being offered to an accompanying family member of the House invitee(s)? ☑ Yes ☐ No

5. Provide names and titles of ALL House invitees; for each invitee, provide explanation of why the individual was invited (include additional pages if necessary): EACH REPRESENTATIVE'S SPOUSE

6. Dates of travel: NOVEMBER 8 - 11, 2007

7. Cities of departure – destination – return: VARIES DEPENDING ON MEMBER

8. Attached is a detailed agenda of the activities taking place during the travel (*i.e.*, an hourly description of planned activities) (*signify "yes" by checking box*): ☑

9. I represent that (*check one of the following*):
   a. The sponsor of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965: ☐ or
   b. The sponsor of the trip does not retain or employ a federally registered lobbyist or registered foreign agent: ☑ or
   c. The trip is for attendance at a one-day event *and* lobbyist involvement in planning, organizing, requesting, or arranging the trip was *de minimis* under the Committee's travel regulations. ☐

10. If travel is for participation in a one-day event (*i.e.*, if you checked Question 9(c)), check one of the following:
    a. One-night's lodging and meals are being offered: ☐ or
    b. Two-nights' lodging and meals are being offered: ☐
    If "b" is checked, explain why the second night is warranted:

11. If the trip is not sponsored by an institution of higher education, I represent that a federally-registered lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip (*signify "yes" by checking box*): ☑

12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip:
CARIB NEWS FOUNDATION (SEE ATTACHED SHEET)

13. Describe each sponsor's organizational interest in the purpose of the trip:
THE INTEREST OF CARIB NEWS FOUNDATION IS TO PROMOTE, INFORMATION, TRADE AND MEANINGFUL CONNECTION BETWEEN THE UNITED STATES AND THE CARIBBEAN

14. Describe the type and class of the transportation being provided. Indicate whether coach, business-class or first-class transportation will be provided. In addition, for travel via aircraft, please indicate if travel is being offered on a commercial flight, chartered flight or on an aircraft operated or paid for by a carrier not licensed by the Federal Aviation Administration to operate for compensation or hire (*i.e.*, a private aircraft). If first-class fare is being provided, or if travel is via chartered or private aircraft, please provide an explanation describing why such travel is warranted:
REGULAR SCHEDULED AIR SERVICE, ECONOMY CLASS

15. I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s). (*signify "yes" by checking box*): ☑

16. I represent that either (*check one of the following*):
a. The trip involves an event that is arranged or organized *without regard* to congressional participation and that meals provided to congressional participants are similar to those provided to or purchased by other event attendees: ☑ or
b. The trip involves events that are arranged or organized *specifically with regard* to congressional participation: ☐
If "b" is checked, detail the cost per day of meals (approximate cost may be provided):

17. Reason for selecting the location of the event or trip: A CARIBBEAN COUNTRY THAT HAS NOT PREVIOUSLY HOSTED THE CONFERENCE

18. Name of hotel or other lodging facility: SANDALS RESORT/REX RESORT

19. Cost per night of hotel or other lodging facility (approximate cost may be provided): $1' 0.00

20. Reason(s) for selecting hotel or other lodging facility: HAS APPROPRIATE MEETING ROOMS

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	320	330	115
For each accompanying family member	320	0	115

	Other Expenses (dollar amount)	Identify Specific Nature of "Other" Expenses (*e.g.*, taxi, parking, registration fee, *etc.*)
For each Member, Officer, or employee		
For each accompanying family member		

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

23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: [signature]

Name and title: KARL B. RODNEY, CEO

Organization: CARIB NEWS FOUNDATION

Address: 7 WEST 36TH STREET, 8TH FLOOR NEW YORK, NY 10016

Telephone number: 212-944-[redacted]

Fax number: 212-944-2089

Email Address: [redacted]@ATT.NET

The Committee staff may contact the above individual above if additional information is required.

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

Committee on Standards of Official Conduct
U.S. House of Representatives
HT-2, The Capitol
Washington, DC 20515
(202) 225-7103 (phone)
(202) 225-7392 (general fax)
(202) 226-7172 (fax for travel approvals)

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

2007 MULTINATIONAL BUSINESS CONFERENCE					
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 Lee					
Gregory Meeks					
Edolphus Towns					
Yvette Clarke					
Maxine Waters					
James Clyburn					
David Scott					
Laura Richardson					
Eleanor Holmes-Norton					
Elijah Cummings					
Diane Watson					
Keith Ellison					
Henry Johnson					
Melvin Watt					
Albert Wynn					
John Lewis					

2007 MULTINATIONAL BUSINESS CONFERENCE
NOVEMEBR 8 -11, 2007
INVITED MEMBERS OF CONGRESS
Sanford Bishop
G. KButterfield
Donna M. Christensen
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Sheila Jackson Lee
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Charles Rangel
Bennie Thompson
Stephanie Tubbs-Jones
Carolyn Kilpatrick
Barbara Lee
Gregory Meeks
Edolphus Towns
Yvette Clarke
Maxine Waters
James Clyburn
David Scott
Laura Richardson
Eleanor Holmes-Norton
Elijah Cummings
Diane Watson
Keith Ellison
Henry Johnson
Melvin Watt
Albert Wynn
John Lewis
Britt Weinstock
George Dalley

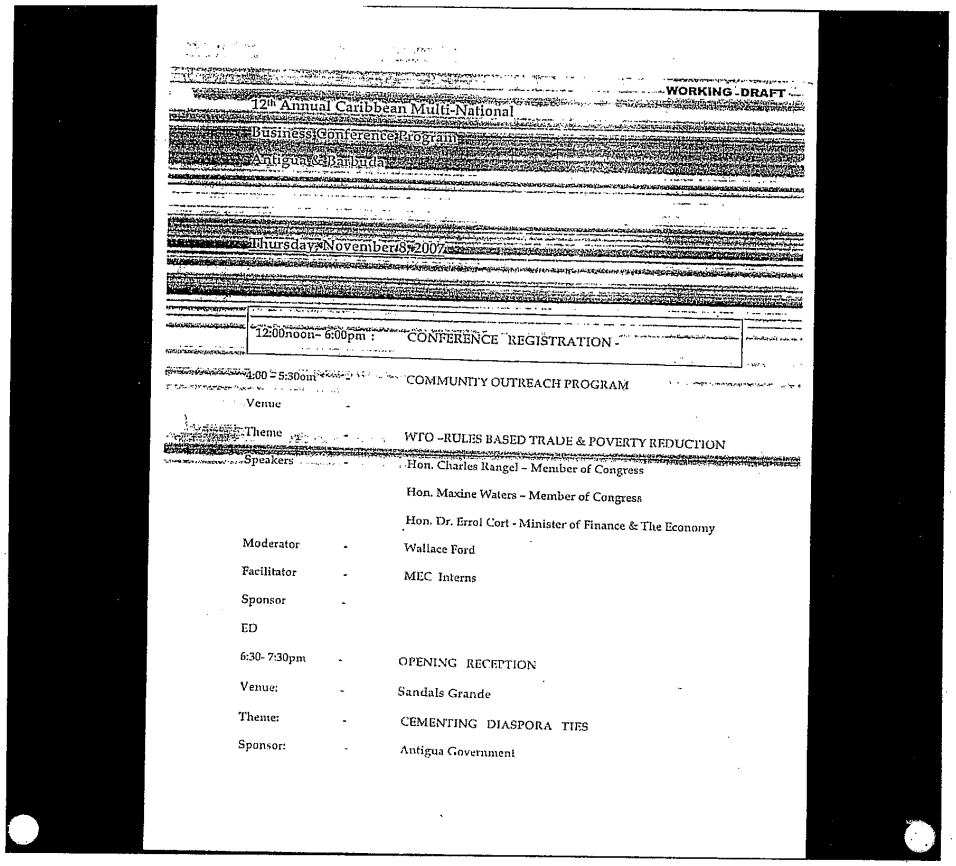
Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10017
Tel: (212) 944-[redacted] Fax: (212) 944-2089
E-mail: [redacted]@caribnewsconference.com

Item #12

CARIB NEWS FOUNDATION is organized to provide educatior 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.

EXHIBIT 19



WORKING - DRAFT

12th Annual Caribbean Multi-National

Business Conference Program

Antigua & Barbuda

Thursday, November 8, 2007

12:00noon – 6:00pm	-	CONFERENCE REGISTRATION -
4:00 – 5:30pm	-	COMMUNITY OUTREACH PROGRAM
Venue	-	
Theme	-	WTO –RULES BASED TRADE & POVERTY REDUCTION
Speakers	-	Hon. Charles Rangel – Member of Congress
		Hon. Maxine Waters – Member of Congress
		Hon. Dr. Errol Cort - Minister of Finance & The Economy
Moderator	-	Wallace Ford
Facilitator	-	MEC Interns
Sponsor	-	
ED		
6:30- 7:30pm	-	OPENING RECEPTION
Venue:	-	Sandals Grande
Theme:	-	CEMENTING DIASPORA TIES
Sponsor:	-	Antigua Government

MC: - Sabrina Hosang

Speakers - Faye A. Rodney – President CARIB NEWS

Hon. Yvette Clarke – Member of Congress

7:30 – 9:30 pm

Venue: - Sandals Grande

Theme: - COLLABORATIVE STRATEGIES

Sponsor: - SANDALS

Moderator: - Hon. Nick Perry, New York State Assemblyman

Speakers - Hon. 'Butch' Stewart, Chairman, Sandals
Hon. Ed Towns – Member of Congress
Hon. Harold Lowell – Minister of Tourism & Aviation

Entertainment :

10:00pm – 1:00am: Hospitality Area

Venue: - Sandals Grande

Sponsors: - Royal Caribbean Bakery

Friday, November 9, 2007

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

9:00am – 6:00pm CONFERENCE REGISTRATION

9:00am – 10:15am - OPENING CEREMONIES

Venue: - Sandals Grande – Main Ballroom

Theme: CEMENTING DIASPORA TIES, COLLABORATIVE STRATEGIES

Sponsor: CITI/PFIZER/MACY'S/AT&T

MC:

Invocation:

Anthems:

