

111TH CONGRESS }
1st Session

HOUSE OF REPRESENTATIVES

{ REVIEW NO.
10-4283

**OFFICE OF CONGRESSIONAL ETHICS
UNITED STATES HOUSE OF
REPRESENTATIVES**

Report and Findings

Transmitted to the
Committee on Standards of Official Conduct
on September 1, 2010
and released publicly pursuant to H. Res. 895 of the
110th Congress as amended



September 2010

House of Representatives Office of Congressional Ethics Review No. 10-4283

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September 2010

OFFICE OF
CONGRESSIONAL ETHICS
BOARD

UNITED STATES HOUSE OF REPRESENTATIVES
ONE HUNDRED ELEVENTH CONGRESS

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REPORT

Review No. 10-4283

The Board of the Office of Congressional Ethics (hereafter the "Board"), by a vote of no less than four members, on August 27, 2010, adopted the following report and ordered it to be transmitted to the Committee on Standards of Official Conduct of the United States House of Representatives.

SUBJECT: Representative John Campbell

NATURE OF THE ALLEGED VIOLATION: H.R. 4173, formally known as the Wall Street Reform and Consumer Protection Act of 2009 (hereafter the "Financial Reform Bill") was reported out of the Committee on Financial Services on the afternoon of December 2, 2009. The Financial Reform Bill was passed by the House on December 11, 2009. Previously, while the Committee on Financial Services marked up two pieces of legislation that would later be incorporated within the Financial Reform Bill, Representative Campbell held a "Financial Services Dinner." Further, in the nine day period between December 2nd and December 11th, Representative Campbell held two fundraising events for his campaign committee. At one fundraising event, two days before the final vote, all attendees were entities or individuals registered to lobby on the Financial Reform Bill. At another event on the same day, ten out of eleven attendees were entities or individuals registered to lobby on the Financial Reform Bill. In addition, Representative Campbell's professional fundraiser offered one-on-one meetings between Representative Campbell and entities registered to lobby on the Financial Reform Bill during the nine day period noted above.

If Representative Campbell solicited or accepted contributions in a manner which gave the appearance that special treatment or access was being provided to donors or the appearance that the contributions were linked to an official act, then he may have violated House Rules and Standards of Conduct.

RECOMMENDATION: The Board of the Office of Congressional Ethics recommends that the Committee on Standards of Official Conduct further review the above allegations because there is a substantial reason to believe that Representative Campbell solicited or accepted contributions in a manner which gave the appearance that special treatment or access was provided to donors or that contributions were linked to an official act.

VOTES IN THE AFFIRMATIVE: 5

VOTES IN THE NEGATIVE: 0

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

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FINDINGS OF FACT AND CITATIONS TO LAW

Review No. 10–4283

On August 27, 2010, the Board of the Office of Congressional Ethics (the “Board”) adopted the following findings of fact and accompanying citations to law, regulations, rules, and standards of conduct (*in italics*). The Board notes that these findings do not constitute a determination that a violation actually occurred.

I. INTRODUCTION

A. SUMMARY OF ALLEGATIONS

1. There is a substantial reason to believe that Representative Campbell solicited or accepted contributions in a manner which gave the appearance that special treatment or access was being provided to campaign contributors or that the contributions were linked to an official act.

2. The Board notes that, among other facts, Representative Campbell held a fundraising event titled, “Financial Services Dinner” on October 21, 2009, one day before a markup began on the Financial Reform Bill where sixteen of seventeen attendees were entities or individuals registered to lobby on the Financial Reform Bill. In addition, Representative Campbell held a fundraiser on December 9, 2009, two days before the House voted on the Financial Reform Bill. All six attendees represented entities or individuals registered to lobby on the Financial Reform Bill. In the evening, Representative Campbell held a second fundraiser and ten of eleven attendees represented entities or individuals registered to lobby on the Financial Reform Bill. Representative Campbell authored six amendments in markup and offered three amendments to the Rules Committee for floor debate.

B. JURISDICTIONAL STATEMENT

3. The allegations that were the subject of this review concern Representative Campbell, a Member of the United States House of Representatives from the 48th District of California. The Resolution the United States House of Representatives adopted creating the Office of Congressional Ethics (hereafter “OCE”) 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 after March 11, 2008, review by the Board is in accordance with the Resolution.

¹H. Res 895, 110th Cong. § 1(e) (2008) (as amended).

C. PROCEDURAL HISTORY

4. The OCE received a written request for a preliminary review in this matter signed by at least two members of the Board on May 24, 2010. The preliminary review commenced on May 25, 2010.² The preliminary review was scheduled to end on June 23, 2010.

5. At least three members of the Board voted to initiate a second-phase review in this matter on June 21, 2010. The second-phase review commenced on June 24, 2010.³ The second-phase review was scheduled to end on August 7, 2010.

6. The Board voted to extend the forty-five day second-phase review by an additional fourteen days, as provided by the Resolution, on July 29, 2010. Following the extension, the second-phase review was scheduled to end on August 21, 2010.⁴

7. The Board voted to refer the matter to the Committee on Standards of Official Conduct and adopted these findings on August 27, 2010.

8. This report and findings were transmitted to the Committee on Standards of Official Conduct on September 1, 2010.

D. SUMMARY OF INVESTIGATIVE ACTIVITY

9. The investigation required the collection of evidence from a number of sources.

10. The OCE requested and received documentary and, in some cases testimonial evidence, from the following sources:

- (1) Representative Campbell;
- (2) Representative Campbell's Chief of Staff;
- (3) Representative Campbell's Legislative Assistant;
- (4) Representative Campbell's Fundraiser; and
- (5) Chairman of the Financial Services Committee.

11. The OCE requested and received documentary information from the following sources:

- (1) ACE Group Holdings;
- (2) American Society of Anesthesiologists;
- (3) Ameriprise Financial;
- (4) Commercial Real Estate Finance Council;
- (5) Credit Suisse;
- (6) Edison International;
- (7) KPMG;
- (8) National Association of Realtors;
- (9) New York Life;
- (10) Securities Industry and Financial Markets Association;
- (11) Sempra Energy;
- (12) TIAA-CREF;
- (13) UBS;
- (14) Capital One Financial;
- (15) Credit Union National Association;

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

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

⁴*Id.* at § 1(c)(2)(A)(ii) (2008).

- (16) Morgan Stanley;
- (17) Chubb Corporation;
- (18) MasterCard;
- (19) General Electric;
- (20) Citigroup;
- (21) PriceWaterhouseCoopers;
- (22) American Optometrists Association;
- (23) Bank of America;
- (24) Verizon;
- (25) NAIOP (Commercial Real Estate Development Association); and
- (26) Investment Company Institute.

II. REPRESENTATIVE CAMPBELL'S OCTOBER AND DECEMBER 2009 FUNDRAISING EVENTS

A. HOUSE PRECEDENT, RULES, AND STANDARDS OF CONDUCT

12. The House of Representatives intends that Members adhere to the standards of conduct stated in Rule 23 of the Rules of the House and other relevant Rules of the House in the House Ethics Manual, the Code of Ethics for Government Service, and various precedents of the House and the Committee on Standards of Official Conduct ("Standards Committee") in matters related to ethics. In establishing the OCE, the House charged the Board of the OCE with assisting it in the enforcement of these standards of conduct.

13. In this matter, as the citations below indicate, the Board reviewed the conduct at issue under the pertinent standards set out in the House Ethics Manual and the memorandum of the Chair and Ranking Member of the Standards Committee in the matter of Representative Tom DeLay ("DeLay Report"). The cited sections in the House Ethics Manual and the DeLay Report relate to the propriety of certain types of political fundraising activity conducted in proximity to pending business of the House and its committees. The Board respects the final authority of the Standards Committee in matters referred to it by the OCE for the Standards Committee to determine whether conduct apparently proscribed by this or other standards is deemed to be a violation. In this matter, as with all referrals to the Standards Committee for further review, the OCE Board reaches no conclusion that a violation has occurred but only determines if there is substantial reason to believe that a violation may have occurred.

14. The OCE Board sees its responsibility to assess the apparent applicability of standards of conduct to the facts and circumstances of the conduct adduced during its time-limited process and under its prescribed authority. It has done so in this matter. It would be inappropriate for the OCE Board to interpret the standard expressed in the DeLay Report differently than indicated by the precedents and writings of the Standards Committee.

15. *"It is probably not wrong for the campaign managers of a legislator ... to request contributions from those for whom the legislator has done appreciable favors, but this should never be presented as a payment for the services rendered. Moreover, the possibility of such a contribution should never be suggested by the legislator or his staff at the time the favor is done. Furthermore, a de-*

cent interval of time should be allowed to lapse so that neither party will feel that there is a close connection between the two acts. The Standards Committee has long advised Members and staff that they should always exercise caution to avoid even the appearance that solicitations of campaign contributions are connected in any way with an action taken or to be taken in their official capacity.”⁵

16. “[N]o solicitation of a campaign or political contribution may be linked to an action taken or to be taken by a Member or employee in his or her official capacity.”⁶ “In addition, a Member may not accept any contribution that is linked with any specific official action taken or to be taken by that Member.”⁷

17. “[T]he scope of the House standards of conduct in this area is broader than that of the criminal bribery statute . . . the House standards of conduct generally preclude any link between the solicitation or receipt of a contribution and a specific official action.”⁸

18. “Put another way, there are fundraising activities that do not violate any criminal statute but may well violate House standards of conduct.”⁹

19. “[T]here are certain proffered campaign contributions that must be declined, and certain fundraising opportunities that must be forgone, solely because they create an appearance of improper conduct.”¹⁰

20. “The broad House standards of conduct in this area . . . are extremely important ones.”¹¹

21. These standards were expressly addressed in the DeLay Report. In that matter, a June 2002 energy industry fundraiser was held for Representative DeLay, coordinated by a former DeLay staffer working as a lobbyist and various energy industry lobbyists. Five energy companies and their executives attended the event.¹² Three months later in September 2002, during a House-Senate conference over a broad-sweeping energy bill, Representative DeLay took part in the conference as an appointed conferee.

22. The Standards Committee specifically noted the following factors in finding that Representative DeLay’s fundraising activity did not conform to House standards: (1) Representative DeLay’s position of influence on certain legislation; (2) the timing¹³ of the

⁵ House Ethics Manual at 147 (2008).

⁶ *Id.*

⁷ Memorandum of the Chairman and Ranking Minority Member, Recommendations for disposition of the complaint filed against Representative DeLay, found at <http://ethics.house.gov/Investigations/Default.aspx?Section=18>.

⁸ *Id.*

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.*

¹² *Id.* As early as late April 2002, executives from a company that would later attend the June 2002 fundraising event informed the Standards Committee that they were aware of a summer fundraiser for Representative DeLay that could affect their business interests. Further, at the event, Representative DeLay, his legislative staffer focused on energy issues, and his staff counsel, engaged in direct contact with attendees, often discussing a broad range of energy policy issues. The Standards Committee, in finding that certain fundraising activity “did not conform to House standards,” expressly found that “(1) neither Representative DeLay nor anyone acting on his behalf improperly solicited contributions from Westar, and (2) Representative DeLay took no action with regard to Westar that would constitute an impermissible special favor.” Thus, the Standards Committee’s findings not only analyzed an appearance standard absent any finding of improper solicitation of campaign contributions, but it also did so regardless of the ultimate position Representative DeLay took on the energy bill.

¹³ The Standards Committee took a broad view of “timing” standards stating that “[i]n particular, there was the timing of the fundraiser, *i.e.*, it took place just as the House-Senate conference on major energy legislation, H.R. 4, was about to get underway.” *Id.* (emphasis added.)

fundraiser in connection to certain legislative activity under consideration by the House; (3) the nature of the fundraising event; (4) the presence of key staff members at the event; and (5) the limited number of attendees in direct contact with both Representative DeLay and his staff.¹⁴ In determining whether a matter warrants further review, the OCE compared conduct at issue to these factors as detailed below.

B. POSITION OF INFLUENCE

23. Representative Campbell is a Member of the House Financial Services Committee.¹⁵

24. During the markup of the Financial Reform Bill, he authored six amendments and following markup he offered three amendments to the Rules Committee for consideration on the House floor.¹⁶

C. TIMING OF FUNDRAISING EVENTS

25. Representative Campbell held one “Financial Services Dinner” in October 2009. He also held two fundraising events in December 2009.¹⁷ His October 21, 2009 fundraising event was held one day before a markup of the Financial Reform Bill, which occurred on October 22, 2009. His two December 9, 2009 fundraising events were both held two days before the final vote on the Financial Reform Bill, which occurred on December 11, 2009.

