BEFORE THE
FEDERAL ELECTION COMMISSION
OF THE
UNITED STATES OF AMERICA

In the Matter of:

Rep. James Moran

Moran for Congress; and

Terry Lierman

Respondents

MUR 5141

COMPLAINT

NATIONAL LEGAL AND POLICY CENTER, a corporation organized and existing under the District of Columbia Non-profit Corporation Act and having its offices and principal place of business at 1309 Vincent Place, Suite 1000, McLean, Virginia, 22101, files this Complaint with the Federal Election Commission in accordance with the provisions of 2 U.S.C. §437g(a)(1) in the belief that Respondents violated provisions of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §§431, et seq.

The primary purpose of the National Legal and Policy Center, a charitable and educational organization described in section 501(c)(3) of the Internal Revenue Code, is to foster and promote ethic in government. In furtherance of that purpose, national Legal and Policy Center educates the public about the "Code of Ethics for Government Service," as adopted by a Joint Resolution of Congress on July 11, 1958; and it endeavors to ensure compliance by government officials with provisions of the Code and the laws of the United States. The apparent violations alleged herein represent a serious lack of compliance with the law by an elected official, his campaign committee and one of his political contributors.

Moran said he couldn't recall if he had "directly called Terry. It may have been through. . . my campaign manager.[2]

Moran failed to disclose the loan on the Financial Disclosure Statement for Calendar Year 1999 which he filed on May 15, 2000. (see Exhibit 2) Moran claimed that the failure to disclose the personal loan, as required by the Ethics in Government Act of 1978. Just above Moran's signature on the Financial Disclosure Statement is the statement:

Any individual who knowingly and willfully falsifies, or knowingly or willfully fails to file this report may be subject to civil and criminal sanctions. (see 5 U.S.C. app 4, §104 and 18 U.S.C. §1001)

After Moran filed the Financial Disclosure Statement, he wrote to the House Committee on Official Standards and asked for a ruling on whether he had to disclose the loan and was told that he did. He then disclosed the loan in an unsigned and undated amended report which was not filed until July 31, 2000.

Apparent Violations

The gravamen of this complaint is quite simple: the large, unsecured, below-market personal loan from the drug company lobbyist to Congressional candidate Moran in June 1999 constituted a contribution far in excess of the amount allowed by law.

The loan remains a contribution as long as it is outstanding. As nothing in the public record indicates that the loan has been repaid, it is apparently a continuing violation of the Federal Election Campaign Act.

Exacerbating the case are the facts that:

- the loan was made by a lobbyist who clearly was receiving important legislative favors from Rep. Moran
- the loan carried no maturity date
- the loan had no fixed payment schedule for principal
- the loan was not properly or timely disclosed on the Financial Disclosure Statement for 1999
- the loan was never disclosed to the Federal Election Commission by Moran or Moran for Congress, either in 1999 or 2000

The Loan Constituted a Contribution

It is beyond dispute that a candidate for Congress may not take a personal loan in an amount in excess of statutory limits which apply to campaign contributions. Rep. Moran's filings with the Federal Election Commission indicate that he was a candidate during all times material to this complaint.

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[2] id.

The Federal Election Commission has addressed the issue of loans to candidates as follows:

> **A loan to a candidate or political committee is a contribution to the extent it remains outstanding. Repayments made on a loan reduce the amount charged against the lender's or endorser's contribution limit. However, a loan that exceeds the lender's or endorser's contribution limit is unlawful even if repaid in full.**
>
> **FEC Campaign Guide, March 1995, Page 10**

The Federal Election Campaign Act and regulations enacted by the Federal Election Commission pursuant to the Act unequivocally treat personal loans to Congressional candidates such as the one in this case, as contributions, subject to the same limits as other contributions.

The large unsecured personal loan given to candidate Moran is a classic example of a loan which constitutes a contribution.