Speakers: Eric Eve

Karen Boykin-Towns Greetings

Ed Goldberg

Marie Long

Hazel Dukes - NAACP

Speakers: Hon. Errol Cort – Minister of Finance & The Economy

Hon. Donna Christensen – Member of Congress

Hon. Carolyn Cheeks Kilpatrick – Member of Congress

Ambassador Andrew Young

Hon. Louise Lake Tack - Governor General of Antigua

OR

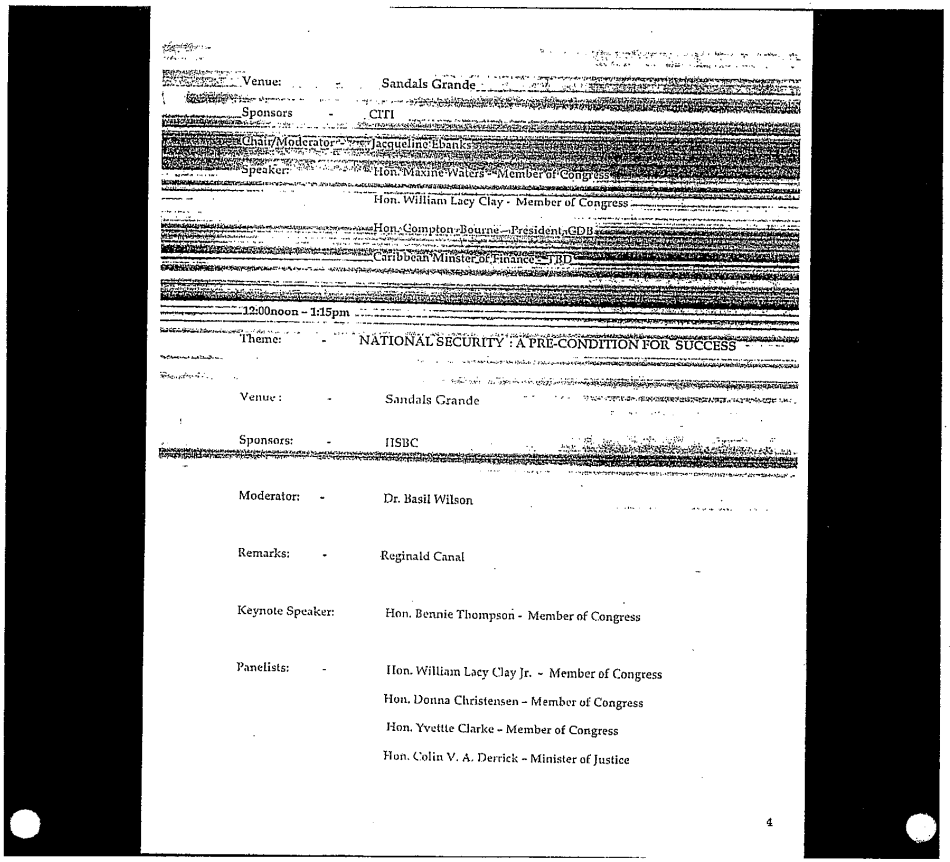
Prime Minister Hon. Baldwin Spencer

Ribbon Cutting

10:30am -11:45am - PRESENTATION

Theme: - DEVELOPMENT BANKS, PRIVATE DEBT AND EQUITY

3



Venue: Sandals Grande

Sponsors - CITI

Chair/Moderator - Jacqueline Banks

Speaker: Hon. Maxine Waters - Member of Congress

Hon. William Lacy Clay - Member of Congress

Hon. Compton Bourne – President, CDB

Caribbean Minister of Finance – TBD

12:00noon – 1:15pm

Theme: - NATIONAL SECURITY : A PRE-CONDITION FOR SUCCESS

Venue : - Sandals Grande

Sponsors: - HSBC

Moderator: - Dr. Basil Wilson

Remarks: - Reginald Canal

Keynote Speaker: Hon. Bennie Thompson - Member of Congress

Panelists: - Hon. William Lacy Clay Jr. - Member of Congress

Hon. Donna Christensen – Member of Congress

Hon. Yvette Clarke – Member of Congress

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

4

[redacted] - Attorney Sanford Rubenstein

[redacted] - 12:00noon-1:15pm

Theme - [redacted] EDUCATION – US AND CARIBBEAN SYNERGIES TO OVERCOME – CHALLENGES

Sponsors - [redacted] IBM

Remarks - [redacted] Marilyn Johnson

Speakers - Dr. Edison O. Jackson, President Medgar Evers College
Hon. Donald Payne - Member of Congress
Hon. Bertrand Joseph
Hon. G. K. Butterfield – Member of Congress

1:30 -2:00 p.m. - LUNCH

Theme - CARIBBEAN TRADE COPMETITIVENESS AND POSITIONING

Venue - Sandals Grande

Sponsors - Goodworks International

Remarks - Carlton Masters

Keynote Speaker - Hon. Billie Miller – Minister of Foreign Affairs & Foreign Trade
Hon. Charles Rangel – Member of Congress

3:00pm – 4:00pm - ROUND TABLES

IMMIGRATION

Venue:

Moderator: Dr. Marco Mason

Speakers: Hon. Sheila Jackson Lee – Member of Congress

Hon. Yvette Clarke – Member of Congress

Hon. Kendall Stewart – City Council member

Sponsor: Royal Caribbean Bakery

DIVERSITY IN GROWTH & DEVELOPMENT

MACY'S – Outside Vendors

Ed Goldberg
Cheryl Monroe
State Senator Kevin Parker
City Council member Al Vann

Sponsor - MACY'S

HAITI – IN TRANSFORMATION

Hon: Maxine Waters – Member of Congress

Hon. Kendrick Meek – Member of Congress

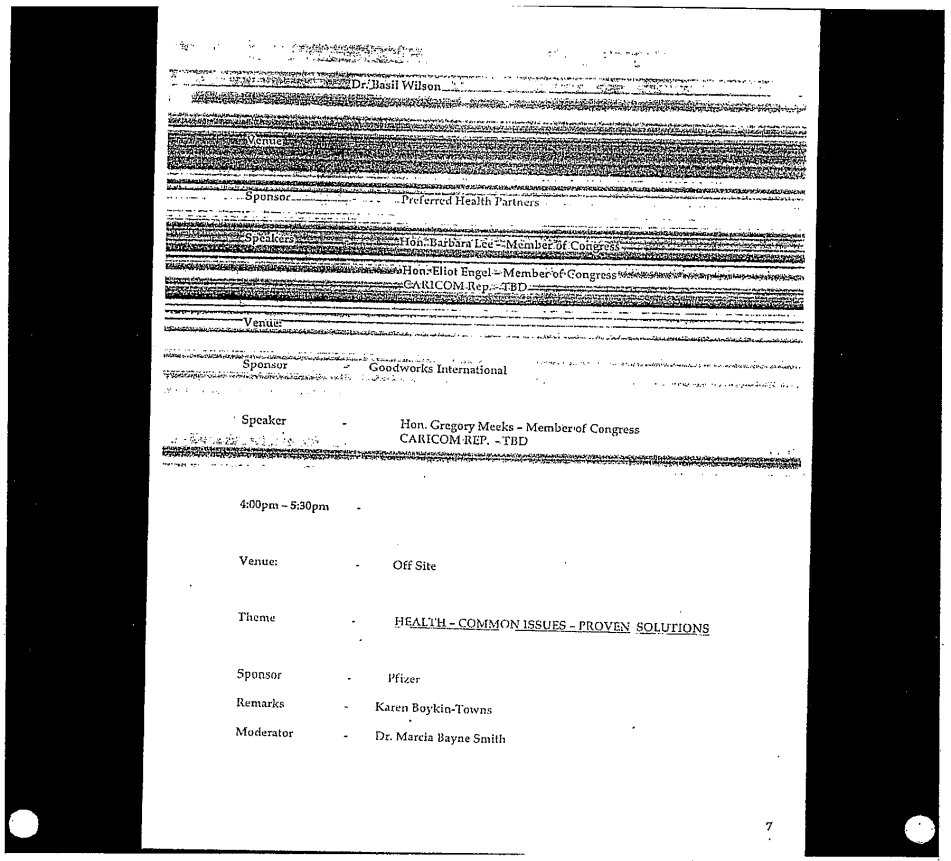
Hon. Yvonne Graham

Preferred Health Partners

PORT & AIRPORT SECURITY – THE MANDATES

Moderator : Lance Ogiste

Hon. Bennie Thompson



Dr. Basil Wilson

Venue

Sponsor - Preferred Health Partners

Speakers - Hon. Barbara Lee – Member of Congress
Hon. Eliot Engel – Member of Congress
CARICOM Rep. – TBD

Venue

Sponsor - Goodworks International

Speaker - Hon. Gregory Meeks – Member of Congress
CARICOM REP. – TBD

4:00pm – 5:30pm -

Venue: - Off Site

Theme - HEALTH – COMMON ISSUES – PROVEN SOLUTIONS

Sponsor - Pfizer

Remarks - Karen Boykin-Towns

Moderator - Dr. Marcia Bayne Smith

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Keynote Speakers: - Dr. Denzil Douglas – Prime Minister St. Kitts/Nevis

Hon. Dr. Donna Christensen – Member of Congress

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

Dr. Dexter McKenzie

- Facilitator - MEC Intern

6:30:00pm – 10:00 pm – HOST COUNTRY EVENING

Hosted by Prime Minister Baldwin Spencer

** MANDATORY FOR ALL MEMBERS OF CONGRESS TO ATTEND

Venue - Off Site

Sponsor : Antigua & Barbuda

10:00pm – 1:00am - Hospitality Area

Venue: - Sandals Grande

Sponsor: - Golden Krust

Saturday, November 10, 2007

8:00am – 10.00am -

Venue: - Sandals Grande

Theme : - WOMEN AND EMPOWERMENT IN THE DIASPORA

Sponsors: - MACYS

[redacted]

Remarks — Brenda Scott – Macy's

MC — Marilyn Johnson

[redacted]

Michele Obama (invited)

Hon. Eddie Bernice Johnson – Member of Congress

Hon. Diane Abbott – Member of Parliament, UK

Baroness Patricia Scotland – Attorney General UK (invited)