26. Representative Campbell’s professional fundraiser stated that the December 9th evening event with Representative Cantor must have been planned three months prior because “you can’t get Representative Cantor to an event otherwise.”¹⁸ He also told the OCE that the December 9th noon event with Representative Nunes was “probably” scheduled in October and that invitations to the event would have gone out before Thanksgiving.¹⁹

27. The Board notes that the Chairman of the Financial Services Committee told the OCE that Members would have known in November 2009 that the Financial Reform Bill would be out of committee and on the House floor for a final vote in December 2009.²⁰

D. NATURE OF FUNDRAISING EVENTS

28. Representative Campbell’s professional fundraiser described his process for organizing a fundraiser as follows:

- a. He begins the fundraising process by sending an email to the Member’s scheduler to confirm what dates are available for

¹⁴ *Id.*

¹⁵ Committee on Financial Services Membership, found at <http://financialservices.house.gov/singlepages.aspx?NewsID=397>.

¹⁶ Committee on Financial Services Markups for the 111th Congress, found at <http://financialservices.house.gov/Hearings/markups.aspx>; Summary of Amendments Submitted to the Rules Committee for H.R. 4173—Wall Street Reform and Consumer Protection Act of 2009, found at http://rules.house.gov/amendment_details.aspx?NewsID=4516.

¹⁷ Memorandum of Interview of Representative Campbell, July 22, 2010 (“Representative Campbell MOI”) (Exhibit 1 at 10–4283_0003–4).

¹⁸ Memorandum of Interview of Representative Campbell’s fundraiser, July 23, 2010 (“Representative Campbell’s Fundraiser MOI”) (Exhibit 2 at 10–4283_0007).

¹⁹ *Id.*

²⁰ Memorandum of Interview of the Chairman of the Financial Services Committee, July 29, 2010 (Exhibit 3 at 10–4283_0007).

events.²¹ He prefers to plan events two to three months prior and no later than one and a half months prior to the event.²²

b. Once he selects the dates for the events, Representative Campbell's fundraiser then reconfirms the client's availability with the scheduler.²³ He then picks venues and sends invitations.²⁴ He sends between 500 and 2500 invitations for every event.²⁵ The day before the event he sends the RSVP list to Representative Campbell's Chief of Staff.²⁶

c. When Representative Campbell's fundraiser sends invitations, they are always to approximately 500 to 2500 invitees.²⁷ All his clients have between 500 and 2500 names in their respective fundraising databases.²⁸

d. Representative Campbell's fundraiser will send follow-up emails before the event, but there is never a time when they "want twenty specific people in a room."²⁹ He stated that the follow-up email goes to the same, full list of invitees and sometimes to an even bigger list.³⁰

²¹ Representative Campbell's Fundraiser MOI (Exhibit 3 at 10-4283__0006).

²² *Id.*

²³ *Id.*

²⁴ *Id.*

²⁵ *Id.*

²⁶ *Id.*

²⁷ *Id.*

²⁸ *Id.*

²⁹ *Id.* at 0007.

³⁰ *Id.*

29. Representative Campbell held a "Financial Services Dinner" on October 21, 2009.³¹

You are cordially invited to a

Financial Services Dinner

Honoring

Congressman John Campbell
(CA-48)

*House Committee on Financial Services
House Committee on the Budget*

Wednesday, October 21st
6:00 p.m.

Finemondo
1319 F Street NW

Suggested Contribution:
Host: \$2,000 per PAC/\$1,000 per Individual
Attend: \$1,000 per PAC/\$500 per Individual

Please RSVP to:
Jon Graham or Mike Gula
at 202-302-██████ or mail
██████@gulagraham.com

Please make checks payable to:
Campbell for Congress
700 12th Street NW – Suite 700
Washington, DC 20005

³¹ Representative Campbell MOI (Exhibit 1 at 10-4283__0003); Exhibit 4 at 10-4283__0012.

31. The Board notes the following internal KPMG email on October 16, 2009, regarding Representative Campbell's October 21, 2009 "Financial Services Dinner."³³ The KPMG employee asks, in response to Representative Campbell's October 21, 2009 event solicitation, "[i]s it wrong for me to reply and say that's not such a good night given that we have this crucial piece of legislation being marked up the next day."

To: [REDACTED]@aicpa.org; [REDACTED]@aicpa.org;

Subject: RE: Dinner for CPA John Campbell - Next Wednesday, October 21

Sent: Fri 10/16/2009 6:19:03 PM

From: McLucas, Scott

Is it wrong for me to reply and say that's not such a good night given that we have this crucial piece of legislation being marked up the next day....

Scott McLucas
 Director, Federal Government Affairs
 KPMG LLP
 2001 M Street, NW
 Washington, DC 20036

202-533-[REDACTED] (ph)
 202-533-8516 (fax)
 [REDACTED] (cell)

From: [REDACTED]@us.pwc.com [mailto:[REDACTED]@us.pwc.com]

Sent: Friday, October 16, 2009 1:47 PM

To: McLucas, Scott; [REDACTED]@ey.com; [REDACTED]@deloitte.com; [REDACTED]@ey.com; [REDACTED]@aicpa.org; [REDACTED]@aicpa.org; [REDACTED]@aicpa.org; [REDACTED]@crowechizek.com; [REDACTED]@GT.com

Cc: [REDACTED]@gulagraham.com

Subject: Dinner for CPA John Campbell - Next Wednesday, October 21

Importance: High

Hi All-

I know there are many events to choose from this time of year, but wanted to bring the event below for one of our favorite CPA's John Campbell to your attention. It's a small, financial services dinner - would be great to have a strong presence from the profession there on Wednesday.

Please let me and Jon know if you can make it.

Amy

You are cordially invited to a

Financial Services Dinner

³³ Exhibit 6 at 10-4283__0016-18.

32. Representative Campbell held a fundraising luncheon on December 9, 2009.³⁴

33. Representative Campbell stated that the December 9, 2009 event with Congressman Nunes was a small, sit-down event.³⁵ There were approximately four attendees; however Representative Campbell did not remember who they were.³⁶

You are cordially invited to a

Luncheon

Honoring

Congressman John Campbell
(CA-48)
*House Committee on Financial Services
Subcommittee on Capital Markets, Insurance & Government Sponsored Enterprises
Subcommittee on Financial Institutions & Consumer Credit
House Committee on the Budget*

With Special Guest

Congressman Devin Nunes

Wednesday, December 9th
Noon

The Capitol Hill Club
300 First Street SE

Suggested Contribution:
Attend: \$1,000 per PAC or \$500 per Individual
Co-Host: \$2,000 per PAC or \$1,000 per Individual

Please RSVP to:
Jon Graham or Mike Gula
at 202-302-██████ or e-mail
██████@gulagraham.com

Please make checks payable to:
Campbell for Congress
700 12th Street NW – Suite 700
Washington, DC 20005

³⁴ Representative Campbell MOI (Exhibit 1 at 10-4283_0003); Exhibit 7 at 10-4283_0020.

³⁵ Representative Campbell MOI (Exhibit 1 at 10-4283_0004).

³⁶ *Id.*

34. According to the attendance list provided by Representative Campbell, of the six attendees present at the December 9, 2009 luncheon event, all were either registered to lobby on the Financial Reform Bill or were representatives of entities registered to lobby on the Financial Reform Bill.³⁷

12-9 Nunes Lunch						
ATTENDED	FIRST NAME	LAST NAME	PAC	AMOUNT	PAID	OUTSTANDING
	Denise	Ferguson	Ameriprise Financial	\$ 1,000.00	\$ 1,000.00	\$ -
	Mike	Townsend	Charles Schwab	\$ 1,000.00	\$ 1,000.00	\$ -
	Jerry	Giovaniello	Nat'l Assn of Realtors	\$ 1,000.00	\$ 1,000.00	\$ -
	Tim	Ransdell	Sempra Energy	\$ 1,000.00	\$ 1,000.00	\$ -
	Manny	Bonilla	American Society of Anesthesiologists	\$ 1,000.00	\$ 1,000.00	\$ -
	Michelle	Holiday	Edison Intl	\$ 1,000.00	\$ 1,000.00	\$ -
			TOTALS	\$ 6,000.00	\$ 6,000.00	\$ -

35. Representative Campbell held an evening fundraising event on December 9, 2009.³⁸

³⁷ Exhibit 8 at 10-4283_0022. See also Lobbyist Disclosure Database, U.S. House of Representatives, available at <http://lobbyingdisclosure.house.gov/index.html>.

³⁸ Exhibit 9 at 10-4283_0024.

36. Representative Campbell stated that the December 9, 2009 evening event with Representative Cantor was similar.³⁹ It was a stand-up event, but the format was the same.⁴⁰

You are cordially invited to a

**California Wine Tasting
Reception**

In honor of

Congressman John Campbell
(CA-48)
House Committee on Financial Services

With Special Guest

Republican Whip Eric Cantor

Wednesday, December 9th
5:00 p.m.

123 D St, SE

Suggested Contribution:
Co-Host: \$2,000 per PAC or \$1,000 per Individual
Attend: \$1,000 per PAC or \$500 per Individual

Please RSVP to:
Jon Graham or Mike Gula
at 202-302-██████ or e-mail
██████@gulagraham.com

Please make checks payable to:
Campbell for Congress
700 12th Street NW – Suite 700
Washington, DC 20005

³⁹ Representative Campbell MOI (Exhibit 1 at 10-4283__0004).

⁴⁰ *Id.*

37. According to the attendance list provided by Representative Campbell, of the eleven attendees present at the December 9, 2009 dinner event, ten⁴¹ were either registered to lobby on the Financial Reform Bill or were representatives of entities registered to lobby on the Financial Reform Bill.⁴²

12-9 Cantor CA Wine Tasting						
ATTENDEE	FIRST NAME	LAST NAME	PAC	AMOUNT	PAID	OUTSTANDING
	Marc	Cadin	AALU	\$ -	\$ -	\$ -
	Peter	Kovitz	AICPA	\$ -	\$ -	\$ -
	Jamie	Clark	American Bankers Assn	\$ -	\$ -	\$ -
	Justin	Aices	American Land Title Assn	\$ -	\$ -	\$ -
	Lawrence	Wilcox	Capitol Tax Partners	\$ 500.00	\$ 500.00	\$ -
	Sam	Lancaster	Comcast	\$ 1,000.00	\$ 1,000.00	\$ -
	Brian	Reilly	Commercial Mortgage Securities Association	\$ 2,000.00	\$ 2,000.00	\$ -
	Charley	Landgraf	Dewey Lebeauf	\$ 500.00	\$ 500.00	\$ -
	Eric	Cantor	ERIC PAC	\$ 5,000.00	\$ 5,000.00	\$ -
	Mike	Markarian	Humane Society	\$ 1,000.00	\$ 1,000.00	\$ -
	Aquiles	Suarez	NAIOP	\$ 1,000.00	\$ 1,000.00	\$ -
	Ricky	Sindel	Reinsurance Assn of America	\$ 1,000.00	\$ 1,000.00	\$ -
	Paul	Nage				
TOTALS				\$ 12,000.00	\$ 12,000.00	\$ -

38. The Board notes that Representative Campbell's fundraiser sent "follow-up" emails to financial services entities. For example, Representative Campbell's fundraising group specifically solicited financial services entities for attendance at a December 9, 2009 fundraising event.⁴³ Both PriceWaterhouseCoopers and MasterCard were registered to lobby on the Financial Reform Bill.⁴⁴

From: Jon Graham <[REDACTED]@gulagraham.com>
Sent: Wednesday, December 2, 2009 2:38 PM
To: [REDACTED]PwC@Americas-US
Subject: 2 Great Events for John Campbell

Mike - I wanted to get 2 great opportunities over to you to help John Campbell before the end of the year, BOTH are on December 9th.

Lunch (Noon) at the Capitol Hill Club w/ Special Guest Congressman Devin Nunes
 please note this event was originally scheduled for Dec 8th, it is NOW the 9th

CA Wine Tasting Reception (5:00 p.m.) at 123 D Street SE w/ Special Guest GOP Whip Eric Cantor

Suggested contribution is 1k per PAC or \$500 individual, but ANY help you have left for John before the end of the year is much appreciated.