A leading treatise on campaign finance laws, Federal Regulation of Campaign Finance and Political Activity, by Thomas Schwarz and Alan Straus (Matthew Bender, New York, 1985), summarizes the state of the law with respect to loans to Congressional candidates as follows:

> **Loans, Advances, and Deposits**
>
> **Except for certain bank loans made in the ordinary course of business,[35] loans are contributions.[36] A loan becomes a contribution at the time it is made by the lender, and it remains a contribution, and must be reported as such, to the extent that any principal amount remains unpaid.[37] The aggregate outstanding principal amount of a loan to a political committee or candidate, when added to other contributions made by the lender to that committee or candidate, may not exceed the maximum contribution limitations.[38]**
>
> **Note 35:** **2 U.S.C. § 431(8)(B)(vii)(Supp. III 1979); 11 CFR § 100.7(b)(11)**
>
> **Note 36:** **2 U.S.C. § 431(8)(A)(i)(Supp. III 1979); 11 CFR § 100.7(a)(1). *See, e.g.*, AO 1981-20, *Fed. Elec. Camp. Fin. Guide* (CCH) ¶ 5610 (June 4, 1981) (joint investment of state and federal PAC funds to buy treasury note, where neither had the funds sufficient by itself to make the purchase, constituted a contribution in the form of a loan to the federal PAC).**

Compare AO 1981-19, *Fed. Elec. Camp. Fin. Guide* (CCH) ¶ 5609 (June 4, 1981) (joint investment of federal and non-federal funds by a political committee permitted where it did not yield any direct or indirect advantage or preferred treatment to the federal fund); AO 1978-40, *Fed. Elec. Camp. Fin. Guide* (CCH) ¶ 5341 (September 1, 1978) (loans obtained by federal candidate to pay living and personal expenses during a period of candidacy are contributions under the Act and must be reported as such; amount loaned by an individual with respect to any election may not exceed $1,000) *See also* MUR 1134 (June 18, 1980) (interspousal loans considered contributions).

Note 37: 11 C.F.R. § 100.7(a)(1)(i)(B)

Note 38: *Id. See also* MUR 1130 (Apr. 24, 1981); MUR 896 (July 29, 1980) (excessive loan); MUR 967 (June 24, 1980) (attempt to characterize excessive loan as business transaction failed for lack of substantiation of business transactions); MUR 1055 (July 22, 1980) (excessive loan deemed knowingly accepted by candidate)

Throughout 1999, Moran was a candidate for Congress. His political committee was both accepting contributions and making expenditures in an amount more than sufficient to make him subject to the limitations of the Federal Election Campaign Act. Indeed, as noted, Moran's committee accepted a $2,000 political contribution from Schering-Plough's political action committee shortly after he began promoting the legislation benefiting that company and shortly after he pocketed the large personal loan from that company's registered lobbyist.

The purpose of the loan (in this case, purportedly Moran's personal legal bills) is irrelevant.
The Federal Election Commission has repeatedly determined that loans to candidates to cover personal expenses during a campaign are still considered contributions according to the Federal Election Campaign Act. [3]

There is an exception in the Act that provides that loans by lending institutions made in the ordinary course of business to candidates do not constitute contributions to the candidate or the candidate's authorized committee.[4]

[3] see Federal Election Commission Advisory Opinion 1978-40
[4] 2 U.S.C. § 431(8)(B)(vii); 11 C.F.R. § 100.7(b)(11)

Not only does this exception not apply in the present case because Lierman is not a lending institution, but it is interesting to note that even if the loan in question did come from a lending institution, it would still violate the Act because of its overly generous terms. Lierman was charging 8% for an unsecured personal loan when the market rate was more than 50% higher: 12.5%. The failure of the note to include any fixed payment schedule for repayment of the principal further underscore the fact that the transaction was not remotely similar to any commercial loan Moran may have been able to obtain at that time.

Lierman's Loan Exceeds Legal Limits

Lierman's personal loan to Moran constituted a contribution to the Moran campaign far in excess of the $1,000 limitation allowed under the Federal Election Campaign Act.