Harriett Michel – President NMSDC

Governor General – Dame Louise Lake-Tack

10:15am – 11:45pm - PRESENTATION

Theme - HEALTH – REAL INVESTMENT OPPORTUNITIES IN UPGRADING CARE AND DELIVERY

Venue — Sandals Grande

Sponsors - Pfizer

Greeting - Karen Boykin-Towns – Pfizer

Chair/Moderator - Hon. Yvonne Graham

Keynote - Dr. Denzil Douglas – Prime Minister St. Kitts/Nevis

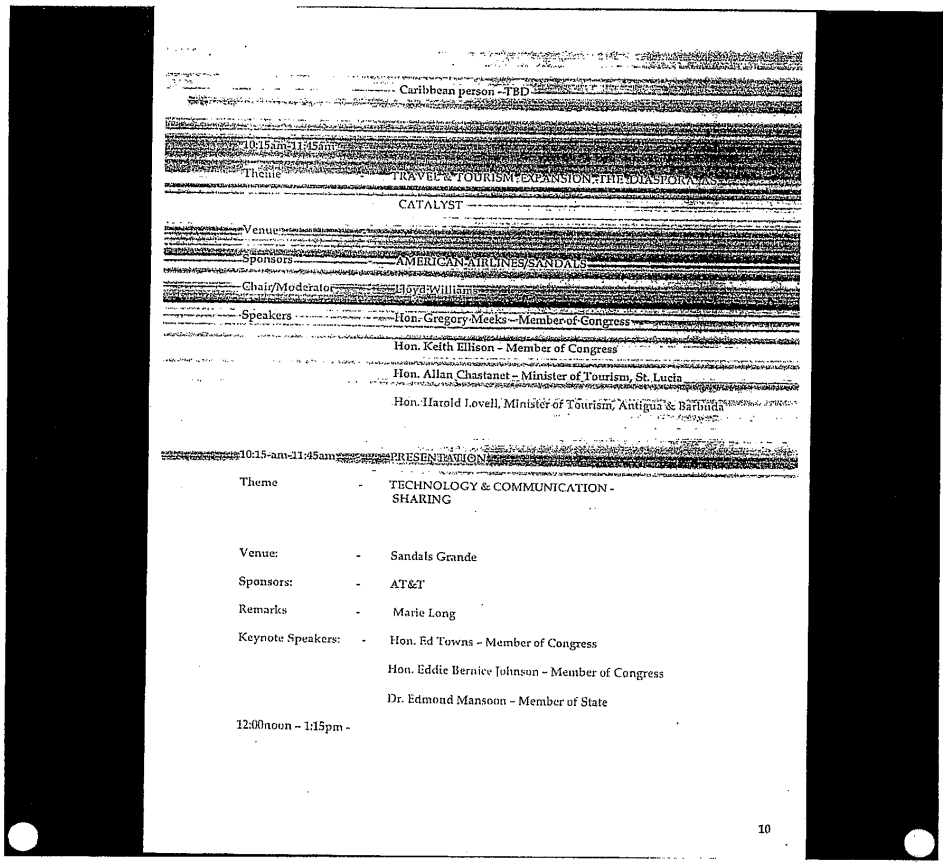
Panelists

Dr. Dexter McKenzie

Hon. Donna Christensen – Member of Congress

Dr. Lesly Kernisant

Dr. Marcia Bayne-Smith



Caribbean person - TBD

10:15am-11:45am

Theme — TRAVEL & TOURISM EXPANSION: THE DIASPORA AS CATALYST

Venue

Sponsors — AMERICAN AIRLINES/SANDALS

Chair/Moderator — Lloyd Williams

Speakers — Hon. Gregory Meeks – Member of Congress

Hon. Keith Ellison – Member of Congress

Hon. Allan Chastanet – Minister of Tourism, St. Lucia

Hon. Harold Lovell, Minister of Tourism, Antigua & Barbuda

10:15-am-11:45am — PRESENTATION

Theme - TECHNOLOGY & COMMUNICATION - SHARING

Venue: - Sandals Grande

Sponsors: - AT&T

Remarks - Marie Long

Keynote Speakers: - Hon. Ed Towns – Member of Congress

Hon. Eddie Bernice Johnson – Member of Congress

Dr. Edmond Mansoon – Member of State

12:00noon – 1:15pm -

10

Theme - INTEGRATING THE DIASPORA IN BUSINESS - INVESTORS MANAGERS, MENTORS & TRAINERS

Venue - Sandals Grande

Sponsor - HSBC

Remarks - [illegible]

Speakers - Hon. Compton Bourne

[illegible]

Hon. Carolyn Cheeks-Kilpatrick – Member of Congress

Hon. Kendrick Meek – Member of Congress

Hon. William Lacy Clay Jr. – Member of Congress

1:30pm -2:30pm - LUNCH

Theme - FINANCE/COMMUNITY/ORGANIZATIONS – VALUE AND ROLE

Sponsors: - CITI

Remarks - Michael Flanigan

Speakers - Eric Eve – CITI

Hon. William Thompson, New York City Comptroller

2:30pm – 6:30pm

Optional:

3:00pm – 4:00pm - ROUND TABLE

Venue -

Round Table #1

Theme - CARIBBEAN: A COMPETITIVE HEALTHCARE DESTINATION

Venue -

Sponsors - Preferred Healthcare

Remarks - Dr. Lesly Germain

Speakers - Dr. Dexter McKenzie

Dr. Lorna McBarnette

Round Table#2

Theme - HEMISPHERIC DISASTER FUND

Speakers - Hon. Danny Davis – Member of Congress

Hon. Yvette Clarke – Member of Congress

Dr. Roy Hastick

Venue -

Sponsor -

Round Table#3

Theme - CLOSING THE GENERATION GAP

Hon. Kendrick Meek – Member of Congress

Karlisa Rodney

Lita Balram

Sabrina Hosang

Winthrope Wellington

Venue

Sponsor

Round Table #4

Theme PASSPORT & ADMINISTRATIVE CONSTRAINTS ON TOURISM

Venue

Sponsor : American Airlines

Speakers : Hon. Gregory Meeks – Member of Congress
Hon. Harold Lowell - Minister of Tourism
Mr. Lloyd Williams

Sponsor : CARIB NEWS

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

[redacted]

Facilitator MEC intern

E D

6:30 - 7:30pm GALA RECEPTIONS

Venue:

Sponsor AT&T – HSBC

Speaker Hon. Billie Miller, Minister of Foreign Affairs, Minister of Government .. Antigua

Theme:

7:30 – 10:00 pm : GALA DINNER & AWARDS

Theme

Venue :

Sponsors CITI/MACY'S/PFIZER

Speakers : Hon. Charles Rangel – Member of Congress

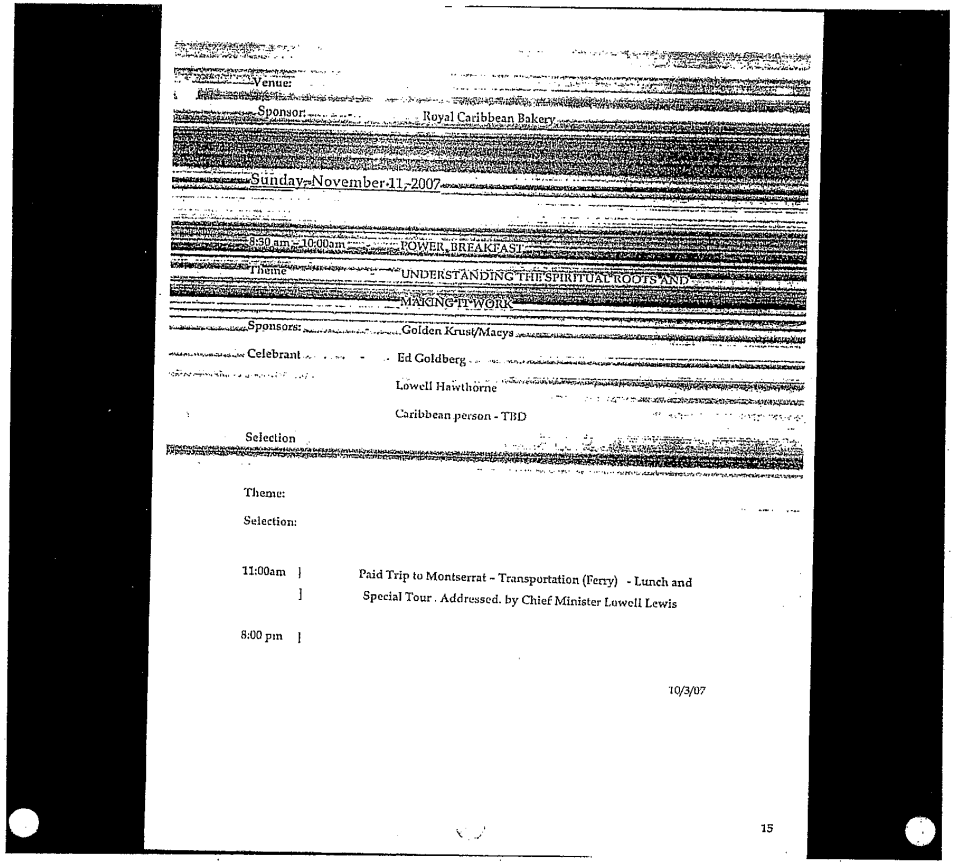
Hon. James Clyburn – Member of Congress

Keynote Speaker : Prime Minister Hon. Baldwin Spencer

Presentation of the Marcus Garvey "Bridge Builder" Awards

Hospitality Area

10:30pm – 1:00am



Venue:

Sponsor: Royal Caribbean Bakery

Sunday, November 11, 2007

8:30 am - 10:00am POWER BREAKFAST

Theme UNDERSTANDING THE SPIRITUAL ROOTS AND MAKING IT WORK

Sponsors: Golden Krust/Macys

Celebrant - Ed Goldberg

Lowell Hawthorne

Caribbean person - TBD

Selection

Theme:

Selection:

11:00am] Paid Trip to Montserrat – Transportation (Ferry) - Lunch and
] Special Tour . Addressed. by Chief Minister Lowell Lewis

8:00 pm]

10/3/07

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OFF-PUBLIC SCHEDULE – MANDATORY FOR EMBERS OF CONGRESS

5:30 – 6:30 p.m. – Private Welcome Reception with Governor General

11:00 a.m.–1:00pm – Closed Door Meeting
(Mandatory for all Members)
Prime Ministers & Ministers of Government
with Members of Congress
Secretary of State Condoleezza Rice (invited)

5:30pm – 6:30pm - Private Meeting with Local Elected Officials and
the Business Community