Do you think you can help John out before the end of the year ?

Thanks so much,

Jon

⁴¹ The last name appearing on the list may have been a stand-in for the previous individual who did not attend.

⁴² Exhibit 10 at 10-4283_0026. See also Lobbyist Disclosure Database, U.S. House of Representatives, available at <http://lobbyingdisclosure.house.gov/index.html>.

⁴³ Exhibit 11 at 10-4283_0027, 32.

⁴⁴ See Lobbyist Disclosure Database, U.S. House of Representatives, available at <http://lobbyingdisclosure.house.gov/index.html>.

From: Jon Graham <[REDACTED]@gulagraham.com>
Sent: Wednesday, December 2, 2009 7:36 PM (GMT)
To: Tucker Foote <[REDACTED]@mastercard.com>
Subject: 2 Great Events for John Campbell

Tucker - I wanted to get 2 great opportunities over to you to help John Campbell before the end of the year, BOTH are on December 9th.

Lunch (Noon) at the Capitol Hill Club w/ Special Guest Congressman Devin Nunes
 please note this event was originally scheduled for Dec 8th. it is NOW the 9th

CA Wine Tasting Reception (5:00 p.m.) at 123 D Street SE w/ Special Guest GOP Whip Eric Cantor

Suggested contribution is 1k per PAC or \$500 individual, but ANY help you have left for John before the end of the year is much appreciated.

Do you think you can help John out before the end of the year ?

Thanks so much.

Jon

39. The Board notes further that Representative Campbell's fundraising group also specifically solicited representatives from UBS, Capital One Financial, Citigroup, Credit Union National Association, Morgan Stanley, Chubb Corporation, KPMG, General Electric, New York Life, Securities Industry and Financial Markets Association, American Optometrists Association, Credit Suisse, Bank of America, Verizon, NAIOP (Commercial Real Estate Development Association), and Investment Company Institute throughout the time period the House considered the Financial Reform Bill.⁴⁵ All entities were registered to lobby on the Financial Reform Bill.⁴⁶

⁴⁵ Exhibit 11 at 10-4283_0027-87.

⁴⁶ See Lobbyist Disclosure Database, U.S. House of Representatives, available at <http://lobbyingdisclosure.house.gov/index.html>.

40. In addition, an employee from the firm retained by Representative Campbell offered an employee of Morgan Stanley a “one-on-one” meeting with Representative Campbell, through part of the period when the final Financial Reform Bill was under consideration by the House.⁴⁷ The Board notes that while the communication does not solicit a campaign contribution, the email was sent from Representative Campbell’s fundraising group and not his legislative staff.

From: Katy Cannon
To: Wilsusen, Joshua (GOVTREL)
Sent: 12/3/2009 1:39:47 PM
Subject: Rep. Campbell 1-1 Meet and Greet?

Hi Josh- I thought you might be interested in a one on one meet and greet coffee with Congressman John Campbell. Have you gotten a chance to talk with him yet? He is a great member on Financial Services and really enjoys getting to sit down and get to know people. Please let me know if you are interested and I am happy to set something up. Below are a few times he is available.

Dec. 8 10:00, 10:30, 11:00, 11:30, 1:00, 1:30, 2:00, 2:30

Dec. 9 10:00, 10:30, 11:00, 11:30, 1:00, 1:30, 2:00, 2:30

Dec. 15 10:00, 10:30, 11:00, 11:30, 1:00, 1:30, 2:00, 2:30

Dec. 16 10:00, 10:30, 11:00, 11:30, 3:00, 3:30, 4:00, 4:30

Dec. 17 10:00, 10:30, 11:00, 11:30, 1:00, 1:30, 2:00, 2:30

Thanks!

Best,

Katy

⁴⁷ Exhibit 12 at 10-4283__0089.

41. Earlier, during a markup of the Financial Reform Bill,⁴⁸ an employee from the firm retained by Representative Campbell offered an employee of NAIOP a “one-on-one” meeting with Representative Campbell.⁴⁹ Here the Board notes that a campaign contribution was specifically solicited.

From: Katy Cannon [REDACTED]@gulagraham.com]
Sent: Wednesday, November 18, 2009 10:41 AM
To: Aquiles Suarez
Subject: Rep. John Campbell 1-1 coffee or lunch? Any interest?

Hi Aquiles-

I wanted to see if there is any way National Assn of Industrial and Office Properties (NAIOP) can help out Congressman John Campbell before the end of the quarter. We really appreciate your generous support last cycle. It was a big help. Congressman Campbell wanted me to see if you are available to do a 1-1 coffee or lunch with him. He prefers these to big events. Is there any way you can do \$1K or even \$500 to help him out? He has a councilwoman running against him and Obama carried his district last cycle. Thanks so much. Let me know if you are free any of the following times and I am happy to set something up.

Wed. 12/2 -After 10am
 Thurs. 12/3 -10am-2pm

Tues.12/8 -After 10am
 Wed. 12/9 -After 10am
 Thurs. 12/10 -10am- 2pm

Tues. 12/15 - After 10am
 Wed. 12/15 - 10am-1pm, After 3pm
 Thurs. 12/16 - After 10am

Thanks!

Best,
 Katy

42. The Board notes that Representative Campbell’s fundraising group also specifically solicited representatives from Bank of America, Chubb Corporation, MasterCard, and New York Life for “one-on-one” meetings with Representative Campbell throughout the time period the House considered the Financial Reform Bill.⁵⁰

E. PRESENCE OF KEY STAFF

43. Representative Campbell’s Chief of Staff was present at the October 21, 2009 fundraising event and both December 9, 2009 fundraising events.⁵¹

44. Representative Campbell’s Legislative Assistant for financial services was present at the October 21, 2009 fundraising event and both December 9, 2009 fundraising events.⁵² He told the OCE the following:

a. Representative Campbell’s Legislative Assistant has never been told to go to a fundraising event and has never been invited to one by Representative Campbell or the Chief of

⁴⁸ Committee on Financial Services Markups for the 111th Congress, found at <http://financialservices.house.gov/Hearings/hearingDetails.aspx?NewsID=799>.

⁴⁹ Exhibit 12 at 10-4283__0091.

⁵⁰ *Id.* at 0089-97.

⁵¹ Memorandum of Interview of Representative Campbell’s Chief of Staff, July 20, 2010 (Exhibit 13 at 10-4283__0100).

⁵² Memorandum of Interview of Representative Campbell’s Legislative Assistant, July 23, 2010 (Exhibit 14 at 10-4283__0104).

Staff.⁵³ When he sees a fundraising event on Representative Campbell's calendar that he wants to attend, he will ask if he can go to the event. The names of the expected attendees are also on the calendar.⁵⁴ If he sees names he recognizes, he will go to the event.⁵⁵

(b) The only other staff he sees at fundraising events is the Chief of Staff, who attends "quite a few," and the Legislative Director, who sometimes attends.⁵⁶ Representative Campbell's Legislative Assistant attends approximately seventy-five percent of Representative Campbell's events held in Washington, DC.⁵⁷

(c) He recalled speaking to several people and specifically speaking to a representative of the American Bankers Association at the December 9, 2009 evening event.⁵⁸

F. LIMITED NUMBER OF ATTENDEES

45. At the October 21, 2009 event, the attendance list provided to the OCE shows seventeen attendees.

46. At the December 9, 2009 luncheon event, the attendance list provided to the OCE shows six attendees.

47. At the December 9, 2009 evening event, the attendance list provided to the OCE shows eleven attendees.

III. CONCLUSION

48. In conclusion, based on evidence available to the OCE, Representative Campbell held a fundraising event titled, "Financial Services Dinner" on October 21, 2009, one day before a markup on the Financial Reform Bill where sixteen of seventeen attendees were entities or individuals registered to lobby on the Financial Reform Bill. In addition, Representative Campbell held a fundraiser on December 9, 2009, two days before the House voted on the Financial Reform Bill. All six attendees represented entities or individuals registered to lobby on the Financial Reform Bill. In the evening, Representative Campbell held a second fundraiser and ten of eleven attendees represented entities or individuals registered to lobby on the Financial Reform Bill. His key financial services staff members were present at all the events. Further, Representative Campbell's fundraiser specifically solicited financial services entities for campaign contributions, offering one-on-one meetings with Representative Campbell during House consideration of the Financial Reform Bill. Representative Campbell, a member of the Committee on Financial Services, authored six amendments in markup and offered three amendments to the Rules Committee for floor debate.

49. For these reasons, the Board recommends that the Committee on Standards of Official Conduct further review the above allegations because there is a substantial reason to believe that Representative Campbell solicited or accepted contributions in a

⁵³ *Id.* at 0103.

⁵⁴ *Id.*

⁵⁵ *Id.*

⁵⁶ *Id.* at 0104.

⁵⁷ *Id.*

⁵⁸ *Id.*

manner which gave the appearance that special treatment or access was provided to donors or that contributions were linked to an official act.

IV. INFORMATION THE OCE WAS UNABLE TO OBTAIN AND RECOMMENDATIONS FOR THE ISSUANCE OF SUBPOENAS

50. In every instance, the OCE asked the recipient of an OCE Request for Information to identify any information they withheld and the reason they were withholding it. However, absent the authority to subpoena the evidence in possession of the witness, it is impossible for the OCE to verify if information was withheld, but not documented.

51. The OCE included with its Request for Information, a “Request for Information Certification” document that asked those identified by the OCE to “certify that I have provided the Office of Congressional Ethics all information requested in the Request for Information, dated June 1, 2010, and if I have not provided a requested document or certain information, then I have identified the document or information that was not available or withheld and why it was not available or withheld. This certification is given subject to 18 U.S.C. § 1001 (commonly known as the False Statements Act).”

52. Of the 26 third party entities discussed above, the following returned the certification:

- (1) NAIOP (Commercial Real Estate Development Association); and
- (2) National Association of Realtors.

53. The following third parties provided documents but did not return the certification.

- (1) Citigroup;
- (2) PriceWaterhouseCoopers;
- (3) Ameriprise Financial;
- (4) Credit Suisse;
- (5) New York Life;
- (6) Securities Industry and Financial Markets Association;
- (7) Chubb Corporation;
- (8) Capital One Financial;
- (9) MasterCard;
- (10) Credit Union National Association;
- (11) Morgan Stanley;
- (12) TIAA-CREF;
- (13) American Optometrists Association;
- (14) Bank of America; and
- (15) Verizon.

54. The following third parties informed the OCE that they would not be providing all of the information requested or did not provide all of the information requested:

- (1) Investment Company Institute;
- (2) Edison International;
- (3) UBS;
- (4) General Electric; and
- (5) KPMG.

55. The following third-parties provided no information to the OCE:

- (1) ACE Group Holdings;
- (2) Sempra Energy;
- (3) American Society of Anesthesiologists; and
- (4) Commercial Real Estate Finance Council.

EXHIBIT 1

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 John Campbell
Review #: 10-4283
Date: July 22, 2010
Location: Rayburn HOB
Time: 10:10 a.m. – 11:00 a.m. (approximate)
Participants: Omar Ashmawy
Paul Solis
Michael Toner
Brandis Zehr

Summary: Representative John Campbell represents the 48th District of California. The OCE requested an interview with Representative Campbell and he consented to an interview. Representative Campbell made the following statements in response to our questioning:

1. Representative Campbell was given an 18 U.S.C. § 1001 warning and signed the written acknowledgement of the warning, which will be placed in the case file in this review. The witness consented to an interview on July 22, 2010.
2. The witness told the OCE that his office operates like most offices in Congress. He has a Chief of Staff, a Legislative Director and Legislative Assistants who report to the Legislative Director. The only aspect of the office that is unique is that they have a legislative person in their district office.
3. His staff works independently. For instance, the staff member responsible for financial services issues, Wesley McClelland, can come to the Member directly. The witness' Chief of Staff and Legislative Director supervise Mr. McClelland's time, but he does not necessarily have to run matters by them before bringing them to Representative Campbell.
4. The Chief of Staff is involved in legislative issues, but does not "get into the weeds."
5. The Congressman's fundraising efforts are run by two people. A person in his district and Mike Graham, who plans his Washington, DC fundraisers. Mr. Graham plans all the events and the Congressman goes to them. The Member has almost no involvement in the planning of fundraising events. He has no role in picking dates for the fundraisers. He does not know when they are until he looks at his calendar. At most, he might look at his calendar a week ahead, but because it changes so frequently he typically only looks at it the day before.