As nothing in the public record indicates that the loan has been paid off, any amount of the unpaid balance over the $1,000 legal limit represents an ongoing violation of the contribution limits of the Federal Election Campaign Act.

Failure to Disclose Loan Constitutes Reporting Violation

One reason the illegal personal loan from Lierman to Moran continued for more than a year without public notice is that Moran's political committee repeatedly failed to disclose the transaction in any of their reports filed with the Federal Election Commission.

The Federal Election Campaign Act requires all applicable contributions and loans to be disclosed in the candidates required filings with the FEC. As such, the Lierman loan should have been reported on each and every report filed by Moran for Congress since the loan was made.

Public disclosure is one of the essential elements of the Federal Election Campaign Act. As a Member of Congress who has participated in many elections, Moran had a duty to know the law and to seek counsel if he was unclear about the disclosure requirements. Moreover, this area of the law is well-established and not difficult to understand. The FEC has consistently held in its regulations and advisory opinions that personal loans by individuals to federal candidates are limited to the same amounts as contribution limits.

Conclusion

None of the essential facts supporting this complaint are in dispute.

Moran took a large, unsecured personal loan from a lobbyist. The $25,000 loan was well over the $1,000 limit allowed by the Federal Election Campaign Act. The loan was from an individual, not a bank or credit union. Moran was clearly a candidate at the time. Moran never disclosed the personal loan to the Federal Election Commission.

Even a cursory review of similar cases which have come before the Federal Election Commission reveals how clearly the Lierman loan constitutes a contribution in excess of the legal limit. In the Federal Election Commission Advisory Opinion 1978-40 cited earlier, for example, there was a personal loan of just $3,900 from 10 individuals to an individual, made prior to the individual's filing of a statement of candidacy, with the strict proviso that the money just go for personal and family living expenses. The FEC concluded that the loan was a contribution for purposes of the Act, that it had to be disclosed in reports filed with the FEC and that "the amount contributed (loaned) by any individual with respect to any election not exceed $1,000. 2 U.S.C. §

434(b), § 441a(a)(1)"

Contrast that fact pattern with a secret $25,000 unsecured loan from a lobbyist at below-market rates that is never disclosed to the FEC. The fact that it is beyond dispute that Rep. Moran was promoting legislation for the very same lobbyist which was apparently worth billions of dollars to the company employing the lobbyist certainly underscores the importance of the public disclosure aspects of this complaint.

Given the very compelling pattern of facts present in this case, the public is entitled to a full and prompt investigation. The public has lost faith in the integrity of its governmental institutions, including Congress, because all too often they have seen the public trust betrayed to advance personal, political and economic interests.

NATIONAL LEGAL AND POLICY CENTER

By: _____

Kenneth Boehm
Chairman

Subscribed and sworn before me this 31st day of October 2000.

State of Virginia
County of Fairfax

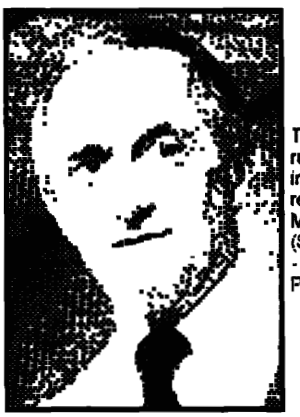
_____

My commission expires:

Moran Got Loan From Drug Lobbyist

By Jo Becker
Washington Post Staff Writer
Tuesday, October 31, 2000; Page A01

The stakes were high. Schering-Plough Corp. had assembled a lobbying team to persuade Congress to help preserve its monopoly on the popular allergy drug Claritin. Furious watchdog groups argued that extending the pharmaceutical giant's patent would cost consumers billions of dollars by delaying access to cheaper generic drugs.



Terry Lierman, who is running for Congress in Maryland, at a reception and rally in McLean, Va. (Stephanie Kuykendal - The Washington Post)

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The drug company found an ally in Rep. James P. Moran Jr. (D-Va.).

On June 30, 1999, Moran signed up to co-sponsor a bill to help Schering-Plough. On July 23, 1999, Moran sent a letter to other New Democrats, seeking their support.