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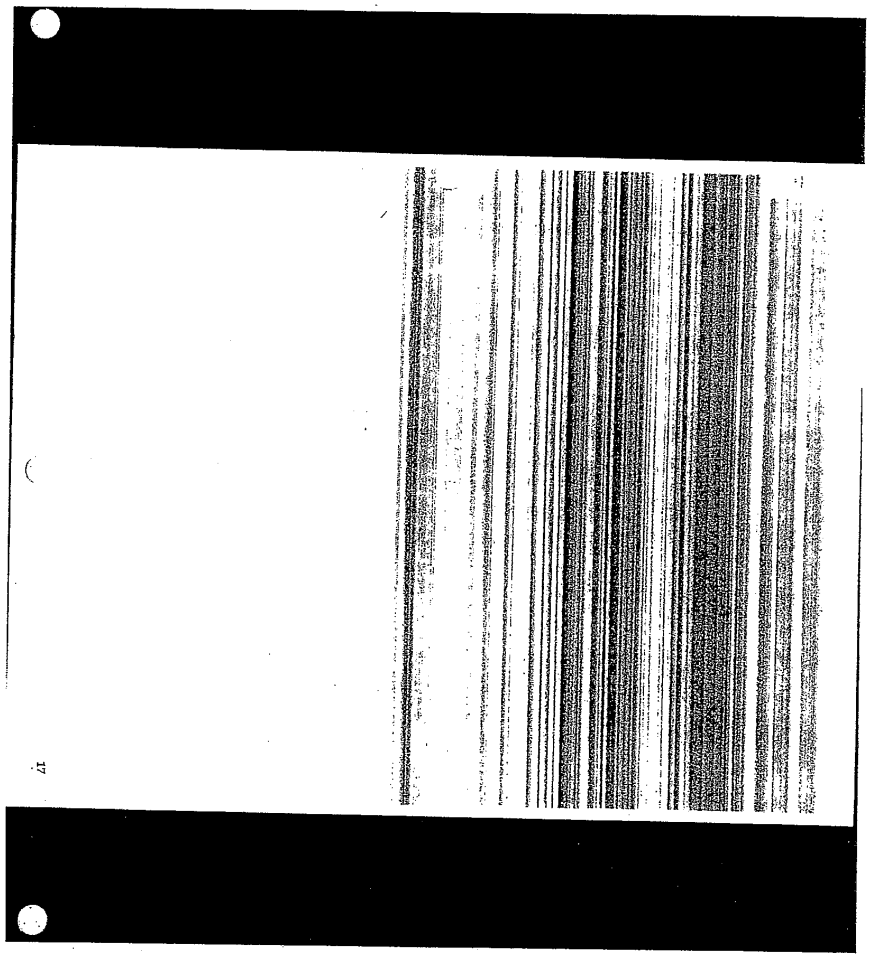

EXHIBIT 20

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:

1. 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.

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.

7. 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

EXHIBIT 21

Updated Schedule
for Carib News

WORKING DRAFT 10/22

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

Thursday, November 8, 2007

12:00noon – 6:00pm :		CONFERENCE REGISTRATION –
5:00 – 6:30pm	–	COMMUNITY OUTREACH PROGRAM
Venue	–	Multi-Purpose Cultural Centre – Perry Bay, St. John's
Theme	–	WTO –RULES BASED TRADE & POVERTY REDUCTION
Speakers	–	Hon. Charles Rangel – Member of Congress
		Hon. Maxine Waters – Member of Congress
		Hon. Dr. Errol Cort - Minister of Finance & The Economy
Moderator	–	Tony Best
6:30-7:30pm	–	OPENING RECEPTION
Venue:	–	Sandals Grande – Main Ballroom
Theme:	–	CEMENTING DIASPORA TIES
MC:	–	Judge Sylvia Hinds-Radix
Speakers	–	Faye A. Rodney – President CARIB NEWS
		Hon. Yvette Clarke – Member of Congress
7:30 – 9:30 pm	–	
Theme:	–	COLLABORATIVE STRATEGIES

Venue: - Sandals Grande – Main Ballroom

Moderator - Hon. Nick Perry, New York State Assemblyman

Speakers - Hon. 'Butch' Stewart, Chairman, Sandals
Hon. Ed Towns – Member of Congress
Hon. Harold Lovell – Minister of Tourism & Aviation

10:00pm – 1:00am - Hospitality Area

Venue: Sandals Grande – Reflective Pool

Friday, November 9, 2007

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

9:00am – 6:00pm	CONFERENCE REGISTRATION

9:00am – 10:15am - OPENING CEREMONIES

Venue: - Sandals Grande – Main Ballroom

Theme: - CEMENTING DIASPORA TIES, COLLABORATIVE STRATEGIES

Remarks:
- Eric Eve
Dr. Lowell Lewis, Chief Minister Montserrat
Karen Boykin-Towns
Ed Goldberg
Marie Long
Hazel Dukes – NAACP
William Thompson, NYC Comptroller
Commissioner Sarah Wescot-Williams, Leader of Govt. St. Maarten
Greetings

Speakers: Hon. Errol Cort – Minister of Finance & The Economy
Hon. Donna Christensen – Member of Congress
Hon. Carolyn Cheeks Kilpatrick – Member of Congress

Ambassador Andrew Young
Hon. Louise Lake Tack - Governor General of Antigua
OR
Prime Minister Hon. Baldwin Spencer

Ribbon Cutting

10:30am -11:45am	-	PRESENTATION
Theme:	-	DEVELOPMENT BANKS, PRIVATE DEBT AND EQUITY
Venue:	-	Sandals Grande
Chair/Moderator	-	Dr. Enrique Riggs
Speaker:		Hon. Maxine Waters - Member of Congress
		Hon. Compton Bourne – President, CDB
		Mr. Milton Lawrence, Chairman Financial Services Corporation
		Mr. Rudolph Carryl
		Hon. Dr. Denzil Douglas, Prime Minister/Minister of Finance, St. Kitts
10:30 – 11.45am		CULTURE – PROMISE & POTENTIAL IN BUSINESS
Remarks :	-	
Speaker:		Professor Rex. Nettleford
		Hon. Howard Dotson
		Patrick Payne
		Hon. Harold Lovell, Minister of Culture
12:00noon – 1:15pm		
Theme:	-	NATIONAL SECURITY : A PRE-CONDITION FOR SUCCESS
Venue :	-	Sandals Grande
Moderator:	-	Leyland Hazlewood
Remarks:	-	Reginald Canal

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Keynote Speaker:	Hon. Bennie Thompson - Member of Congress
Panelists:	Hon. Dwyer Astaphan, Minister of National Security
	Hon. Yvette Clarke – Member of Congress
	Hon. Colin V. A. Derrick – Minister of Justice
	Attorney Sanford Rubenstein
12:00noon -1:15pm	
Theme -	EDUCATION – U. S AND CARIBBEAN SYNERGIES TO OVERCOME CHALLENGES
Remarks -	Colin Ward
Speakers -	Dr. Edison O. Jackson, President Medgar Evers College
	Hon. Donald Payne - Member of Congress
	Hon. Bertrand Joseph, Minister of Education
1:30pm -2:30pm -	LUNCH
Theme: -	FINANCE COMMUNITY ORGANIZATION'S – VALUE AND ROLE
Remarks -	Michael Flanigan
Speakers -	Eric Ive – CITI
	Hon. William Thompson, New York City Comptroller
3:00pm – 6:00pm -	ROUND TABLES
	IMMIGRATION -
Venue: -	Sandals Grande
Moderator -	Dr. Marco Mason

Speakers – Hon. Barbara Lee – Member of Congress

Hon. Yvette Clarke – Member of Congress

Hon. Kendall Stewart – City Council member

DIVERSITY IN GROWTH & DEVELOPMENT

MACY'S – Outside Vendors

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

HAITI – IN TRANSFORMATION

Hon. Maxine Waters – Member of Congress

Hon. Yvonne Graham

Ambassador Andrew Young

PORT & AIRPORT SECURITY – THE MANDATES

Moderator : Mr. Lance Ogiste

Hon. Bennie Thompson

Hon. Dwer Aslaphan

Venue Sandals Grande

Participant – Preferred Health Partners

Speakers – Hon. Barbara Lee – Member of Congress

Venue: –

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Speaker - Hon. Gregory Meeks – Member of Congress ?
CARICOM REP. - TBD

5:00pm – 6:30pm -

Venue: - Multipurpose Cultural & Exhibition Center – Perry Bay

Theme - HEALTH – COMMON ISSUES – PROVEN SOLUTIONS – MOVE

Healthy Eating, Healthy Living

Remarks - Ms. Karen Boykin-Towns

Moderator - Dr. Marcia Bayne Smith

Keynote Speakers: - Dr. Denzil Douglas – Prime Minister St. Kitts/Nevis

Hon. Dr. Martin Valdes-Preferred Health Partners

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

Dr. John Palmer

Hon. Diane Watson, Member of Congress

6:30:00pm – 10: 00 pm - HOST COUNTRY EVENING

Hosted by Prime Minister Baldwin Spencer

Venue - Multipurpose Cultural and Exhibition Centre – Perry Bay

10:00pm – 1:00am - Hospitality Area

Venue: - Sandals Grande – Reflection Pool

6

Saturday, November 10, 2007

8:00am – 10.00am –

Venue: – Sandals Grande – Main Ballroom

Theme: – WOMEN AND EMPOWERMENT IN THE DIASPORA

Remarks – Brenda Scott

MC – Marilyn Johnson

Speakers – Hon. Diane Abbott, MP UK

Commissioner Sarah Westcot-Williams,

Hon. Caroline Checks Kilpatrick, Member of Congress

Hon. Eddie Bernice Johnson – Member of Congress

Dr. Mamella Maxwell

Ms. Toni Fay

Governor General – Dame Louise Lake Tack – check

Ms. Lucille McEwen, President/CEO HCCI

Commissioner Wescot-Williams, Leader of Government

10:15am – 11:45pm – PRESENTATION

Theme – HEALTH – REAL INVESTMENT OPPORTUNITIES IN UPGRADING CARE AND DELIVERY

Venue – Sandals Grande

Greeting – Karen Boykin-Towns – Pfizer

Chair/Moderator – Hon. Yvonne Graham

Keynote – Dr. Denzil Douglas – Prime Minister St. Kitts/Nevis

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Panelists		Hon. John Herbert McGinley, Minister of Health
		Dr. Marcia Bayne-Smith
		Dr. Carl Kenel Pierre, Preferred Health Partners
10:15am-11:45am	-	
Theme	-	TRAVEL & TOURISM EXPANSION -THE DIASPORA AS CATALYST
Venue	-	Sandals Grande
Chair/Moderator	-	Mr. Lloyd Williams, CHCC
Speakers	-	Hon. Laura Richardson – Member of Congress
		Hon. Harold Lovell, Minister of Tourism, Antigua & Barbuda
		Hon. Howard Dotson, Director Schomburg Center
12 noon-1.15pm	-	PRESENTATION
Theme	-	TECHNOLOGY & COMMUNICATION - SHARING
Venue:	-	Sandals Grande
Remarks	-	Ms. Marie Long
Keynote Speakers:	-	Hon. Ed Towns – Member of Congress
		Hon. Eddie Bernice Johnson – Member of Congress
		Dr. Edmond Mansour – Member of State
		Dr. Emmanuel Gonsalves
12:00noon – 1:15pm	-	
Theme	-	INTEGRATING THE DIASPORA IN BUSINESS – INVESTORS MANAGERS, MENTORS & TRAINERS