CONFIDENTIAL

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

6. The Congresssman does not make fundraising calls. He made a few when he first got elected, but did not enjoy making them. He has not made any since. No member of his Congressional staff makes fundraising calls either.
7. The witness will meet with Mr. Graham two or three times a year at most. The only specific event that the witness has spoken to Mr. Graham about was an event in the district that they recently held.
8. The Congressman's staff is not required to go to fundraisers, nor are they prohibited from attending. They may attend, but it is of their own volition. The fundraisers are on the witness' calendar which is available to the whole office. The attendees are also on his calendar. Members of his staff may know an attendee from work or because they are a friend and sometimes ask if they can attend.
9. The witness did not know how far ahead the fundraisers are planned or when they are put on his calendar. He is "completely detached" from the process until the day before when he checks his calendar.
10. The witness did not know who puts the dates on his calendar. He assumed his Scheduler, but did not know if Mr. Graham sent the dates to his Scheduler or to his Chief of Staff.
11. The witness was shown a flyer for an October 21, 2009 fundraiser.
12. The witness saw the invitation for the first time yesterday when his attorney showed it to him. He did not recall the event in any detail. While fundraisers had been held at the restaurant before, they were luncheons. Based on the time on the invitation this was a dinner and the witness did not recall a dinner at the venue. He could not remember who attended or how large an event it was.
13. However, generally the witness was able to describe the type of conversation had at his fundraisers. He explained that 50% or more of the conversation is about politics and about specific elections occurring in his home state. Most of the conversation is political because it is not appropriate to discuss such things in his Congressional office so "this is where you can have them." Approximately 20-25% of the conversation is personal – questions about his wife, his kids, or his collection of cars. The remainder of the conversation is a "50,000 ft level what's going on in Congress." People will ask about the "big bills" and what the Member thought about them. The witness might say how "good they are or how bad they are," but that is the extent of the conversation.
14. While he did not remember the October 21, 2009 event, he presumed the conversation was along these lines. However, he did not have any personal memory of it.
15. The witness was shown the invitation for two December 9, 2009 events.
16. He had never seen the invitations until yesterday when his attorney showed them to him. He had a better memory of the events because it was rare to have guest Members of Congress at an event.

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

17. He recalled that the event with Congressman Nunes was a small, sit down event. There were approximately four attendees, however the witness did not remember who they were. The format of the event was somewhat different because Congressman Nunes was the guest. The witness made small talk with the attendees until Congressman Nunes arrived and then Rep. Nunes spoke to the group.
18. The event with Rep. Cantor was similar. It was a stand-up event, but the format was the same. The witness made small talk with the guests until Rep. Cantor arrived and then Rep. Cantor spoke.

I prepared this Memorandum of Interview on July 22, 2010 after interviewing Representative John Campbell on July 22, 2010 based on the notes staff prepared during the interview. I certify that this memorandum contains all pertinent matter discussed with Representative John Campbell on July 22, 2010.

Omar Ashmawy
Investigative Counsel

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 Campbell's Fundraiser
Review #: 10-4283
Date: July 23, 2010
Location: 1155 F Street, NW, Washington, DC 20004
Time: 2:40 p.m. – 3:15 p.m. (approximate)
Participants: Omar Ashmawy
Paul Solis
Michael Toner
Brandis Zehr

Summary: The witness is the co-founder of The Gula Graham Group and the fundraiser for Representative Campbell who represents the 48th District of California. The OCE requested an interview with the witness and he consented to an interview. He made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and signed the written acknowledgement of the warning, which will be placed in the case file in this review. The witness consented to an interview on July 23, 2010.
2. The witness began speaking with Representative Campbell in 2008, but Representative Campbell did not become a client until 2009. His firm plans approximately 150 fundraisers per quarter.
3. The witness' process for fundraising for his clients is to initially send an email to the scheduler to see what dates are available for events. He prefers to plan events two to three months prior and no later than one and a half months prior to the event. Once he receives a client's available dates, he will compare them with the availability of his other clients. He does this to ensure that he does not plan too many events on the same day.
4. Once he selects the dates for the events, he then reconfirms the client's availability with the scheduler. He then picks venues and sends invitations. He sends between 500 and 2500 invitations for every event. The day before the event the witness sends the RSVP list to Representative Campbell's chief of Staff. He attends the event briefly and as soon as it appears the event is going well, he leaves.
5. When he sends invitations, it is always to approximately 500 to 2500 invitees. All his clients have between 500 and 2500 names in their respective databases.
6. Every client has a similar email and invitation sent on their behalf. The only thing that changes is the name.

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

7. The witness explained that it is hard to get attendees because the Republicans are in the minority. Even six to eight attendees is considered a good turnout in the current environment. The witness recently sent an invitation out for a client to almost 2000 individuals and only received 9 responses.
8. Representative Campbell does not make fundraising calls. None of the witness' clients make fundraising calls. It is a Gula Graham Group policy. As long as Representative Campbell has been a client of the witness, he has not made any fundraising calls.
9. The witness will send follow-up emails before the event, but there is never a time when "we want 20 specific people in a room." The follow-up email goes to the same, full list of invitees and sometimes to an even bigger list.
10. When asked about Representative Campbell's December 9, 2009 fundraisers, the witness stated that he would not have remembered it but for the investigation. He also explained that normally they would not have had two fundraisers on the same day, but, when there are not a lot of available dates, then it becomes necessary.
11. The event with Representative Cantor must have been planned three months prior because you can't get Representative Cantor to an event otherwise. The event with Representative Nunes was "probably" scheduled in October. Invitations to the event would have gone out before Thanksgiving.
12. Without looking at a list of attendees to an event, the witness would not remember who attended.
13. There was no industry focus to either fundraiser. Representative Campbell's fundraising is not as strong as some of the witness' other clients and so there was not a specific target. On some emails, they may put "Financial Services" event or "Energy" event, but even then the invitation doesn't only go out to that industry. The witness' firm does not ever restrict an event to a specific industry.
14. The witness was sure a staff member of Representative Campbell attended the December 9, 2009 events but did not remember who.
15. The witness' communication with Representative Campbell's staff is mainly with his Chief of Staff. The communication is principally to determine date availability and to send RSVP lists. The witness also has contact with the scheduler to get available dates for fundraisers. When he contacts the scheduler, the witness will also copy the Chief of Staff so that she is "in the loop."
16. The witness does not have access to Representative Campbell's calendar.
17. The witness recalled going to the fundraising event with Representative Cantor. The event was not as big as they had hoped – perhaps between eight to fifteen individuals. There was no industry focus to the event.

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

18. The witness' communication with Representative Campbell is limited to three to four times a year. They do not discuss logistics of specific events. Representative Campbell is "very hands off compared to other clients." Fundraising is "on the back burner" with Representative Campbell.

I prepared this Memorandum of Interview on July 29, 2010 after interviewing the witness on July 23, 2010 based on the notes staff prepared during the interview. I certify that this memorandum contains all pertinent matter discussed with the witness on July 23, 2010.

Omar Ashmawy
Investigative Counsel

EXHIBIT 3

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: Chairman of the House Financial Services Committee
 Review #s: 10-3055; 10-4283; 10-6002; 10-6028; 10-6421; 10-7308; 10-8839; 10-9353
 Date: July 29, 2010
 Location: Rayburn HOB
 Time: 5:00 p.m. – 5:15 p.m. (approximate)
 Participants: Paul Solis
 Nate Wright

Summary: The witness is the Chairman of the House Financial Services Committee. We requested an interview with the witness and he consented to an interview. The witness made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and signed the written acknowledgement of the warning, which will be placed in the case file in this review. The witness consented to an interview on July 29, 2010.
2. The witness told the OCE that nearly 90 percent of the work of the Financial Services Committee in 2009 was focused on the financial reform bill that was voted on in December. The committee held nearly twenty hearings and eight markups on various chapters of the financial reform bill.
3. The witness said that the schedule for when the bill would be voted on was constantly being talked about. The witness stated that certainly by November, Members knew that the bill would be up for a vote in December. Members would know exactly the date of the vote a week in advance. For a hearing, Members would generally receive notice a week in advance. For a markup, Members would generally receive notice a week or two in advance.
4. The witness stated that he canceled several fundraisers around key dates of the financial reform bill to avoid the perception of influence.

I prepared this Memorandum of Interview on August 2, 2010 after interviewing the witness on July 29, 2010 based on the notes staff prepared during the interview. I certify that this memorandum contains all pertinent matter discussed with the witness on July 29, 2010.

Nate Wright
Analyst

EXHIBIT 4

You are cordially invited to a

Financial Services Dinner

Honoring

Congressman John Campbell

(CA-48)

*House Committee on Financial Services
House Committee on the Budget*

Wednesday, October 21st

6:00 p.m.

Finemondo

1319 F Street NW

Suggested Contribution:

Host: \$2,000 per PAC/\$1,000 per Individual

Attend: \$1,000 per PAC/\$500 per Individual

Please RSVP to:

**Jon Graham or Mike Gula
at 202-302-████ or mail
████@gulagraham.com**

Please make checks payable to:

**Campbell for Congress
700 12th Street NW – Suite 700
Washington, DC 20005**

Paid for by Campbell for Congress

Contributions are not tax deductible as a charitable donation for federal income tax purposes. By law, the maximum amount an individual may contribute is \$7,400 per election. Federal multi-candidate PACs may contribute \$5,000 per election. Federal Election Law requires political committees to report the name, mailing address, occupation and name of employer for contributions where aggregate is in excess of \$200 in a calendar year. Contributions from corporations, foreign nationals, labor unions and federal government contractors are prohibited. Partnership checks are welcome, but please provide a written statement as to who to attribute contributions to.

CAM076

EXHIBIT 5

10-21 Dinner

ATTENDED	FIRST NAME	LAST NAME	PAC	AMOUNT	PAID	OUTSTANDING
	Ed	Hill	Bank of America	\$ 2,000.00	\$ 2,000.00	\$ -
	Rick	Olson	Capital One	\$ 1,000.00	\$ 1,000.00	\$ -
	Maura	Solomon	Citi	\$ 2,000.00	\$ 2,000.00	\$ -
	John	Anderson	Credit Suisse	\$ 2,000.00	\$ 2,000.00	\$ -
	Jennifer	Platt	ICSC	\$ 1,000.00	\$ 1,000.00	\$ -
	Steve	Patterson	JPMorgan	\$ 2,000.00	\$ 2,000.00	\$ -
	Len	Wolfson	Mortgage Bankers Assn	\$ 1,000.00	\$ 1,000.00	\$ -
	Amy	Best Coughlin	PricewaterhouseCoopers	\$ 2,000.00	\$ 2,000.00	\$ -
	Peter	Freeman	The Financial Services Roundtable	\$ 1,000.00	\$ 1,000.00	\$ -
	Dan	Archer	Wells Fargo	\$ 1,000.00	\$ 1,000.00	\$ -
	Paul	Kangas	PCI	\$ 500.00	\$ 500.00	\$ -
	Scott	McLucas	KPMG	\$ 2,500.00	\$ 2,500.00	\$ -
	Dr. Blake	Curd	Physician Hospitals of America	\$ 1,000.00	\$ 1,000.00	\$ -
	Shahira	Knight	Fidelity Investments	\$ 1,000.00	\$ 1,000.00	\$ -
	Mary Frances	Pearson	Ernst & Young	\$ 2,000.00	\$ 2,000.00	\$ -
	Michael	Thompson		\$ 500.00	\$ 500.00	\$ -
	Harmony	Allen		\$ -	\$ -	\$ -
			TOTALS	\$ 22,500.00	\$ 22,500.00	\$ -

CAM019

10-4283_0014

EXHIBIT 6

To: █████@aicpa.org|████@aicpa.org|

Subject: RE: Dinner for CPA John Campbell - Next Wednesday, October 21

Sent: Fri 10/16/2009 6:19:03 PM

From: McLucas, Scott

Is it wrong for me to reply and say that's not such a good night given that we have this crucial piece of legislation being marked up the next day....