About the same time that summer, Moran received some much-needed financial help: an unsecured $25,000 loan from Terry Lierman, a lobbyist for Schering-Plough. Moran was in the midst of a messy divorce and in financial straits.

Lierman, a Montgomery County Democrat now running against Rep. Constance A. Morella (R-Md.), said he lent Moran the money based solely on their long-standing friendship.

"Jim Moran has been my friend for 26 years," Lierman said. "To draw any other conclusion would be malicious in any context."

Moran said his support of Schering-Plough had nothing to do with the loan. He said he was convinced by the company's argument that it deserved a patent extension because the drug's entry into the market had been delayed.

"I can see why people might raise their eyebrows if that's all the information they had," said Moran, a five-term incumbent from Alexandria. "But I met with a number of Schering-Plough people. Terry may have been involved in setting that up, but Terry really never lobbied me on anything."

Lierman said Sunday night that he could not release the terms of the loan without talking to Moran first. Yesterday, Lierman faxed to The Washington Post a copy of a one-paragraph promissory note dated June 25, 1999, that said Moran borrowed $25,000, with the option to borrow more at the same 8 percent annual interest rate. The promissory note was never publicly recorded, Lierman said.

Bankers, speaking without knowledge of the people involved, described the loan as unusual because it lacks a maturity date and has no provision for repayment of the principal other than to say that Lierman may call in the loan at any time.

"It would be very unlikely that you get those terms at a bank," said Keith Leggett, a senior economist at the American Bankers Association.

It also might have been difficult for Moran to go to a bank, something he said he didn't even consider. The promissory note is dated five days before Moran signed on to the Claritin bill and one day after Moran's wife filed for divorce.

Divorce records showed that the couple's finances were in dismal shape, the result of heavy stock

trading losses and personal debts incurred since their young daughter's 1994 battle with cancer.

Members of Congress are forbidden to accept gifts "in return for being influenced in the performance of an official act." Even without a quid pro quo, a loan to a House member can be considered an improper gift if it was not made on "commercially reasonable" terms.

Members of Congress may accept loans from a person other than a financial institution "provided that the loan is on commercially reasonable terms, including requirements for repayment and a reasonable rate of interest," House rules say.

The law also prohibits members from soliciting a gift "from any person who has interests before the House," a prohibition that applies not only to the solicitation of money, but "anything of value."

Lierman said Moran, a longtime friend, came to him for help. Lierman said that he "probably did lobby Jim" on the Claritin bill but that there was no connection to the loan.

"He has a divorce problem and he comes to a friend, and a friend does what any friend would do," Lierman said.

Moran said he couldn't recall if he had "directly called Terry. It may have been through . . . my campaign manager."

Moran did not disclose the loan on the annual financial disclosure report he filed May 15 this year. That, Moran first said yesterday, was an oversight.

But late yesterday, his chief of staff said Moran was mistaken. On May 15, 2000, the same day that Moran filed his financial disclosure report, he wrote to the House Committee on Standards of Official Conduct and asked for a ruling on whether he had to disclose the loan. Moran's divorce lawyer had advised him that he did not have to disclose the loan because the money was being used to pay Moran's legal fees.

The ethics committee disagreed. So Moran disclosed the loan in an unsigned, undated amended report received July 31 by the House Legislative Resource Center.

Lierman reported collecting an amount ranging from $201 to $1,000 in interest from "Sen. Jim Moran" in 1999 on his financial disclosure form. Such forms do not ask for a specific amount. Moran said he tries to pay between $500 and $1,000 a month. His office said it would try to locate canceled checks and release them today.

The terms outlined in the promissory note require that Moran pay 8 percent in interest annually. The payments must be made no less than semiannually.

In June 1999, when Lierman lent Moran the money, the minimum rate for an unsecured personal loan in the Washington area was 12.5 percent, according to Bank Rate Inc., a company that tracks rates.