8

Venue - Sandals Grande

Moderator - Roy Hastick

Participant - HSBC

Remarks - Mr. Javier Evans

Speakers - Hon. Compton Bourne

Hon. Adolfo Carrion, Bronx Borough President

Hon. Carolyn Cheeks Kilpatrick – Member of Congress

Hon. Professor Rex Nettleford

1:30 -2:00 p.m. - LUNCH

Theme - CARIBBEAN TRADE COMPETITIVENESS AND POSITIONING

Venue - Sandals Grande

Remarks - Wallace Ford – Goodworks International

Keynote Speaker - Hon. Billie Miller – Minister of Foreign Affairs & Foreign Trade

Hon. Charles Rangel – Member of Congress

2:30pm – 6:30pm

Optional:

5:00pm – 6:00pm - ROUND TABLE

Venue : Sandals Grande

Round Table #1

Theme : CARIBBEAN – A COMPETITIVE HEALTH CARE DESTINATION

Venue

Remarks : Dr. Lesly Kernisant

Speakers : Dr. Dexter McKenzie

Hon. Yvonne Graham

Round Table#2 -

Theme - HEMISPHERIC DISASTER FUND

Venue - Sandals Grande

Speakers Hon. Yvette Clarke – Member of Congress

Mr. Leyland Hazlewood

Mr. Emmanuel Gonsalves

Participant -

Round Table#3

Theme - CLOSING THE GENERATION GAP

Speaker - Hon. Yvette Clarke – Member of Congress

Karlisa Rodney

Lita Balram

Sabrina Hosang

Winthrope Wellington

Venue - Sandals Grande

Participant -

Round Table #4

Theme : PASSPORT & ADMINISTRATIVE CONSTRAINTS ON TOURISM

Venue : Sandals Grande

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

5:00pm - 6:30pm - COMMUNITY OUTREACH -

EDUCATION & YOUTH DIRECTION - ACCESS AND COLLABORATION

Venue: - Multipurpose Cultural & Exhibition Center

Moderator: - Michael Flanigan

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

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

Hon. Eddie Bernice Johnson - Member of Congress

Hon. Bertrand Joseph

6:30 - 7:30pm - GALA RECEPTION

Venue: Sandals Grande

Speaker - Hon. Stephanie Tubbs-Jones, Member of Congress

Hon. Billie Miller, Minister of Foreign Affairs,

Minister of Government .. Antigua

Theme:

11

7:30 – 10:00 pm : GALA DINNER & AWARDS

Theme :

Venue : Sandals Grande – Main Ballroom

Speakers : Hon. Charles Rangel – Member of Congress

Hon. Maxine Waters – Member of Congress

Keynote Speaker : Prime Minister Hon. Baldwin Spencer

Presentation of the Marcus Garvey "Bridge Builder" Awards

Hospitality Area

10:30pm – 1:00am

Venue:

Sunday, November 11, 2007

8:30 am – 10:00am - POWER BREAKFAST

Theme - UNDERSTANDING THE SPIRITUAL ROOTS AND MAKING IT WORK

Celebrant - Ed Goldberg

Lowell Hawthorne

Caribbean person - TBD

Selection

Theme:

Selection:

EXHIBIT 22

CONFIDENTIAL

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

OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES

Memorandum of Interview

In Re:	Staff Member 1 of Congressman Rangel's Office
Review #:	09-6333; 09-2567; 09-4403; 09-3698; 09-2222
Date:	May 27, 2009 and May 28, 2009
Location:	Washington, DC (via telephone on May 27, 2009) and at Rayburn HOB 354 (on May 28, 2009)
Time:	4:10pm to 5:30 p.m. (approximately) and 3:30pm to 4:00pm (approximately)
Participants:	Leo Wise Omar Ashmawy

Summary: Staff Member 1 of Congressman Rangel's Office is currently the chief of staff of Representative Charles Rangel, a Member of the United States House of Representatives representing the Fifteenth District of New York. He was interviewed pursuant to Review 09-2567; 09-4403; 09-3698; 09-6333; and 09-2222. We requested an interview with Staff Member 1 of Congressman Rangel's Office and he consented to an interview. Staff Member 1 of Congressman Rangel's Office's counsel was present. Staff Member 1 of Congressman Rangel's Office made the following statements in response to our questioning:

1. Staff Member 1 of Congressman Rangel's Office was given an 18 U.S.C. § 1001 warning and consented to an interview. Staff Member 1 of Congressman Rangel's Office signed a written acknowledgement of the warning.
2. Staff Member 1 of Congressman Rangel's Office did not attend the 13th Annual Caribbean Multi-National Business Conference although he received an invitation. In response to a Request for Information by OCE, Staff Member 1 of Congressman Rangel's Office looked for Representative Rangel's invitation to the conference, but could not find it. He had thought Representative Rangel had received one, but because he could not find the invitation he now thinks that Representative Rangel did not receive one.
3. Representative Rangel could have been invited orally as he has been attending the conference for years and was seen almost as a partner. He attends the conference because

he is dedicated to strengthening the relationships between the Caribbean community, the African-American community of New York City and in general, and the United States.

4. The question of whether Representative Rangel would attend the conference in 2008 was a difficult one because of the negative press he had received throughout the preceding summer. Representative Rangel was cautious about attending because he didn't want to be a target for additional negative publicity, but Staff Member 1 of Congressman Rangel's Office and others on the Member's staff argued that he should go to the conference. They argued that if Representative Rangel did not attend he would be rejecting the friends with whom he helped build the conference and that the Member had to stand up and do the right thing despite the possible negative publicity.

5. Ultimately, Staff Member 1 of Congressman Rangel's Office and his staff persuaded the Member to attend. Representative Rangel decided to keep a low profile and, unlike in past years, staff would not attend the conference with the Member.

6. Staff Member 1 of Congressman Rangel's Office stated that the CaribNews Foundation invited the Member. The CaribNews Foundation is the charitable arm of the newspaper. When the rules changed in 2007 and corporations could not be involved as before – i.e. direct contributions to the conference – there was "talk" about how to do the conference in light of the new rules.

7. According to Staff Member 1 of Congressman Rangel's Office, there was "talk" that the Rodneys needed an entity to create a common fund so that the corporate money could be used to pay for the conference and that the CaribNews Foundation could be used for that purpose.

8. Staff Member 1 of Congressman Rangel's Office initially stated that he did not remember how he was aware of this "talk." He stated that part of it was his reading of the rules and the supplemental material about how things get done. He then stated that "we" celebrated when Representative Susan Tubbs-Jones was made the chair of the Standards Committee in 2007 because she would try to create a way for Members of Congress to continue to attend the conference. Staff Member 1 of Congressman Rangel's Office then stated that he was made aware of the "talk" through the Rodneys and that the Rodneys told Staff Member 1 of Congressman Rangel's Office that Representative Tubbs-Jones was going to have her counsel, Dawn Kelly-Mobley, find a way to make the conference work. The Members would have a few more hoops to go through but "we" would find a 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.

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.

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.

25. Staff Member 1 of Congressman Rangel's Office recalled a conversation with Representative Carolyn Kilpatrick's chief of staff, Kim Rudolph. Ms. Rudolph addressed the comments that Representative Kilpatrick made in which she thanked the sponsors of the conference. Staff Member 1 of Congressman Rangel's Office explained Representative Kilpatrick's statements to OCE by saying that that regardless of who the real sponsor of the event was, when Members thank the corporations it helps the Rodneys put on the conference -- even if the sponsors are not sponsors under the rule. Staff Member 1 of Congressman Rangel's Office also remembered speaking to Shelly Thomas, Delegate Donna Christensen's scheduler, but did not recall the specifics of the conversation.

26. Staff Member 1 of Congressman Rangel's Office was not aware of any limits on a private foundation paying for overseas travel. He did not know whether the CaribNews Foundation was a private foundation or a public charity.

27. Staff Member 1 of Congressman Rangel's Office was shown a copy of Congressman Rangel's itinerary and a receipt for an electronic ticket. Staff Member 1 of Congressman Rangel's Office stated that he did not remember seeing it before, but that the itinerary was the type of document that would typically be placed in the Congressman's briefing book so that he could provide the information at the airport in order to get his ticket. Staff Member 1 of Congressman Rangel's Office also pointed out that the receipt for the electronic ticket was the sort of document that would only be provided after the Congressman checked in for his flight.

I prepared this Memorandum of Interview on May 28, 2009 after interviewing Staff Member 1 of Congressman Rangel's Office on May 27, 2009. I certify that this memorandum contains all pertinent matter discussed with Staff Member 1 of Congressman Rangel's Office on May 27, 2009.

Omar Ashmawy
Investigative Counsel

EXHIBIT 23

THE NEW YORK CARIB NEWS
THE WEEKLY VOICE OF THE CARIBBEAN-AMERICAN COMMUNITY
7 WEST 36TH STREET, #8 FLOOR, NEW YORK, NY 10018

TEL: (212) 944-[redacted] FAX: (212) 944-2089
E-MAIL ADDRESS: [redacted]@AOL.COM;
[redacted]@ATT.NET

FACSIMILE TRANSMITTAL SHEET

TO: Kelly Mobley	FROM: Patricia Louis
COMPANY: Committee on Standards of official conduct	DATE: 8/20/08
FAX NUMBER: 202-225-7392	TOTAL NO. OF PAGES INCLUDING COVER:

RE: 2008 MULTINATIONAL BUSINESS CONFERENCE

☐ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ YOUR INFORMATION

Following is the completed form and attachments re travel for Members of Congress to attend the 2008 Multinational Business Conference scheduled for November 6-9, 2008 in St. Maarten.

Regards

Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10017
Tel: (212) 944-[redacted] Fax: (212) 944-2089
E-mail: [redacted]@caribnewsconference.com

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

The participants are selected to participate in the various workshops during the Conference based on their demonstrated interest, expertise and assignment in the United States Congress.

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

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

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM
(provide directly to each House invitee)

This form should be completed by private entities offering to provide travel or reimbursement for travel to House Members, officers or employees under House Rule XXV, clause 5. A completed copy of the form (and any attachments) should be provided to each invited House Member, officer or employee, who will then forward it to the Committee. The trip sponsor should NOT submit the form directly to the Committee.