Scott McLucas
Director, Federal Government Affairs
KPMG LLP
2001 M Street, NW
Washington, DC 20036

202-533-████ (ph)
202-533-8516 (fax)
████ (cell)

From: █████@us.pwc.com [mailto:████@us.pwc.com]
Sent: Friday, October 16, 2009 1:47 PM
To: McLucas, Scott; █████@ey.com; █████@deloitte.com; █████@ey.com; █████@aicpa.org; █████@aicpa.org; █████@aicpa.org; █████@crowchizek.com; █████@GT.com
Cc: █████@gulagraham.com
Subject: Dinner for CPA John Campbell - Next Wednesday, October 21
Importance: High

Hi All-

I know there are many events to choose from this time of year, but wanted to bring the event below for one of our favorite CPA's John Campbell to your attention. It's a small, financial services dinner - would be great to have a strong presence from the profession there on Wednesday.

Please let me and Jon know if you can make it.

Amy

You are cordially invited to a

Financial Services Dinner

Honoring

Congressman John Campbell

(CA-48)

House Committee on Financial Services

House Committee on the Budget

Wednesday, October 21st
6:00 p.m.

Finemondo
1319 F Street NW

Suggested Contribution:

Host: \$2,000 per PAC/\$1,000 per Individual

Attend: \$1,000 per PAC/\$500 per Individual

Please RSVP to:

Jon Graham or Mike Gula

at 202-302-████ or mail

████@gulagraham.com

Please make checks payable to:

Campbell for Congress

700 12th Street NW – Suite 700

Washington, DC 20005

Paid for by Campbell for Congress

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Amy Best Coughlin
Government, Regulatory Affairs & Public Policy
PricewaterhouseCoopers, LLP
1301 K Street, NW – Suite 600 West
Washington, DC 20005
Phone: 202-312-
E-Mail: @us.pwc.com

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EXHIBIT 7

You are cordially invited to a

Luncheon

Honoring

Congressman John Campbell

(CA-48)

House Committee on Financial Services

Subcommittee on Capital Markets, Insurance & Government Sponsored Enterprises

Subcommittee on Financial Institutions & Consumer Credit

House Committee on the Budget

With Special Guest

Congressman Devin Nunes

Wednesday, December 9th

Noon

The Capitol Hill Club

300 First Street SE

Suggested Contribution:

Attend: \$1,000 per PAC or \$500 per Individual

Co-Host: \$2,000 per PAC or \$1,000 per Individual

Please RSVP to:

Jon Graham or Mike Gula
at 202-302-████ or e-mail
████@gulagraham.com

Please make checks payable to:

Campbell for Congress
700 12th Street NW – Suite 700
Washington, DC 20005

Paid for by Campbell for Congress

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CAM079

EXHIBIT 8

12-9 Nunes Lunch

ATTENDEE	FIRST NAME	LAST NAME	PAC	AMOUNT	PAID	OUTSTANDING
	Denise	Ferguson	Ameriprise Financial	\$ 1,000.00	\$ 1,000.00	\$ -
	Mike	Townsend	Charles Schwab	\$ 1,000.00	\$ 1,000.00	\$ -
	Jerry	Giovanello	Natl' Assn of Realtors	\$ 1,000.00	\$ 1,000.00	\$ -
	Tim	Ransdell	Sempira Energy	\$ 1,000.00	\$ 1,000.00	\$ -
	Manny	Bonilla	American Society of Anesthesiologists	\$ 1,000.00	\$ 1,000.00	\$ -
	Michelle	Holiday	Edison Int'l	\$ 1,000.00	\$ 1,000.00	\$ -
			TOTALS	\$ 6,000.00	\$ 6,000.00	\$ -

CAM021

EXHIBIT 9

You are cordially invited to a

California Wine Tasting Reception

In honor of

Congressman John Campbell (CA-48)

House Committee on Financial Services

With Special Guest

Republican Whip Eric Cantor

**Wednesday, December 9th
5:00 p.m.**

123 D St, SE

Suggested Contribution:

Co-Host: \$2,000 per PAC or \$1,000 per Individual

Attend: \$1,000 per PAC or \$500 per Individual

Please RSVP to:

Jon Graham or Mike Gula
at 202-302- or e-mail
@gulagraham.com

Please make checks payable to:

Campbell for Congress
700 12th Street NW – Suite 700
Washington, DC 20005

Paid for by Campbell for Congress

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CAM080

EXHIBIT 10

EXHIBIT 11

From: Jon Graham <[REDACTED]@gulagraham.com>
Sent: Wednesday, December 2, 2009 2:38 PM
To: [REDACTED]PwC@Americas-US
Subject: 2 Great Events for John Campbell

Mike - I wanted to get 2 great opportunities over to you to help John Campbell before the end of the year, BOTH are on December 9th.

Lunch (Noon) at the Capitol Hill Club w/ Special Guest Congressman Devin Nunes
please note this event was originally scheduled for Dec 8th, it is NOW the 9th

CA Wine Tasting Reception (5:00 p.m.) at 123 D Street SE w/ Special Guest GOP Whip Eric Cantor

Suggested contribution is 1k per PAC or \$500 individual, but ANY help you have left for John before the end of the year is much appreciated.

Do you think you can help John out before the end of the year ?

Thanks so much,

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
Washington, DC 20005
202.302. [REDACTED]

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From: Jon Graham <[REDACTED]@gulagraham.com>
Sent: Wednesday, December 2, 2009 2:38 PM
To: [REDACTED] PwC@Americas-US
Subject: 2 Great Events for John Campbell

Emily - I wanted to get 2 great opportunities over to you to help John Campbell before the end of the year, BOTH are on December 9th.

Lunch (Noon) at the Capitol Hill Club w/ Special Guest Congressman Devin Nunes
please note this event was originally scheduled for Dec 8th, it is NOW the 9th

CA Wine Tasting Reception (5:00 p.m.) at 123 D Street SE w/ Special Guest GOP Whip Eric Cantor

Suggested contribution is 1k per PAC or \$500 individual, but ANY help you have left for John before the end of the year is much appreciated.

Do you think you can help John out before the end of the year ?

Thanks so much,

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
Washington, DC 20005
202.302. [REDACTED]

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From: Jon Graham <[REDACTED]@gulagraham.com>
Sent: Wednesday, December 2, 2009 7:36 PM (GMT)
To: Tucker Foote <[REDACTED]@mastercard.com>
Subject: 2 Great Events for John Campbell

Tucker - I wanted to get 2 great opportunities over to you to help John Campbell before the end of the year, BOTH are on December 9th.

Lunch (Noon) at the Capitol Hill Club w/ Special Guest Congressman Devin Nunes
please note this event was originally scheduled for Dec 8th, it is NOW the 9th

CA Wine Tasting Reception (5:00 p.m.) at 123 D Street SE w/ Special Guest GOP Whip Eric Cantor

Suggested contribution is 1k per PAC or \$500 individual, but ANY help you have left for John before the end of the year is much appreciated.

Do you think you can help John out before the end of the year ?

Thanks so much,

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
Washington, DC 20005
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From: Jon Graham
Sent: Wednesday, December 02, 2009 07:35 PM
To: Savercool, John
Subject: 2 Great Events for John Campbell

John - I wanted to get 2 great opportunities over to you to help John Campbell before the end of the year, BOTH are on December 9th.

Lunch (Noon) at the Capitol Hill Club w/ Special Guest Congressman Devin Nunes
please note this event was originally scheduled for Dec 8th, it is NOW the 9th

CA Wine Tasting Reception (5:00 p.m.) at 123 D Street SE w/ Special Guest GOP Whip Eric Cantor

Suggested contribution is 1k per PAC or \$500 individual, but ANY help you have left for John before the end of the year is much appreciated.

Do you think you can help John out before the end of the year ?

Thanks so much,

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
Washington, DC 20005
202.302. [REDACTED]

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From: Jon Graham
Sent: Wednesday, December 02, 2009 07:38 PM
To: Donnelly, Sarah
Subject: 2 Great Events for John Campbell

Sarah - I wanted to get 2 great opportunities over to you to help John Campbell before the end of the year, BOTH are on December 9th.

Lunch (Noon) at the Capitol Hill Club w/ Special Guest Congressman Devin Nunes
please note this event was originally scheduled for Dec 8th, it is NOW the 9th

CA Wine Tasting Reception (5:00 p.m.) at 123 D Street SE w/ Special Guest GOP Whip Eric Cantor

Suggested contribution is 1k per PAC or \$500 individual, but ANY help you have left for John before the end of the year is much appreciated.

Do you think you can help John out before the end of the year ?

Thanks so much,

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
Washington, DC 20005
202.302.██████

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From: Jon Graham
Sent: Wednesday, December 02, 2009 07:39 PM
To: Rowan, Peter
Subject: 2 Great Events for John Campbell

Peter - I wanted to get 2 great opportunities over to you to help John Campbell before the end of the year, BOTH are on December 9th.

Lunch (Noon) at the Capitol Hill Club w/ Special Guest Congressman Devin Nunes
please note this event was originally scheduled for Dec 8th, it is NOW the 9th

CA Wine Tasting Reception (5:00 p.m.) at 123 D Street SE w/ Special Guest GOP Whip Eric Cantor

Suggested contribution is 1k per PAC or \$500 individual, but ANY help you have left for John before the end of the year is much appreciated.

Do you think you can help John out before the end of the year ?

Thanks so much,

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
Washington, DC 20005
202.302.████

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From: Jon Graham [REDACTED@gulagraham.com]
Sent: Wednesday, December 02, 2009 2:36 PM
To: Mangum, Lance
Subject: 2 Great Events for John Campbell

Lance - I wanted to get 2 great opportunities over to you to help **John Campbell** before the end of the year, BOTH are on **December 9th**.

Lunch (Noon) at the Capitol Hill Club w/ Special Guest Congressman Devin Nunes
please note this event was originally scheduled for Dec 8th, it is NOW the 9th

CA Wine Tasting Reception (5:00 p.m.) at 123 D Street SE w/ Special Guest GOP Whip Eric Cantor

Suggested contribution is 1k per PAC or \$500 individual, but ANY help you have left for John before the end of the year is much appreciated.

Do you think you can help John out before the end of the year ?

Thanks so much,

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
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From: Jon Graham [redacted@gulagraham.com]
Sent: Wednesday, December 02, 2009 2:38 PM
To: Weems, Emily
Subject: 2 Great Events for John Campbell

Emily - I wanted to get 2 great opportunities over to you to help **John Campbell** before the end of the year, BOTH are on **December 9th**.

Lunch (Noon) at the Capitol Hill Club w/ Special Guest Congressman Devin Nunes
please note this event was originally scheduled for Dec 8th, it is NOW the 9th

CA Wine Tasting Reception (5:00 p.m.) at 123 D Street SE w/ Special Guest GOP Whip Eric Cantor

Suggested contribution is 1k per PAC or \$500 individual, but ANY help you have left for John before the end of the year is much appreciated.

Do you think you can help John out before the end of the year ?

Thanks so much,

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
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From: Jon Graham [REDACTED]@gulagraham.com]
Sent: Wednesday, December 02, 2009 2:35 PM
To: Schellhas, Robert J [GGA]
Subject: 2 Great Events for John Campbell

Bob - I wanted to get 2 great opportunities over to you to help **John Campbell** before the end of the year, **BOTH** are on **December 9th**.

Lunch (Noon) at the Capitol Hill Club w/ Special Guest Congressman Devin Nunes
please note this event was originally scheduled for Dec 8th, it is NOW the 9th

CA Wine Tasting Reception (5:00 p.m.) at 123 D Street SE w/ Special Guest GOP Whip Eric Cantor

Suggested contribution is 1k per PAC or \$500 individual, but ANY help you have left for John before the end of the year is much appreciated.

Do you think you can help John out before the end of the year ?

Thanks so much.

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
Washington, DC 20005
202.302.[REDACTED]

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From: Mike Gula [redacted@gulagraham.com]
Sent: Thursday, November 19, 2009 2:52 PM
To: Schellhas, Robert J [GGA]
Subject: Cantor/Campbell CA Wine Tasting

Bob - I got a great event for you when you get back from Thanksgiving. Republican Whip Eric Cantor is headlining our **California Wine Tasting on Dec 9 at 5:00 PM** to support **Congressman John Campbell**.