"With an unsecured loan and no collateral, [banks] really are going to look at your credit rating" to set the rate, said the company's John Schaffer. One possible reason that Lierman might charge Moran a lower rate is that the loan may be called in at any time, said Leggett, the bankers association economist.

Moran said he did not think there was anything unusual about the loan. "I just didn't want him [Lierman] to lose money," he said. "If he put it into a savings account, he wouldn't have earned as much as 8 percent."

House members are told to contact the Committee on Standards of Official Conduct "before entering into a loan arrangement with a person other than a financial institution." House rules also state that gifts from friends valued at more than $250 "may not be accepted unless the Standards Committee issues a written determination."

Moran did contact the ethics committee by letter--three days after he got the loan.

But he asked only whether he could accept a loan from an unnamed individual and "whether there is any limitation on the profession of the creditor." The letter did not disclose the loan's terms.

Lierman said that he and Moran first met in 1976, when Lierman, then the staff director for a Senate Appropriations subcommittee, hired Moran for a staff job. They became close friends, and their families vacationed together, Lierman said.

But last year, Moran's family life was unraveling.

On June 23, 1999, Moran's wife, Mary M. Moran, placed an emergency call to police during a domestic argument at the couple's Alexandria home. No charges were filed.

The next day, she filed for divorce. According to public records and associates of Moran who were contacted at the time, Moran was earning $136,700 as a congressman. But after making roughly $7,000 in monthly housing and loan payments, the family was living on less than $2,000 a month.

The day after that, Lierman, then a registered lobbyist for Schering-Plough, lent Moran the money.

On June 30, 1999, Moran signed up to co-sponsor the eventually unsuccessful bill to help the drug company extend its exclusive Claritin patent--and keep generic drug manufacturers from encroaching on its business. For Schering-Plough, it was no small matter; the drug brought the company $2.3 billion in revenue last year. But extending the patent could cost consumers $7.3 billion over 10 years, a University of Minnesota study found.

On July 23, 1999, Moran and Rep. Ellen Tauscher (D-Calif.) sent a letter to fellow New Democrats, urging them to vote for the Claritin bill.

Moran said yesterday: "There were a whole bunch of people bringing that up at the time. . . . I don't know how much influence I had."

Twenty days after the letter went out, Schering-Plough's political action committee donated $2,000 to Moran's campaign, Federal Election Commission records show.

UNITED STATES HOUSE OF REPRESENTATIVES

FINANCIAL DISCLOSURE STATEMENT FOR CALENDAR YEAR 1999

FORM A
For use by Members, officers, and employees

RECEIVED
LEGISLATIVE RESOURCE
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HAND DELIVERE

MC

(Office Use Only)

James P. Moran, Jr.
(Full Name)

2426-B South Walter Reed Dr., Arlington, VA 22206 202-225-4376
(Mailing Address) (Daytime Telephone)

Filer Status	[X] Member of the U.S. House of Representatives	State: VA District: 8th	[ ] Officer or Employee	Employing Office:	A *$200 penalty* shall be asse against anyone who files more 30 days late.
Report Type	[X] Annual (May 15)	[ ] Amendment	[ ] Termination	Termination Date:	