Private sponsors are urged to submit this form to each House invitee at least 30 days before travel is scheduled to begin. The failure to provide the Committee with adequate time to review the form and attachments may result in the invitee not receiving approval for the trip. The submission of an incomplete form will delay the review process. Before completing this form, sponsors are urged to *carefully review* the Committee's private travel guidelines and advisory memoranda detailing the rules and restrictions for private travel, as well as the instructions for completing this form. Sponsors should call the Committee with any questions prior to submitting the form. *Please type form.*

1. Sponsor(s) (who will be paying for the trip): CARIB NEWS FOUNDATION

2. I represent that the trip will not be financed (in whole or in part) by a federally-registered lobbyist or a registered foreign agent (*signify "yes" by checking box*): ☑

3. I represent that the trip sponsor(s) has not accepted from any other source funds earmarked directly or indirectly to finance any aspect of the trip (*signify "yes" by checking box*): ☑

4. Is travel being offered to an accompanying family member of the House invitee(s)? ☑ Yes ☐ No

5. Provide names and titles of ALL House invitees; for each invitee, provide explanation of why the individual was invited (include additional pages if necessary): BASED ON COMMITTEE OR SUB-COMMITTEE WHICH IMPACTS US/CARIBBEAN RELATIONS ON WHICH THE MEMBER SERVES,

6. Dates of travel: NOVEMBER 6-9, 2008

7. Cities of departure – destination – return: VARIES - DEPENDING ON MEMBER

8. Attached is a detailed agenda of the activities taking place during the travel (*i.e.*, an hourly description of planned activities) (*signify "yes" by checking box*): ☑

9. I represent that (*check one of the following*):
   a. The sponsor of the trip is an institution of higher education within the meaning of section 101 of the Higher Education Act of 1965: ☐ or
   b. The sponsor of the trip does not retain or employ a federally registered lobbyist or registered foreign agent: ☑ or
   c. The trip is for attendance at a one-day event *and* lobbyist involvement in planning, organizing, requesting, or arranging the trip was *de minimis* under the Committee's travel regulations. ☐

10. If travel is for participation in a one-day event (*i.e.*, if you checked Question 9(c)), check one of the following:
    a. One-night's lodging and meals are being offered: ☐ or
    b. Two-nights' lodging and meals are being offered: ☐
    If "b" is checked, explain why the second night is warranted:

11. If the trip is not sponsored by an institution of higher education, I represent that a federally-registered lobbyist or foreign agent will not accompany House Members or employees on any segment of the trip (*signify "yes" by checking box*): ☑

12. Private sponsors must have a direct and immediate relationship to the purpose of the trip or location being visited. Describe the role of each sponsor in organizing and conducting the trip:
CARIB NEWS FOUNDATION (* SEE ATTACHED)

13. Describe each sponsor's organizational interest in the purpose of the trip:
THE INTEREST OF CARIB NEWS 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 aircraft, please indicate if travel is being offered on a commercial flight, chartered flight or on an aircraft operated or paid for by a carrier not licensed by the Federal Aviation Administration to operate for compensation or hire (*i.e.*, a private aircraft). If first-class fare is being provided, or if travel is via chartered or private aircraft, please provide an explanation describing why such travel is warranted:
REGULAR SCHEDLED AIR SERVICE, ECONOMY CLASS

15. I represent that the expenditures related to local area travel during the trip will be unrelated to personal or recreational activities of the invitee(s). (*signify "yes" by checking box*): ☑

16. I represent that either (*check one of the following*):
    a. The trip involves an event that is arranged or organized *without regard* to congressional participation and that meals provided to congressional participants are similar to those provided to or purchased by other event attendees: ☑ or
    b. The trip involves events that are arranged or organized *specifically with regard* to congressional participation: ☐
    If "b" is checked, detail the cost per day of meals (approximate cost may be provided):

17. Reason for selecting the location of the event or trip: SEE ATTACHED

18. Name of hotel or other lodging facility: SONESTA MAHO BEACH RESORT .

19. Cost per night of hotel or other lodging facility (approximate cost may be provided): $110.00

20. Reason(s) for selecting hotel or other lodging facility: HAS APPROPRIATE MEETING ROOMS

21. TOTAL EXPENSES FOR EACH PARTICIPANT:

☐ 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 Local transportation
For each accompanying family member		

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

23. I certify that the information contained in this form is true, complete, and correct to the best of my knowledge.

Signature: [signature]

Name and title: KARL B. ROONEY, CEO

Organization: CARIB NEWS FOUNDTION

Address: 7 WEST 36th STREET, 8th FLOOR, NEW YORK, NY 10018

Telephone number: (212) 944-[redacted]

Fax number: (212) 944-2089

Email Address: [redacted]@ATT.NET

The Committee staff may contact the above individual above if additional information is required.

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

Committee on Standards of Official Conduct
U.S. House of Representatives
HT-2, The Capitol
Washington, DC 20515
(202) 225-7103 (phone)
(202) 225-7392 (general fax)
(202) 226-7172 (fax for travel approvals)

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

MEMBERS OF CONGRESS INVITED TO THE
THIRTEENTH ANNUAL MULTI-NATIONAL BUSINESS
CONFERENCE, NOVEMBER 6-9, 2008, ST. MAARTEN, N.A.

Congresswoman Diane E. Watson
Congressman David Scott
Congressman James Clyburn
Congresswoman Nydia Velazquez
Congressman Charles Rangel
Congressman Donald Payne
Congresswoman Donna M. Christensen
Congressman Edolphus Towns
Congressman G. K. Butterfield
Congressman Gregory Meeks
Congressman Jesse Jackson Jr.
Congressman Keith Ellison
Congressman Kendrick Meek
Congresswoman Maxine Waters
Congressman Melvin Watt
Congressman Robert Scott
Congressman William Lacy Clay
Congresswoman Barbara Lee
Congresswoman Caroline Cheeks Kilpatrick
Congresswoman Corrine Brown
Congresswoman Eddie Bernice Johnson
Congresswoman Sheila Jackson Lee
Congresswoman Yvette Clarke
Congressman Danny Davis
Congressman Bennie Thompson
Congresswoman Laura Richardson

July 2008

Carib News Foundation
7 West 36th Street, 8th floor, New York, NY 10017
Tel: (212) 944-[redacted] Fax: (212) 944-2089
E-mail: [redacted]@caribnewsconference.com

Item #12

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

The participants are selected to participate in the various workshops during the Conference based on their demonstrated interest, expertise and assignment in the United States Congress.

Item#17

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

MEMBERS OF CONGRESS INVITED TO THE
13th Annual Multinational Business Conference
St. Maarten, November 6-9, 2008

Congressman William Lacy Clay
U.S House of Representatives
131 Cannon HOB
Washington, DC 20515
Phone: 202-225-[redacted]
Fax: 202-226-3717

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

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

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

Congressman James Clyburn
US House of Representatives
2135 Rayburn HOB
Washington, DC 20515
Phone: 202-225-[redacted]
Fax: 202-225-9253

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

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

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

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

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

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

Congressman G. K. Butterfield
U.S House of Representatives
413 Cannon HOB
Washington, DC 20515
Phone: 202-225-[redacted]
Fax: 202-225-2256

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

Congressman Jesse Jackson Jr.
U.S House of Representatives
2419 Rayburn HOB
Washington, DC 20515
Phone: 202-225-[redacted]
Fax: 202-225-0899

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

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

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

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

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

Congresswoman Caroline Cheeks Kilpatrick
U.S House of Representatives
1610 Longworth HOB
Washington, DC 20515
Phone: 202-225-[redacted]
Fax: 202-225-5730

Congresswoman Corrine Brown
U.S House of Representatives
2444 Rayburn HOB
Washington, DC 20515
Phone: 202-225-[redacted]
Fax: 202-225-2256

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

Congresswoman Sheila Jackson Lee
U.S House of Representatives
410 Canon HOB
Washington, DC 20515
Phone: 202-225-[redacted]
Fax: 202-225-3317

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

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

Congresswoman Stephanie Tubbs-Jones
U.S House of Representatives
1516 Longworth HOB
Washington, DC 20515
Phone: 202-225-[redacted]
Fax: 202-2256-1539/2367

Congressman Bennie Thompson
US House of Represntatives
2432 Rayburn HOB
Washington, DC 20515
Phone: 202-225-[redacted]
Fax: 202-225-5898

Working Copy

13th Annual Caribbean Multi-National
Business Conference Program
St.Maarten, N.A.

THEME: *A REGION IN TRANSITION – STRATEGY FOR CHANGE – BUILDING ALLIANCES*

Thursday, November 6, 2008

12:00 noon– 6:00pm :	*CONFERENCE REGISTRATION -*

5:00 – 6:30 - *TOWN HALL FORUM - HEALTH*

Healthy Eating and Living

Innovative Solutions for Life styles
Diseases- a Collaborative Approach – Diabetes, Hypertension, Obesity, Oral Health

Venue - ROYAL ISLANDER
Moderator - Dr. Marcia Bayne Smith

Speakers - Mrs. Karen Boykin-Towns
Congressmember Dr. Donna Christian Christensen
Commissioner Maria Buncamper Molanus, Health Commissioner, St. Maarten
Dr. Leon Merrick
Dr. Jay Cohan
Dr. John Palmer

6:30- 7:30pm - *OPENING RECEPTION*

Venue: - UPPER POOL

Theme: - *A REGION IN TRANSITION* -

Speakers: - Faye A. Rodney

Hon. Roy Marlin – Commissioner for Tourism & Finance – St Maarten.