The wine tasting will be at 123 D St, SE right around the corner from the CHC. We will have multiple wines from California to try. Any chance you can do \$500 or \$1K to help Congressman Campbell?

---if this date doesn't work but you still want to help Congressman Campbell he is doing a lunch that day (dec 9) with Congressman Nunes at the Capitol Hill Club

Thanks for the time

Mike

Michael Gula
C: [redacted]
W: 202-558-[redacted]

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From: Jon Graham [REDACTED]@gulagraham.com]
Sent: Wednesday, December 02, 2009 2:35 PM
To: Kate Abel
Subject: 2 Great Events for John Campbell

Kate - I wanted to get 2 great opportunities over to you to help John Campbell before the end of the year, BOTH are on December 9th.

Lunch (Noon) at the Capitol Hill Club w/ Special Guest Congressman Devin Nunes ***please note this event was originally scheduled for Dec 8th, it is NOW the 9th***

CA Wine Tasting Reception (5:00 p.m.) at 123 D Street SE w/ Special Guest GOP Whip Eric Cantor

Suggested contribution is 1k per PAC or \$500 individual, but ANY help you have left for John before the end of the year is much appreciated.

Do you think you can help John out before the end of the year ?

Thanks so much,

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
Washington, DC 20005
202.302. [REDACTED]

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From: Jonathan Graham [REDACTED]@gulagraham.com]
Sent: Tuesday, December 08, 2009 2:12 PM
To: Kate Abel
Subject: Campbell Events Tomorrow w/ NUNES & CANTOR

Kate - I know we've probably asked a couple of times already, but I wanted to circle back one last time and see if either of these events for John Campbell tomorrow might work for you. ANY level of support (1k or \$500) would be much appreciated as he tries to finish the year off strong.

Lunch (noon) at CHC w/ Special Guest Devin Nunes

CA Wine Tasting Rec (5:00 p.m.) at 123 D St SE (right around the corner from CHC) w/ Special Guest Eric Cantor

Any chance you can join John for either of these events tomorrow ?

Thank so much,

Jon

Jon Graham

The Gula Graham Group

700 12th St NW, Suite 700

Washington, DC 20005

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From: Jon Graham
To: Wilsusen, Joshua (GOVTREL)
Sent: 12/2/2009 2:37:13 PM
Subject: 2 Great Events for John Campbell

Josh - I wanted to get 2 great opportunities over to you to help John Campbell before the end of the year, BOTH are on December 8th.

Lunch (Noon) at the Capitol Hill Club w/ Special Guest Congressman Devin Nunes
please note this event was originally scheduled for Dec 8th, it is NOW the 9th

CA Wine Tasting Reception (5:00 p.m.) at 123 D Street SE w/ Special Guest GOP Whip Eric Cantor

Suggested contribution is 1k per PAC or \$500 individual, but ANY help you have left for John before the end of the year is much appreciated.

Do you think you can help John out before the end of the year ?

Thanks so much,

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
Washington, DC 20005
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From: Jonathan Graham
To: [REDACTED]@morganstanley.com
Sent: 12/8/2009 2:11:38 PM
Subject: Campbell Events Tomorrow w/ NUNES & CANTOR

Josh – I know we've probably asked a couple of times already, but I wanted to circle back one last time and see if either of these events for John Campbell tomorrow might work for you.. ANY level of support (1k or \$500) would be much appreciated as he tries to finish the year off strong.

Lunch (noon) at CHC w/ Special Guest Devin Nunes

CA Wine Tasting Rec (5:00 p.m.) at 123 D St SE (right around the corner from CHC) w/ Special Guest Eric Cantor

Any chance you can join John for either of these events tomorrow ?

Thank so much,

Jon

Jonathan Graham
1110 California Street, Suite 1000
San Francisco, CA 94109
Tel: 415.774.1000
Fax: 415.774.1001
www.gulagraham.com

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From: Jon Graham
To: Mark Fernald
Sent: 12/2/2009 2:38:15 PM
Subject: 2 Great Events for John Campbell

Mark - I wanted to get 2 great opportunities over to you to help **John Campbell** before the end of the year, **BOTH** are on **December 9th**.

Lunch (Noon) at the Capitol Hill Club w/ Special Guest Congressman Devin Nunes

please note this event was originally scheduled for Dec 8th, it is NOW the 9th

CA Wine Tasting Reception (5:00 p.m.) at 123 D Street SE w/ Special Guest GOP Whip Eric Cantor

Suggested contribution is 1k per PAC or \$500 individual, but ANY help you have left for John before the end of the year is much appreciated.

Do you think you can help John out before the end of the year ?

Thanks so much,

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
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2 Great Events for John Campbell
Jon Graham to: Marylu Korkuch
Please respond to <[REDACTED]@gulagraham.com>

12/02/2009 01:35 PM
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Marylu - I wanted to get 2 great opportunities over to you to help **John Campbell** before the end of the year. **BOTH** are on **December 9th**.

Lunch (Noon) at the Capitol Hill Club w/ Special Guest Congressman Devin Nunes
please note this event was originally scheduled for Dec 8th, it is NOW the 9th

CA Wine Tasting Reception (5:00 p.m.) at 123 D Street SE w/ Special Guest GOP Whip Eric Cantor

Suggested contribution is 1k per PAC or \$500 individual, but ANY help you have left for John before the end of the year is much appreciated.

Do you think you can help John out before the end of the year ?

Thanks so much,

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
Washington, DC 20005
202.302.[REDACTED]

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2 Great Events for John Campbell
Jon Graham to: Dan Conway
Please respond to <[REDACTED]@gulagraham.com>

12/02/2009 01:35 PM
[Show Details](#)

Dan - I wanted to get 2 great opportunities over to you to help **John Campbell** before the end of the year. **BOTH** are on **December 9th**.

Lunch (Noon) at the Capitol Hill Club w/ Special Guest Congressman Devin Nunes
please note this event was originally scheduled for Dec 8th, it is NOW the 9th

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Suggested contribution is 1k per PAC or \$500 individual, but ANY help you have left for John before the end of the year is much appreciated.

Do you think you can help John out before the end of the year ?

Thanks so much,

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
Washington, DC 20005
202.302.[REDACTED]

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2 Great Events for John Campbell
Jon Graham to: Simi Narron
Please respond to <[REDACTED]@gulagraham.com>

12/02/2009 01:39 PM
[Show Details](#)

Simi - I wanted to get 2 great opportunities over to you to help **John Campbell** before the end of the year. **BOTH** are on **December 9th**.

Lunch (Noon) at the Capitol Hill Club w/ Special Guest Congressman Devin Nunes
please note this event was originally scheduled for Dec 8th, it is NOW the 9th

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Suggested contribution is 1k per PAC or \$500 individual, but ANY help you have left for John before the end of the year is much appreciated.

Do you think you can help John out before the end of the year ?

Thanks so much,

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
Washington, DC 20005
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10-4283_0064

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12/8 Rep. Campbell Luncheon w/ Rep. Nunes
Katy Cannon to: [REDACTED]@chubb.com

11/13/2009 09:58 AM

[Show Details](#)

Hi Dan-

I want to make sure you have this great event for Congressman John Campbell on your radar screen. On December 8th at noon at the Capitol Hill Club Congressman Devin Nunes will be joining us as the special guest for a luncheon honoring Congressman John Campbell.

The suggested contribution is:

Attend: \$1,000 per PAC or \$500 per Individual

Co-Host: \$2,000 per PAC or \$1,000 per Individual

Please let me know if you can join us or would like information on any of the Congressman's upcoming events.

Best,

Katy

From: Jon Graham <[REDACTED]@gulagraham.com>
Sent: Wednesday, December 2, 2009 7:36 PM (GMT)
To: Cunniffe, Amy (GE Healthcare) <[REDACTED]@ge.com>
Subject: 2 Great Events for John Campbell

Amy - I wanted to get 2 great opportunities over to you to help **John Campbell** before the end of the year, **BOTH** are on **December 9th**.

Lunch (Noon) at the Capitol Hill Club w/ Special Guest Congressman Devin Nunes
please note this event was originally scheduled for Dec 8th, it is NOW the 9th

CA Wine Tasting Reception (5:00 p.m.) at 123 D Street SE w/ Special Guest GOP Whip Eric Cantor

Suggested contribution is 1k per PAC or \$500 individual, but ANY help you have left for John before the end of the year is much appreciated.

Do you think you can help John out before the end of the year ?

Thanks so much,

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
Washington, DC 20005
202.302.[REDACTED]

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"Jon Graham"
[redacted]@gulagraham.com>

12/02/2009 02:35 PM

Please respond to
[redacted]@gulagraham.com>

To "Julie Herwig" <[redacted]@nyl.com>

cc

bcc

Subject: 2 Great Events for John Campbell

Julie - I wanted to get 2 great opportunities over to you to help **John Campbell** before the end of the year, **BOTH** are on **December 9th**.

Lunch (Noon) at the Capitol Hill Club w/ Special Guest Congressman Devin Nunes
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Suggested contribution is 1k per PAC or \$500 individual, but ANY help you have left for John before the end of the year is much appreciated.

Do you think you can help John out before the end of the year ?

Thanks so much,

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
Washington, DC 20005
202.302.[redacted]

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"Jon Graham"
[redacted]@gulagraham.com>

12/02/2009 02:35 PM

Please respond to
[redacted]@gulagraham.com>

To "Jon Paone" <[redacted]@newyorklife.com>

cc

bcc

Subject: 2 Great Events for John Campbell

Jon - I wanted to get 2 great opportunities over to you to help **John Campbell** before the end of the year. **BOTH** are on **December 9th**.

Lunch (Noon) at the Capitol Hill Club w/ Special Guest Congressman Devin Nunes
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Do you think you can help John out before the end of the year ?

Thanks so much,

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
Washington, DC 20005
202.302.[redacted]

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Kaswell, Noah

From: Marine, Noah
Sent: Monday, June 21, 2010 9:50 AM
To: OCE RFI
Subject: FW: Campbell Dinner?
Attachments: Jonathan Graham .vcf; 10-21-09 John Campbell Dinner.doc

From: Marine, Noah
Sent: Thursday, October 08, 2009 2:29 PM
To: DeFife, Scott
Subject: FW: Campbell Dinner?

FYI - Should we do this industry wide event?

From: Jonathan Graham [redacted@gulagraham.com]
Sent: Thursday, October 08, 2009 2:19 PM
To: Marine, Noah
Subject: Campbell Dinner?

Noah – we got a pretty good group together for a John Campbell dinner on 10/21...any chance you can help?

Current RSVPs:

Steve	Patterson	JPMorgan
John	Anderson	Credit Suisse
Maura	Solomon	Citi
Ed	Hill	Bank of America
Amy	Best Coughlin	PricewaterhouseCoopers
Jennifer	Platt	ICSC

It's looking like he may have a race on his hands, early opponent who is raising some dough and President Obama won his district in 08.

Invite is attached, we'd love to have you join us.

Hope you are well,

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
Washington, DC 20005
202.302. [redacted]
www.gulagraham.com

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6/22/2010

SIFMA-OCE-000370

10-4283_0075

Jones, Alicia K

From: Jones, Alicia K
Sent: Tuesday, December 08, 2009 2:22 PM
To: 'Mike Gula'
Subject: RE: On the house tomorrow

Tomorrow will be tough, but I will try to stop by for a few minutes. I appreciate the invite and hope that I can make it.

Alicia Kerry

Alicia Kerry Jones
Associate Director, Congressional Relations
American Optometric Association
1505 Prince Street
Alexandria, VA 22314
703-837-████████

From: Mike Gula [████████@gulagraham.com]
Sent: Tuesday, December 08, 2009 1:36 PM
To: Jones, Alicia K
Subject: On the house tomorrow

Can you swing by my Congressman Campbell & Eric Cantor reception at 123 D St, SE between 5:00-6:15ish?

It is a wine tasting....just wanted to get a couple more bodies there. not looking for \$\$\$. I got that covered. Let me know if this works for you

Thanks

Mike

Michael Gula
C: ██████████
W: 202-558-██████

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From: Jon Graham [redacted]@gulagraham.com]
Sent: Wednesday, December 02, 2009 2:40 PM
To: Anderson, John
Subject: 2 Great Events for John Campbell

John - I wanted to get 2 great opportunities over to you to help **John Campbell** before the end of the year, **BOTH** are on **December 9th**.