PRELIMINARY INFORMATION — ANSWER EACH OF THESE QUESTIONS

I. Did you or your spouse have "earned" income (e.g., salaries or fees) of $200 or more from any source in the reporting period? If yes, complete and attach Schedule I.	Yes [XX]	No [ ]	VI. Did you, your spouse, or a dependent child receive any reportable gift in the reporting period (i.e., aggregating more than $260 and not otherwise exempt)? If yes, complete and attach Schedule VI.	Yes [ ]	No
II. Did any individual or organization make a donation to charity in lieu of paying you for a speech, appearance, or article in the reporting period? If yes, complete and attach Schedule II.	Yes [XX]	No [ ]	VII. Did you, your spouse, or a dependent child receive any reportable travel or reimbursements for travel in the reporting period (worth more than $260 from one source)? If yes, complete and attach Schedule VII.	Yes [X]	No
III. Did you, your spouse, or a dependent child receive "unearned" income of more than $200 in the reporting period or hold any reportable asset worth more than $1,000 at the end of the period? If yes, complete and attach Schedule III.	Yes [ ]	No [X]	VIII. Did you hold any reportable positions on or before the date of filing in the current calendar year? If yes, complete and attach Schedule VIII.	Yes [ ]	No
IV. Did you, your spouse, or dependent child purchase, sell, or exchange any reportable asset in a transaction exceeding $1,000 during the reporting period? If yes, complete and attach Schedule IV.	Yes [ ]	No [X]	IX. Did you have any reportable agreement or arrangement with an outside entity? If yes, complete and attach Schedule IX.	Yes [ ]	No
V. Did you, your spouse, or a dependent child have any reportable liability (more than $10,000) during the reporting period? If yes, complete and attach Schedule V.	Yes [XX]	No [ ]	Each question in this part must be answered and the appropriate schedule attached for each "Yes" response		

EXCLUSION OF SPOUSE, DEPENDENT, OR TRUST INFORMATION — ANSWER EACH OF THESE QUESTIONS

TRUSTS—Details regarding "Qualified Blind Trusts" approved by the Committee on Standards of Official Conduct and certain other "excepted trusts" need not be disclosed. Have you excluded from this report details of such a trust benefiting you, your spouse, or dependent child?	Yes [ ]	No
EXEMPTION—Have you excluded from this report any other assets, "unearned" income, transactions, or liabilities of a spouse or dependent child because they meet all three tests for exemption?	Yes [ ]	No

CERTIFICATION — THIS DOCUMENT MUST BE SIGNED BY THE REPORTING INDIVIDUAL AND DATED

This Financial Disclosure Statement is required by the Ethics in Government Act of 1978, as amended. The Statement will be available to any requesting per upon written application and will be reviewed by the Committee on Standards of Official Conduct or its designee. Any individual who knowingly and willfully falsifi or who knowingly and willfully fails to file this report may be subject to civil penalties and criminal sanctions (*See* 5 U.S.C. app. 4, § 104 and 18 U.S.C. §10

Certification	Signature of Reporting Individual	Date (Month, Day, Year)
I CERTIFY that the statements I have made on this form and all attached schedules are true, complete and correct to the best of my knowledge and belief.	James P. Moran	5/15/00

SCHEDULE I — EARNED INCOME

List the source, type, and amount of earned income from any source (other than the filer's current employment by the U.S. Government) totalling $200 or more during the preceding calendar year. For a spouse, list the source and amount of any honoraria; list only the source for other spouse earned income exceeding $1,000.

	Source	Type	Amount
Examples:	Keene State	Approved Teaching Fee	$6,000
	State of Maryland	Legislative Pension	$9,000
	Civil War Roundtable (Oct. 2nd)	Spouse Speech	$1,000
	Ontario County Board of Education	Spouse Salary	NA
	McEnearney Associates, Inc.	Spouse income	$1000+
	Century 21 Quality Homes	Spouse income	$1000+

For payments to charity in lieu of honoraria, use Schedule II.

Name James P. Moran, Jr. | Page ___ o

SCHEDULE II — PAYMENTS IN LIEU OF HONORARIA MADE TO CHARITY

List the source, activity (i.e., speech, appearance, or article), date, and amount of any payment made by the sponsor of an event to a charitable organizati in lieu of an honorarium. A separate confidential list of charities receiving such payments must be filed directly with the Committee on Standards of Official Conduct. An envelope for transmitting the list is included in each Member's filing package.

Source	Activity	Date	Amount
Examples: Association of American Associations, Wash., D.C.	Speech	Feb. 2, 1999	$2,000
XYZ Magazine	Article	Aug. 13, 1999	$500
Kmart Family Foundation	Speech	9/22/99	$500.00
Alexandria Historical Society	Speech	9/22/99	$ 50.00
Manufacturers Alliance	Speech	12/9/99	$1000.00

This page may be copied if more space is required.