MC: - Sabrina Hosang - Royal Caribbean Bakery

7:30 – 9:30 pm - OPENING DINNER

Venue: - MAHO ROOM

Theme: - *STRATEGY FOR CHANGE*

MC - Judge Sylvia Hinds-Radix

Speakers : - Susan Taylor

Hon. Donald Payne, Member US Congress

10:00pm – 1:00am: - HOSPITALITY AREA

<u>Friday, November 7, 2008</u>

8:00am – 8:45am - (BREAKFAST) – OCEAN TERRACE

9:00am – 6:00pm	*CONFERENCE REGISTRATION* *OCEAN TERRACE LOBBY* *CONFERENCE SECRETARIAT* *SABA ROOM*

9:00am – 10:15am	-	**OPENING CEREMONIES**
Venue:	-	**MAHO ROOM**
Theme:	-	***BUILDING ALLIANCES FOR PROGRESS***
Invocation:	-	**Rev. Susan Johnson=Cook**
Anthems:	-	**St. Maarten** **Lift Every Voice**
Remarks:	-	**Eric Eve** **Karen Boykin-Towns** **Marie Long** **Ed Goldberg** **Patrick Gaston** **Hazel Dukes**
Speakers:	-	**Hon. Carolyn Cheeks Kilpatrick – Member US Congress** **Commissioner Sarah Wescot-Williams, Leader of Government, St.Maarten** **Harry Belafonte**

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

TRAVEL AND TOURISM -

A Transformative Approach

Moderator - Lloyd Williams

Greetings - Wallace Ford

Speakers - Commissioner Roy Marlin

Howard Dodson

Congressman Gregory Meeks

Professor Rex Nettleford

Dr. Martin Valdes

12:00 noon – 1:15p.m	-	PRESENTATION *HEALTH – AN ECONOMIC DEVELOPMENT STRATEGY FOR THE REGION*
Greetings	-	Karen Boykin-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*

Venue	-	Royal Islander A
MC	–	Dr. Patricia Hazlewood
Speakers	-	Patrick Gaston
		Albert Browne

Round Table #2 –

Theme	-	*LOCAL BUSINESS INITIATIVES*
		Opportunities with US Companies
Venue	-	Royal Islander B
Speakers :	-	Ed Goldberg
		Eric Eve
		Albert Browne

4:30pm – 6:00pm	-	*TOWN HALL FORUM - EDUCATION*
Venue	-	Royal Islander A
Theme	:	*EDUCATION – SHARING WORKING SOLUTIONS*
Greetings	:	Michael Flanigan
Moderator	:	Dr. Marcella Maxwell

Speakers:	-	Hon. David M. Dinkins – Former Mayor, NYC
		Dr. Edison O. Jackson
		Dr. Marcia Keizs
		Professor Rex Nettleford, UWI
		William Payne, Assemblyman New Jersey

Venue:

6.30:00pm – 7:30pm - *HOST COUNTRY EVENING*

Venue: -

Theme -

MC:

Speakers:

7:30 – 8:00 pm:

8:00pm – 10:30.pm.

CULTURAL PRESENTATION

Venue :

Theme

10:00pm – 1:00am - *HOSPITALITY AREA*

Venue:

<u>Saturday, November 8, 2008</u>

7:45 am – 8:15 am	=	BREAKFAST
Venue	-	*OCEAN TERRACE*
8:30am – 10:00am	-	*PRESENTATION*
Theme		*WOMEN OF INFLUENCE AND POWER*
Venue:	-	*MAHO BEACH*

Greetings & Opening Remarks -	-	Brenda Scott
Moderator	-	Marilyn Johnson
Speakers:	-	Commissioner Sarah Wescot-Williams, Leader of Government Business
		Dame Billie Miller, former Deputy Prime Minister, of Barbados
		Dr. Marcia Keizs, President York College
		Michelle Paterson, First Lady New York State
		Congresswoman Eddie Bernice Johnson
		Rev. Dr. Susan Johnson-Cook
10.15am – 11:45am	-	*PRESENTATION*
Theme	-	*THE CARIBBEAN, IT'S VALUE & POTENTIAL*
Venue	-	Royal Islander A
Greetings	-	Wallace Ford
Moderator	-	Dame Billie Miller
Speakers	-	Hon. P. J. Patterson, former Prime Minister, Jamaica
		Hon. Dr. Ralph Gonsalves, Prime Minister St. Vincent and the Grenadines
	-	Hon. Dr. Denzil Douglas, Prime Minister, St. Kitts-Nevis
		Congressman Charles Rangel
12:00 noon – 1:30 p.m.		*PRIVATE MEETING – CLOSED DOOR SESSION* with Members of Congress and Ministers of Government

12:00 noon – 1:15p.m.		PRESENTATION
Theme	-	*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 Caribbean Development Bank
	-	Congressman Edolphus Towns
	-	Eric Eve
12:00 noon – 1:15pm	-	*PRESENTATION*
Theme		*Hemispheric Security – Ports/Airports – Crime – Drugs – Disaster*
Venue	-	Royal Islander B
Greetings	-	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

Theme:		*CARIBBEAN – A SOLID INVESTMENT*
Greetings	-	Hon. Darryl Towns
Speakers	-	Hon. William Thompson, NYC Comptroller
		Dr. Compton Bourne, President CDB
Round Table #1	-	*IMMIGRATION/DEPORTEES*
Venue	-	Royal Islander A
Moderator	-	Dr. Marco Mason
Speakers		Congressman Bennie Thompson
		Hon. Eddie Bernice Johnson, Member US Congress
		Attorney Stanford Rubenstein
		NYC Councilmember Dr. Kendall Stewart
Round Table#2:	-	HAITI – BOLD INITIATIVES – THE DIASPORA- CBC AND CARICOM
Venue	-	Royal Islander B
Moderator	-	Hon. Yvonne Graham
Speakers	-	Hon. Charles Rangel
		Hon. Gregory Meeks
		Hon. Ralph Gonsalves
		Dr. Lesly Kernisant
4:30 pm – 6:00pm	-	*TOWN HALL FORUM - TECHNOLOGY*
Venue:		Royal Islander A

Greetings & Opening - Marie Long

Moderator - Colin Ward

Speakers - Congressman Edolphus Towns
Albert Brown
Commissioner of Technology

6:30 – 7.30pm - GALA RECEPTION

Speakers - Susan Taylor

7.30pm – 10:00pm - *GALA DINNER & AWARDS PRESENTATION*

Speaker - Dr. Harry Belafonte
Hon. Sarah Wescot-Williams, Leader of Government Business

AWARDS PRESENTATION

ENTERTAINMENT

10:30pm – 1:00am - *HOSPITALITY AREA*

Venue: HOTEL CONFERENCE ROOM

Sunday, November 9, 2008

8:30 am – 10:00am - *POWER BREAKFAST*

Theme: - ***SPIRITUALITY - THE BASICS IN BUSINESS***

Greetings - ***Lowell Hawthorne***

Speakers - **Ed Goldberg**

Selection: - **Local Choir**

October 13, 2008

EXHIBIT 24

Jimerson, Jennifer

From: [redacted]@att.net
Sent: Thursday, October 30, 2008 11:05 AM
To: Jimerson, Jennifer
Subject: RE: FW: Flight Arrangements
Follow Up Flag: Follow up
Flag Status: Red
Attachments: Congressman Bennie Thompson.doc

The confirmation is the same as you gave to me - B3T15Y. I asked them to send me the email confirmation to me but have not got it yet. Could you call them and ask for it and also ask them to send it to me.
Letter re speaking assignment attached.

Patricia Louis
Executive Assistant
NY Carib News
Ph: (212) 944-[redacted]
Fax: (212) 944-2089

---------- *Original message from "Jimerson, Jennifer" <jjimerson@mail.house.gov>:* ----------

What's the confirmation #? What letter are you referring to? Is it included in the Ethics package?

From: *carib-desk@att.net [mailto:[redacted]@att.net]*
Sent: *Thursday, October 30, 2008 12:19 AM*
To: *Jimerson, Jennifer*
Subject: *RE: FW: Flight Arrangements*

The reservation has been paid for. Did you get the letter about his participation in sessions at the conference.

--
Patricia Louis
Executive Assistant
NY Carib News
Ph: (212) 944-[redacted]
Fax: (212) 944-2089

---------- *Original message from "Jimerson, Jennifer"*

<jjimerson@mail.house.gov>: ----------

It can only be on hold for 24 hours. The Reservation # is B3T1SY.

From: *carib-desk@att.net [mailto:[redacted]@att.net]*
Sent: *Monday, October 27, 2008 8:25 PM*
To: *Jimerson, Jennifer*
Subject: *Re: FW: Flight Arrangements*

Jennier,
Could you go ahead and make the reservation for them, and give me the locator number and I will pay for it.
Thanks
--
Patricia Louis
Executive Assistant
NY Carib News
Ph: (212) 944-[redacted]
Fax: (212) 944-2089

> ---------- *Original message from "Jimerson, Jennifer" <jjimerson@mail.house.gov>:* ----------
>
> *Patricia,*
> *Considering that the other options have several layovers the Congressman's preference would be the first itinerary with US Airways for $750.15. Congressman Thompson seating preferences is exit row aisle only and please seat him and Dr. Thompson together. Contact me if you have any questions.*
> *Thanks,*
> *Jennifer*
>
> ***Lowest Fare Found - Personal Rate***
>
> *1. #US 2422 L 06NOV TH JAN CLT 600A 839A CRJ 0 @*
> *2. #US 877 L 06NOV TH CLT SXM 1130A 409P 757 F 0 @*
> *3. #US 1556 L 09NOV SU SXM CLT 305P 611P 757 F 0 @*
> *4. #US 2595 L 09NOV SU CLT JAN 825P 924P CRJ 0 @*
>
> *BASE FARE- 645.00 TAX- 105.15 TOTAL- 750.15 USD*
>
> ---
>
> *1. #AA 3750 S 06NOV TH JAN DFW 600A 735A ER4 F 0E@*
> *2. #AA 1646 S 06NOV TH DFW MIA 1125A 305P 738 F 0E@*
> *3. #AA 729 O 06NOV TH MIA SXM 520P 915P 738 D 0E@*
> *4. #AA 748 O 09NOV SU SXM MIA 915A 1135A 738 B 0E@*
> *5. #AA 1973 S 09NOV SU MIA DFW 645P 905P 757 F 0E@*
> *6. #AA 3877 S 10NOV MO DFW JAN 745A 905A ER4 F 0E@*
>
> *BASE FARE- 633.00 TAX- 115.15 TOTAL- 748.15 USD*
>
> ---
>
> *1. #AA 3750 N 06NOV TH JAN DFW 600A 735A ER4 F 0E@*
> *2. #AA 1646 N 06NOV TH DFW MIA 1125A 305P 738 F 0E@*
> *3. #AA 729 N 06NOV TH MIA SXM 520P 915P 738 D 0E@*

4. #AA 2160 N 09NOV SU SXM MIA 415P 635P 738 D 0E@
5. #AA 1724 N 09NOV SU MIA DFW 920P 1130P 738 F 0E@
6. #AA 3877 N 10NOV MO DFW JAN 745A 905A ER4 F 0E@

BASE FARE- 645.00 TAX- 115.15 TOTAL- 760.15 USD

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1. #AA 3750 N 06NOV TH JAN DFW 600A 735A ER4 F 0E@
2. #AA 1646 N 06NOV TH DFW MIA 1125A 305P 738 F 0E@
3. #AA 729 N 06NOV TH MIA SXM 520P 915P 738 D 0E@
4. #AA 2160 N 09NOV SU SXM MIA 415P 635P 738 D 0E@
5. #AA 1724 N 09NOV SU MIA DFW 920P 1130P 738 F 0E@
6. #AA 3713 N 10NOV MO DFW JAN 1110A 1230P ER4 F 0E@