Lunch (Noon) at the Capitol Hill Club w/ Special Guest Congressman Devin Nunes
please note this event was originally scheduled for Dec 8th, it is NOW the 9th

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Suggested contribution is 1k per PAC or \$500 individual, but ANY help you have left for John before the end of the year is much appreciated.

Do you think you can help John out before the end of the year ?

Thanks so much,

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
Washington, DC 20005
202.302.9930

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Financial Institutions & Consumer Credit

House Committee on the Budget

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From: Jon Graham [REDACTED]@gulagraham.com]
Sent: Wednesday, December 02, 2009 2:36 PM
To: Moran, Michael
Subject: 2 Great Events for John Campbell

Mike - I wanted to get 2 great opportunities over to you to help **John Campbell** before the end of the year, **BOTH** are on **December 9th**.

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Do you think you can help John out before the end of the year ?

Thanks so much,

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
Washington, DC 20005
202.302. [REDACTED]

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From: Jon Graham [REDACTED]@gulagraham.com]
Sent: Wednesday, December 02, 2009 2:35 PM
To: Whalen, Mary
Subject: 2 Great Events for John Campbell

Mary Lynne - I wanted to get 2 great opportunities over to you to help **John Campbell** before the end of the year, **BOTH** are on **December 9th**.

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Do you think you can help John out before the end of the year ?

Thanks so much,

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
Washington, DC 20005
202.302. [REDACTED]

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From: Anderson, John <[REDACTED]@credit-suisse.com>
Sent: Monday, October 5, 2009 1:49 PM (GMT)
To: Hill, Edward J <[REDACTED]@bankofamerica.com>; [REDACTED]@us.pwc.com; Steven R
Patterson <[REDACTED]@jpmchase.com>
Cc: Moran, Michael <[REDACTED]@credit-suisse.com>
Subject: Campbell Invite
Attach: 10-21-09 John Campbell Dinner.doc

please find attached the invite for the John Campbell dinner on the 21st. No names. Please let me know if you have any changes by COB otherwise we'll finalize and circulate. thanks

Please note the attached hyperlinks are for internal electronic communications (disclosure
of information may be subject to the applicable laws, rules, and regulations)

You are cordially invited to a

Financial Services Dinner

Honoring

Congressman John Campbell

(CA-48)

*House Committee on Financial Services
House Committee on the Budget*

Wednesday, October 21st
6:00 p.m.

Finemondo
1319 F Street NW

Suggested Contribution:

Host: \$2,000 per PAC/\$1,000 per Individual

Attend: \$1,000 per PAC/\$500 per Individual

Please RSVP to:
Jon Graham or Mike Gula
at 202-302-██████ or mail
██████@gulagraham.com

Please make checks payable to:
Campbell for Congress
700 12th Street NW – Suite 700
Washington, DC 20005

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From: Jon Graham [mailto:jon@gulagraham.com]
Sent: Wednesday, December 02, 2009 7:39 PM
To: Rubin, Mark S
Subject: 2 Great Events for John Campbell

Mark - I wanted to get 2 great opportunities over to you to help **John Campbell** before the end of the year. **BOTH** are on **December 9th**.

Lunch (Noon) at the Capitol Hill Club w/ Special Guest Congressman Devin Nunes
please note this event was originally scheduled for Dec 8th, it is NOW the 9th

CA Wine Tasting Reception (5:00 p.m.) at 123 D Street SE w/ Special Guest GOP Whip Eric Cantor

Suggested contribution is 1k per PAC or \$500 individual, but ANY help you have left for John before the end of the year is much appreciated.

Do you think you can help John out before the end of the year ?

Thanks so much,

Jon

Jon Graham
The Gula Graham Group
700 12th St NW, Suite 700
Washington, DC 20005
202.302.1234

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From: Hart, Jim
Sent: Friday, October 16, 2009 11:21 AM
To: Mekonen, Abiyan
Subject: RE:

Looks like he has three events, at least between the 21st and the 31st...that is a lot.

We made a commitment to do the Oct. 30th lunch with Paul Ryan as guest.

Good luck on the 21st....

From: Mekonen, Abiyan [REDACTED]@credit-suisse.com]
Sent: Friday, October 16, 2009 12:09 PM
To: Hart, Jim
Subject: RE:

Sorry, the Financial Services dinner for Congressman John Campbell on Oct 21st at 6:00 PM

From: Hart, Jim [REDACTED]@ici.org]
Sent: Friday, October 16, 2009 12:06 PM
To: Mekonen, Abiyan
Subject: RE:

I have to be honest...what event are you referring to...

From: Mekonen, Abiyan [REDACTED]@credit-suisse.com]
Sent: Friday, October 16, 2009 12:05 PM
To: Hart, Jim
Subject:

Hey Jim Hart,

I'm following up on the invite I sent you last week. Will you be able to join us for the special event?

Thanks

Abiyan

Please refer to the attached hyperlink for our privacy and confidentiality communication and disclaimer:
http://www.credit-suisse.com/legal/en/disclosure_email_it.html

Please refer to the attached hyperlink for an important electronic communications disclaimer:
http://www.credit-suisse.com/legal/en/disclosure_email_it.html

EXHIBIT 12

From: Katy Cannon
To: Wilsusen, Joshua (GOVTREL)
Sent: 12/3/2009 1:39:47 PM
Subject: Rep. Campbell 1-1 Meet and Greet?

Hi Josh- I thought you might be interested in a one on one meet and greet coffee with Congressman John Campbell. Have you gotten a chance to talk with him yet? He is a great member on Financial Services and really enjoys getting to sit down and get to know people. Please let me know if you are interested and I am happy to set something up. Below are a few times he is available.

Dec. 8 10:00, 10:30, 11:00, 11:30, 1:00, 1:30, 2:00, 2:30

Dec. 9 10:00, 10:30, 11:00, 11:30, 1:00, 1:30, 2:00, 2:30

Dec. 15 10:00, 10:30, 11:00, 11:30, 1:00, 1:30, 2:00, 2:30

Dec. 16 10:00, 10:30, 11:00, 11:30, 3:00, 3:30, 4:00, 4:30

Dec. 17 10:00, 10:30, 11:00, 11:30, 1:00, 1:30, 2:00, 2:30

Thanks!

Best,

Katy

Katy Cannon

202.577. [REDACTED]

<<http://www.gulagraham.com>> www.gulagraham.com

From: Wilsusen, Joshua (GOVTREL)
To: [REDACTED]@gmail.com
Sent: 11/18/2009 10:41:34 AM
Subject: FW: Rep. John Campbell 1-1 coffee or lunch? Any interest?

From: Katy Cannon [REDACTED]@GULAGRAHAM.COM
Sent: Wednesday, November 18, 2009 10:41:17 AM
To: Wilsusen, Joshua (GOVTREL)
Subject: Rep. John Campbell 1-1 coffee or lunch? Any interest?
Auto forwarded by a Rule

Hi Josh-

I wanted to see if there is any way Morgan Stanley can help out Congressman John Campbell before the end of the quarter. We really appreciate your generous support last cycle. It was a big help. Congressman Campbell wanted me to see if you are available to do a 1-1 coffee or lunch with him. He prefers these to big events. Is there any way you can do \$1K or even \$500 to help him out? He has a councilwoman running against him and Obama carried his district last cycle. Thanks so much. Let me know if you are free any of the following times and I am happy to set something up.

Wed. 12/2 -After 10am

Thurs. 12/3 -10am-2pm

Tues.12/8 -After 10am

Wed. 12/9 -After 10am

Thurs. 12/10 -10am-2pm

Tues. 12/15 - After 10am

Wed. 12/16 - 10am-1pm, After 3pm

Thurs. 12/16 - After 10am

Thanks!

Best,

Katy

CAMPBELL 4

Aquiles Suarez

From: Aquiles Suarez
Sent: Wednesday, November 18, 2009 10:49 AM
To: 'Katy Cannon'
Subject: RE: Rep. John Campbell 1-1 coffee or lunch? Any interest?

Katy --

I've already RSVP'd (I think to Gena) for tomorrow's lunch for John Campbell with Paul Ryan -- I'm in for \$1,000.

AFS

From: Katy Cannon [redacted@gulagraham.com]
Sent: Wednesday, November 18, 2009 10:41 AM
To: Aquiles Suarez
Subject: Rep. John Campbell 1-1 coffee or lunch? Any interest?

Hi Aquiles-

I wanted to see if there is any way National Assn of Industrial and Office Properties (NAIOP) can help out Congressman John Campbell before the end of the quarter. We really appreciate your generous support last cycle. It was a big help. Congressman Campbell wanted me to see if you are available to do a 1-1 coffee or lunch with him. He prefers these to big events. Is there any way you can do \$1K or even \$500 to help him out? He has a councilwoman running against him and Obama carried his district last cycle. Thanks so much. Let me know if you are free any of the following times and I am happy to set something up.

Wed. 12/2 -After 10am
 Thurs. 12/3 -10am-2pm

Tues.12/8 -After 10am
 Wed. 12/9 -After 10am
 Thurs. 12/10 -10am-2pm

Tues. 12/15 - After 10am
 Wed. 12/16 - 10am-1pm, After 3pm
 Thurs. 12/16 - After 10am

Thanks!

Best,
 Katy

From: Mike Gula <[REDACTED]@gulagraham.com>
Sent: Thursday, November 5, 2009 3:15 PM (GMT)
To: Hill, Edward J <[REDACTED]@bankofamerica.com>
Subject: Campbell/Paul Ryan lunch or 1-1
Attach: 11-19-09 John Campbell Lunch with Paul Ryan NEW DATE.doc

Hey Ed - I got a great lunch for you with 2 good Members in Nov 19th... Congressman Paul Ryan is the special guest for a Congressman John Campbell lunch on Nov 19th at 446 New Jersey Ave. SE. This townhouse is right around the corner from the Capitol Hill Club. I know it is late in the year. I wanted to see if you could help Campbell at the \$500 or \$1K level??? this will be a good lunch with 2 good Members. Let me know if this works for your schedule. thanks so much for any help

OR would you like a 1-1 instead? I can send over some times. You very supportive of Campbell last cycle. ANY help before the end of the year will really help. Thanks so much

Mike

Michael Gula

C: [REDACTED]
W: 202-558-[REDACTED]

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John Campbell/Paul Ryan Lunch 10/30
Gena Villari to: [REDACTED]@chubb.com

10/21/2009 09:55 AM

[Show Details](#)

Dan,

Good morning! Just wanted to get a lunch on your radar screen for Congressman John Campbell. He'll be having a lunch with special guest, Congressman Paul Ryan on Friday, October 30 at 12:00 PM at the Capitol Hill Club. Please let me know if you are able to join us.

As always, if you would like to support Congressman Campbell, but are unable to attend the lunch, please let me know and I'll be glad to arrange a 1-1 coffee for you. Thanks so much.

Gena

Gena Villari
202.306.[REDACTED]
www.gulagraham.com

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You are cordially invited to a

Luncheon

Honoring

Congressman John Campbell

(CA-48)

House Committee on Financial Services

Subcommittee on Capital Markets, Insurance & Government Sponsored

Enterprises

Subcommittee on Financial Institutions & Consumer Credit

House Committee on the Budget

With Special Guest

CHUBB_OCE_008012
10-4283_0093

Congressman Paul Ryan

Friday, October 30th

Noon

LOCATION

TBD

Suggested Contribution:

Attend: \$1,000 per PAC or \$500 per Individual
Co-Host: \$2,000 per PAC or \$1,000 per Individual

Please RSVP to:
Jon Graham or Mike Gula

at 202-302-██████ or e-mail

██████@gulagraham.com

Please make checks payable to:
Campbell for Congress
700 12th Street NW – Suite 700
Washington, DC 20005

Paid for by Campbell for Congress

Contributions are not tax deductible as a charitable donation for federal income tax purposes. By law, the maximum amount an individual may contribute is \$2,400 per election. Federal multi-candidate PACs may contribute \$5,000 per election. Federal Election Law requires political committees to report the name, mailing address, occupation and name of employer for contributions where aggregate is in excess of \$200 in a calendar year. Contributions from corporations, foreign nationals, labor unions and federal government contractors are prohibited. Partnership checks are welcome, but please provide a written statement as to who to attribute contributions to.