Name James P. Moran, Jr. | Page ___ of ___

SCHEDULE V — LIABILITIES

Report liabilities of over $10,000 owed to any one creditor ***at any time*** during the reporting period by you, your spouse, or dependent child. Mark the highest amount owed during the year. **Exclude:** Any mortgage on your personal residence (unless it is rented out); loans secured by automobiles, household furniture, or appliances; and liabilities owed to a spouse, or the child, parent, or sibling of you or your spouse. Report ***revolving charge accounts*** only if the balance at the close of the preceding calendar year exceeded $10,000.

SP, IC, IT	Creditor	Type of Liability	Amount of Liability									
			B $10,001–$15,000	C $15,001–$50,000	D $50,001–$100,000	E $100,001–$250,000	F $250,001–$500,000	G $500,001–$1,000,000	H $1,000,001–$5,000,000	I $5,000,001–$25,000,000	J $25,000,001–$50,000,000	Over
	Example: First Bank of Wilmington, Delaware	Mortgage on 123 Main St., Dover, Del.				X						
[illegible]	Congressional Federal Credit Union	Revolving charge	X									
[illegible]	First USA Bank	Revolving charge	X									
T	C.F.C.U. ~~(Line of Credit)~~	Visa Card	X									

CHEDULE VI — GIFTS

eport the source, a brief description, and the value of all gifts totalling more than $260 received by you, your spouse, or a dependent child from any source during the year.

clude: Gifts from relatives, gifts of personal hospitality of an individual, local meals, and gifts to a spouse or dependent child that are totally independent of his or her relationship you. Gifts with a value of $100 or less need not be added towards the $260 disclosure threshold.

te: The gift rule (House Rule 26, clause 5) prohibits gifts except as specifically provided in the rule.

Source	Description	Value
mple: Mr. Joseph H. Smith, Anytown, Anystate	Silver Platter (determination on personal friendship received from Committee on Standards)	$270

Use additional sheets if more space is required.

Name James P. Moran, Jr. | Page ___

SCHEDULE VII —TRAVEL PAYMENTS AND REIMBURSEMENTS

Identify the source and list travel itinerary, dates, and nature of expenses provided for travel and travel-related expenses totalling more than $260 receive you, your spouse, or a dependent child during the reporting period. Indicate whether a family member accompanied the traveler at the sponsor's expense the amount of time, if any, that was not at the sponsor's expense. Disclosure is required regardless of whether the expenses were reimbursed or paid dir by the sponsor.

Exclude: Travel-related expenses provided by federal, state, and local governments, or by a foreign government required to be separately reported unde Foreign Gifts and Decorations Act (5 U.S.C. § 7342); political travel that is required to be reported under the Federal Election Campaign Act; travel provid a spouse or dependent child that is totally independent of his or her relationship to you.

	Source	Date(s)	Point of Departure—Destination—Point of Return	Lodging? (Y/N)	Food? (Y/N)	Was a Family Member Included? (Y/N)	Any time not sponsor's expe
Examples:	Chicago Chamber of Commerce	Mar. 2	Wash., D.C.—Chicago—Wash., D.C.	N	N	N	N
	Roycroft Corporation	Aug. 6–13	Wash., D.C.—Los Angeles—Cleveland	Y	Y	Y	4 Days
	Hershey Bipartisan Retreat Aspen Institute	3/19-21	Wash.D.C.-Hershey PA-DC	Y	Y	Y	N
	Congressional Economic Leadership Institute	3/26-4/1	Wash.D.C.-Florence, Rome Italy-Wash.D.C.	Y	Y	N	N
	Democratic Leadership Conf. Spring Retreat	4/30-5/3	Wash.D.C. - New Orleans - Wash. D.C.	Y	Y	N	N
	The Wilderness Society; Alaska Wilderness League; Sierra Club	7/3-8	Wash. D.C. - Alaska - Wash. D.C.	Y	Y	Y	N
	Visions Project, Kennedy School of Gov't, Harvard U.	11/19-20	Wash. D.C. - Boston - Wash. D.C.	Y	Y	N	N