BASE FARE- 645.00 TAX- 115.15 TOTAL- 760.15 USD

---

1. #US 2422 L 06NOV TH JAN CLT 600A 839A CRJ 0 @
2. #US 877 L 06NOV TH CLT SXM 1130A 409P 757 F 0E@
3. #US 1556 L 09NOV SU SXM CLT 305P 611P 757 F 0E@
4. #US 2375 L 10NOV MO CLT JAN 1114A 1203P CRJ 0E@

BASE FARE- 645.00 TAX- 115.15 TOTAL- 760.15 USD

Lowest Fare Found - Government

1. #US 2422 Y 06NOV TH JAN CLT 600A 839A CRJ 0 @
2. #US 877 Y 06NOV TH CLT SXM 1130A 409P 757 F 0 @
3. #US 1556 Y 09NOV SU SXM CLT 305P 611P 757 F 0 @
4. #US 2595 Y 09NOV SU CLT JAN 825P 924P CRJ 0 @

BASE FARE- 2228.00 TAX- 105.15 TOTAL- 2333.15 USD

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1. #AA 3750 G 06NOV TH JAN DFW 600A 735A ER4 F 0E@
2. #AA 1646 G 06NOV TH DFW MIA 1125A 305P 738 F 0E@
3. #AA 729 G 06NOV TH MIA SXM 520P 915P 738 D 0E@
4. #AA 2160 G 09NOV SU SXM MIA 415P 635P 738 D 0E@
5. #AA 1724 G 09NOV SU MIA DFW 920P 1130P 738 F 0E@
6. #AA 3877 G 10NOV MO DFW JAN 745A 905A ER4 F 0E@

BASE FARE- 1320.00 TAX- 115.15 TOTAL- 1435.15 USD

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1. #AA 3750 G 06NOV TH JAN DFW 600A 735A ER4 F 0E@
2. #AA 1646 G 06NOV TH DFW MIA 1125A 305P 738 F 0E@
3. #AA 729 G 06NOV TH MIA SXM 520P 915P 738 D 0E@
4. #AA 2160 G 09NOV SU SXM MIA 415P 635P 738 D 0E@
5. #AA 1724 G 09NOV SU MIA DFW 920P 1130P 738 F 0E@
6. #AA 3713 G 10NOV MO DFW JAN 1110A 1230P ER4 F 0E@

BASE FARE- 1320.00 TAX- 115.15 TOTAL- 1435.15 USD

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1. #AA 3750 G 06NOV TH JAN DFW 600A 735A ER4 F 0E@
2. #AA 1646 G 06NOV TH DFW MIA 1125A 305P 738 F 0E@
3. #AA 729 G 06NOV TH MIA SXM 520P 915P 738 D 0E@
4. #AA 2160 G 09NOV SU SXM MIA 415P 635P 738 D 0E@
5. #AA 1724 G 09NOV SU MIA DFW 920P 1130P 738 F 0E@
6. #AA 3857 G 10NOV MO DFW JAN 210P 330P ER4 F 0E@

BASE FARE- 1320.00 TAX- 130.65 TOTAL- 1450.65 USD

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1. #AA 3876 L 06NOV TH JAN DFW 930A 1105A ER4 F 0E@
2. #AA 1819 G 06NOV TH DFW MIA 1250P 430P 757 L 0E@
3. #AA 729 G 06NOV TH MIA SXM 520P 915P 738 D 0E@
4. #AA 748 G 09NOV SU SXM MIA 915A 1135A 738 B 0E@
5. #AA 1973 G 09NOV SU MIA DFW 645P 905P 757 F 0E@
6. #AA 3877 G 10NOV MO DFW JAN 745A 905A ER4 F 0E@

BASE FARE- 1337.00 TAX- 115.15 TOTAL- 1452.15 USD

EXHIBIT 25

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 act of self-dealing between a disqualified person and a private foundation." 26 U.S.C. § 4941(a)(1). This statute, which was enacted in 1969, was intended to curb private foundations' attempts to influence Government officials. The Internal Revenue Service has issued a number of revenue rulings with respect to Government employees and prospective activities with private foundations.

Issue: The Internal Revenue Service imposes an individual penalty tax of up to 200% of the amount of compensation from a private foundation to certain Government officials conducting outside activities with these foundations.

Conclusion: Certain Government officials should refrain from accepting compensation (other than travel expenses within the United States) for outside activities with private foundations.

Discussion: Specifically, the statute imposes a tax on each act of self-dealing by a disqualified individual equal to five percent of the amount involved for each year in the taxable period. 26 U.S.C. § 4941(a)(1) [1]. In any case in which an initial tax is imposed on an act of self-dealing which is not corrected within the taxable period, a tax equal to 200 percent of the amount involved will be imposed on the disqualified person. 26 U.S.C. § 4941(b)(1)[2].

The Code defines "self-dealing" as any direct or indirect agreement by a private foundation to make any payment to certain enumerated government officials. 26 U.S.C. § 4941(d)(1)(F)[3]. Government officials who are "disqualified persons" within the scope of this restriction are elective officials, Presidential appointees, Schedule C employees, and individuals compensated at or above GS-15-7 levels, irrespective of their appointment mechanism (Title 42, SBRS, Commissioned Corps), and personal or executive assistants or secretaries to any of the foregoing. 26 U.S.C. § 4946(c). Excluded from the definition of government employees is a "special governmental employee" as defined in 18 U.S.C. § 202 (a)[4]; Treas. Reg. 53.4946 §1(g)(1).

Also excluded from the definition of self-dealing are agreements to employ an individual for any period after the termination of his government service if that individual is terminating his government service within a 90 day period. 26 U.S.C. § 4941 (d)(1)(F). For purposes of the statute, a "private foundation" has the same meaning as in 26 U.S.C. § 509. A website for obtaining the status of a foundation can be found at http://www.irs.ustreas.gov/bus_info/eo/eosearch.html.

Government officials who are within the scope of this statute will be required to pay the tax only if the individual participates in the act of self-dealing knowing that it is an act of self-dealing. 26 U.S.C. § 4941 (a)(1). The regulations define "knowing" to include those situations when: the individual has actual knowledge of the facts that such a transaction would be self-dealing; he is aware that the act violates Federal tax law governing self-dealing; and he negligently fails to make reasonable attempts to ascertain whether the act is an act of self-dealing or he is in fact aware that it is in an act of self-dealing. Treas. Reg. § 53.4941 (a)(1)-(b)(3). The burden is thus on the individual to determine whether he or she is liable under the statute.

An individual's participation in an act of self-dealing will not be considered "knowing" if the individual, after full disclosure of the factual situation to legal counsel, relies on the advice of counsel expressed in a "reasoned written legal opinion" that an act is not an act of self-dealing within the meaning of the statute, even if the act is subsequently determined to be self-dealing. Treas. Reg. § 53.4941(a)(1)-(b)(6).

Finally, a tax for self-dealing will not be imposed under the following circumstances: certain nontaxable prizes and awards if the recipients are selected from the general public; nontaxable scholarships and fellowship grants; qualifying annuity plans; contributions or gifts not exceeding an aggregate of $25; payments made under the government employee training program in 5 U.S.C. Ch. 41; and payment of travel expenses within the United States. 26 U.S.C. § 4941 (d)(2)(B); Rev. Rul. 131, 1974-2 C.B. 385.

As a result of this statute, NIH employees paid at or above the GS 15-7 level are effectively prohibited from receiving compensation from a private foundation for activities such as teaching, writing, advising, or consulting. The Internal Revenue Service may serve a deficiency notice upon an employee, who would then be forced to pay the tax or contest the assessment.

Effective immediately, all requests for approval of outside activities must be reviewed in accordance with the statutory provision at 26 U.S.C. § 4941. The compensation level of the individual requesting approval must be considered in conjunction with an analysis of the nature of the private entity offering the opportunity for compensation. Previously approved outside activities with foundations for NIH employees who are paid at or above the GS 15-7 level should be reviewed to determine the status of the foundation. Should the status of the foundation be private, any affected employee must be advised to either accept only travel expenses within the United States for his/her service or resign from such service. Employees who have questions whether payment to them by a private foundation constitutes acts of self-dealing should consult private counsel.

For your information, the Foundation for the National Institutes of Health (FNIH) and the Foundation for Advanced Education in the Sciences (FAES) are For your information, the Foundation for the National Institutes of Health (FNIH) and the Foundation for Advanced Education in the Sciences (FAES) are not considered private foundations for purposes of this prohibition.

The NIH Office of the Legal Advisor has reviewed and concurs in this opinion.

cc: Robert Lanman, Stephen Benowitz

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[1] When a tax is imposed on a self-dealer, a corresponding tax of 2.5 percent is imposed on any foundation manager unless the participation by the foundation manager is not willful and is due to reasonable care. 26 U.S.C. § 4941(a)(2). A maximum tax of $10,000 may be imposed. 26 U.S.C. § 4941 (c) (2) .

[2] The "taxable period" is defined as the period beginning with the date on which the act of self-dealing occurs, and ending on the earliest of: the date that a deficiency notice is mailed by the I.R.S.; the date on which the tax is assessed ; or the date on which the correction of the act of self-dealing is completed. 26 U.S.C. § 4941 (e), Treas. Reg. § 53.4941 (e) -1 (a) (1). As with the initial tax, a corresponding additional tax of 50 percent will be imposed on any foundation manager who refuses to agree to the correction. 26 U.S.C. § 4941 (b) (2). As with the initial tax, the penalty on a foundation manager is limited to $10,000. 26 U.S.C. § 4941 (c) (2)

[3] The statute also defines "self-dealing" to include: the sale or exchange, or leasing, of property; the lending of money or other extension of credit; the furnishing of goods, services, or facilities; payments to a disqualified person as defined in 26 U.S.C. § 4946 (a) (such as substantial contributors, foundation managers, holders of 20 percent of the voting power or beneficial interests; family members of disqualified individuals, or a corporation, partnership, or trust holding a 35 percent interest); and transfer to or use by a disqualified person of the foundation's income or assets. 26 U.S.C. § 4941 (d).

[4] 18 U.S.C. § 202 (a) defines "special Government employee" as temporary employee appointed for a term not to exceed 130 days, a part-time U.S. commissioner or magistrate, a part-time member of Congress, or a Reserve or National Guard officer.

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