From: Gena Villari <[REDACTED]@gulagraham.com>
Sent: Monday, October 5, 2009 2:24 PM (GMT)
To: <[REDACTED]@mastercard.com>
Subject: 1-1 Coffee with Bachmann and/or Campbell?

Tucker- I wanted to see if you'd be interested in grabbing a cup of coffee with one or two great Financial Services Members, Michele Bachmann and John Campbell. This is not a fundraiser, but rather just a 1-1 relationship-building meeting at the Capitol Hill Club. I have included times that both Members are available for coffee below. Please let me know if you would like to set up a time to meet with either Rep. Bachmann or Rep. Campbell (or both, separately).

Bachmann

Oct 7 11:30

Oct. 8 10:30, 11:00, 11:30

Oct. 15 10:00

Oct. 21 10:00, 10:30, 11:00, 11:30

Oct. 22 10:00, 10:30, 11:00, 11:30

Campbell

Oct 7 10, 10:30, 11:00, 11:30, 3:00, 3:30

Oct 8 10, 10:30, 11:00, 11:30, 3:00, 3:30

Oct 9 10, 10:30, 11:00, 11:30

Oct 14 10:30, 11:30, 1:00, 1:30, 2:00, 2:30, 3:00, 3:30, 4:00

Oct 21 8:00, 8:30, 9:00, 9:30, 10:00, 10:30, 11:00, 11:30, 3:00, 3:30

Oct 22:8:00, 8:30, 9:00, 9:30, 10:00, 10:30, 11:00, 11:30

Thanks.

Gena

Gena Villari

The Gula Graham Group

700 12th St NW, Ste 700

Washington DC, 20005

202.306.████

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"Gena Villari"
 [REDACTED]@gulagraham.com>
 10/05/2009 10:34 AM

To <[REDACTED]@nyl.com>
 cc
 bcc

Subject 1-1 Coffee with Bachmann and/or Campbell?

Julie- I wanted to see if you'd be interested in grabbing a cup of coffee with one or two great Financial Services Members, Michele Bachmann and John Campbell. This is not a fundraiser, but rather just a 1-1 relationship-building meeting at the Capitol Hill Club. I have included times that both Members are available for coffee below. Please let me know if you would like to set up a time to meet with either Rep. Bachmann or Rep. Campbell (or both, separately).

Bachmann

Oct 7 11:30
 Oct. 8 10:30, 11:00, 11:30
 Oct. 15 10:00
 Oct. 21 10:00, 10:30, 11:00, 11:30
 Oct. 22 10:00, 10:30, 11:00, 11:30

Campbell

Oct 7 10, 10:30, 11:00, 11:30, 3:00, 3:30
 Oct 8 10, 10:30, 11:00, 11:30, 3:00, 3:30
 Oct 9 10, 10:30, 11:00, 11:30
 Oct 14 10:30, 11:30, 1:00, 1:30, 2:00, 2:30, 3:00, 3:30, 4:00
 Oct 21: 8:00, 8:30, 9:00, 9:30, 10:00, 10:30, 11:00, 11:30, 3:00, 3:30
 Oct 22: 8:00, 8:30, 9:00, 9:30, 10:00, 10:30, 11:00, 11:30

Thanks,
 Gena

Gena Villari
 The Gula Graham Group
 700 12th St NW, Ste 700
 Washington DC, 20005
 202.306 [REDACTED]

This email should be treated as a confidential communication of The Gula Graham Group. It may include information that is privileged and/or confidential under both State and Federal Law. If you are not the intended recipient, you are notified that any retention and/or further use, distribution, printing or disclosure of this communication is prohibited.

EXHIBIT 13

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 Campbell's Chief of Staff
Review #: 10-4283
Date: July 20, 2010
Location: Rayburn HOB
Time: 2:50 p.m. – 3:30 p.m. (approximate)
Participants: Omar Ashmawy
Paul Solis
Michael Toner
Brandis Zehr

Summary: The witness is the Chief of Staff for Representative John Campbell who represents the 48th District of California. The OCE requested an interview with the witness and she consented to an interview. She made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and signed the written acknowledgement of the warning, which will be placed in the case file in this review. The witness consented to an interview on July 20, 2010.
2. The witness told the OCE that as a Chief of Staff her primary function was to oversee both the Washington, DC and district office. She is responsible for personnel issues such as hiring and firing and also for the office budget and its expenditures. She has been the Chief of Staff for almost two years.
3. Regarding policy issues, the witness sits in on almost every meeting the Congressman has in the office. The appropriate Legislative Assistant will also be in the meeting. The witness described her role as "having a handle on everything" but not micro-managing the staff. Legislative issues do not have to go through the witness before going to the Congressman. The witness did not do any work on the financial reform legislation.
4. Regarding fundraising, the witness stated that the office has a professional fundraiser that does all the DC fundraising. The office also has a district person who does local events in California. Mr. Mike Gula the office's Washington, DC fundraiser. The witness hired Mr. Gula. Similar to her role regarding the legislative issues, the witness is aware of what Mr. Gula is doing, but lets him handle the fundraising.
5. Mr. Gula sends the list of anticipated attendees to the witness and the office scheduler either the day of the event or the day before. The witness will then give it to the Congressman. The list of attendees will also go on the Congressman's office calendar.

CONFIDENTIAL

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

6. The witness attends 90-95% of the Congressman's Washington, DC fundraisers. The only other staff who attends is the financial services Legislative Assistant, Mr. McCelland and the Legislative Director, David Malech.
7. No one in the office asks staff members to attend fundraisers. Mr. Malech or Mr. McCelland will sometimes ask to attend because they know a lobbyist on the attendee list or having a friend who is attending.
8. The witness was shown a flyer for a December 9, 2009 fundraiser.
9. The witness attended the fundraiser. Mr. McCelland also attended. The witness role was that she "chatted" with the people at the event before the Congressman arrived. She did not remember any specific attendees and stated that there was no focus to the fundraiser as far as she remembered.
10. The fundraiser was planned probably 1 ½ - 2 months in advance.
11. Generally, Mr. Gula plans fundraiser by requesting available dates and times from the Congressman approximately 2 months in advance. Once he receives the dates, he then puts together a calendar of events and emails the calendar to the witness and the scheduler. The witness is not aware of what Mr. Gula does in the interim and does not know who will attend a particular event until she receives the attendee list on the day of the fundraiser or the day before the event.
12. The Member does not make fundraising or follow up calls inviting people to the event. Neither does the witness. Mr. Gula "does everything."
13. The witness was shown a flyer for an evening fundraiser on December 9, 2009 and a corresponding list.
14. The witness attended the fundraiser. She recalled that Mr. McCelland arrived at some point. The witness "chatted with people" but did not recall who she spoke with. There was no industry focus to the event. The event was probably planned around the same time as the other December 9th event.
15. The witness stated that Congress is usually in session in early December. It would not have been unusual to be in session on December 9, 2009. Congress is almost always in session until the 12th or 15th of December – especially in a non-election year.
16. The witness was shown a flyer for an October 21 fundraiser and a list of attendees.
17. The witness and Mr. McCelland were at the fundraiser. There was not an industry focus to the event as far as she could remember.
18. The witness never sees invitations to the fundraisers Mr. Gula plans. Today was the first time she has ever seen them.

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

19. Mr. Gula does not tell the witness if a particular event will focus on a specific industry. However, most of the people the office interacts with are related to the financial services industry.

I prepared this Memorandum of Interview on July 20, 2010 after interviewing the witness on July 20, 2010 based on the notes staff prepared during the interview. I certify that this memorandum contains all pertinent matter discussed with the witness on July 20, 2010.

Omar Ashmawy
Investigative Counsel

EXHIBIT 14

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 Campbell's Legislative Assistant
Review #: 10-4283
Date: July 20, 2010
Location: Rayburn HOB
Time: 2:10 p.m. – 2:45 p.m. (approximate)
Participants: Omar Ashmawy
Paul Solis
Michael Toner
Brandis Zehr

Summary: The witness is a Legislative Assistant for Representative John Campbell who represents the 48th District of California. The OCE requested an interview with the witness and he consented to an interview. He made the following statements in response to our questioning:

1. The witness was given an 18 U.S.C. § 1001 warning and signed the written acknowledgement of the warning, which will be placed in the case file in this review. The witness consented to an interview on July 20, 2010.
2. The witness told the OCE that as a Legislative Assistant ("LA") he was responsible for issues relating to financial services, energy, transportation and several "ad hoc scientific issues."
3. The office has both a Legislative Director ("LD") and a Chief of Staff. They are both his supervisors, but on many financial services issues the witness has direct access to the Member. If there is time, he may run an issue by the LD or Chief of Staff but not always. There is no rule that requires the witness to consult with the LD or Chief of Staff before going to the Congressman.
4. The witness has attended fundraisers. When he attends them, he has not particular role or responsibilities. He attends fundraiser in part because of personal career reasons and to interact with people he knows.
5. The witness has never been told to go to a fundraiser and has never been invited to one. When he sees a fundraiser that he wants to attend he will ask if he can go. He knows when the fundraisers are held because they are on the Member's calendar, to which he has access. The names of the expected attendees are also on the calendar. If he sees names that he recognizes he will go to the fundraiser.

CONFIDENTIAL

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

6. The only other staff he sees at fundraisers is the Chief of Staff, who attends “quite a few,” and the LD, who sometimes attends. The witness attends approximately 75% of the fundraisers in Washington DC.
7. The witness was shown a flyer for a December 9, 2009 fundraiser and a list of names
8. The witness did not remember if the fundraiser he attended was on December 9, 2009, but he did recall attending a lunch fundraiser with Congressman Nunes. He thinks other staff members attended but could not remember who. If another staff member attended it would have either been the Chief of Staff or the LD.
9. When asked about the attendees of the December 9, 2009 lunch-time fundraiser, initially the witness could not remember anyone specifically. However, he then remembered several individuals. He recalled “exchanging pleasantries” with Tim Randsdell, a lobbyist for Sempra Energy and speaking with Michelle Holiday. Ms. Holiday mentioned that there was an energy bill her company had that she wanted the witness to take a look at. The witness told her to call him later. The witness also remembered saying hello to Tom Townsend.
10. There was no industry focus at the December 9th event. The witness could not recall when he learned about the fundraiser.
11. The witness was shown a flyer and list from an evening fundraiser also on December 9, 2010.
12. The witness also attended this event. He arrived late and only stayed for approximately 20 minutes. The witness recalled saying hello to several people and remembered speaking to a representative of the American Bankers Association. They spoke about what each person was going to do when the regulatory reform legislation was complete. The Chief of Staff also attended the event. The event did not have an industry focus.
13. The witness has no part in planning fundraisers. He has exchanged a handful of emails with Mr. Mike Gula, the Congressman’s fundraiser, but did not remember what they were about.
14. The witness was shown a flyer and list from an October 21, 2009 fundraiser.
15. The witness recalled the fundraiser. He attended the fundraiser for personal reasons and to get dinner. He recalled sitting at a table outside the room. There were a lot of “financial services people” there, but he did not remember anyone asking to talk about a specific financial services issue. Most of the attendees were related to financial services.
16. The witness explained that the mark-up on regulatory reform began after Labor Day and that the House of Representatives ended up combining 5 or 7 bills. He could not identify any significant dates related to the legislation in October, November, or December. The witness described the period of time from September through December as “one big mash up.”

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

17. The witness knew Brendan Reilly. He has known him for several years. Mr. Reilly works for the Commercial Mortgage and Securities Association. The witness worked with Mr. Reilly on an amendment.
18. The witness knew John Anderson. He has known Mr. Anderson for several years. Mr. Anderson has held several jobs, but was most recently at Credit Suisse. The witness and Mr. Anderson worked on “some study language” regarding bankruptcy and cross-margining.
19. The witness also worked with Scott McLucas from KPMG. The witness could not remember what they worked on together, but he did work on regulatory reform with him in 2009.
20. The witness was asked about an amendment offered by Representative Watt regarding automotive dealers. The witness stated that Representative Campbell and Representative Watt tried to reach a compromise, but ultimately could not. The amendment was withdrawn because it did not have the votes to pass.

I prepared this Memorandum of Interview on July 20, 2010 after interviewing the witness on July 20, 2010 based on the notes staff prepared during the interview. I certify that this memorandum contains all pertinent matter discussed with the witness on July 20, 2010.

Omar Ashmawy
Investigative Counsel

