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Clear Form

## Employee Post-Travel Disclosure of Travel Expenses

**Post-Travel Filing Instructions:** Complete this form within **30 days** of returning from travel. Submit all forms to the **Office of Public Records in 232 Hart Building**.

In compliance with Rule 35.2(a) and (c), I make the following disclosures with respect to travel expenses that have been or will be reimbursed/paid for me. I also certify that I have attached:

☐ The **original** *Employee Pre-Travel Authorization* (Form RE-1), **AND**

☒ A **copy** of the *Private Sponsor Travel Certification Form* with all attachments (itinerary, invitee list, etc.)

Private Sponsor(s) (list all): Hoover Institution, Stanford University

Travel date(s): August 23-26, 2022

Name of accompanying family member (if any): ---

Relationship to Traveler: ☐ Spouse ☐ Child

IF THE COST OF LODGING **DID NOT INCREASE** DUE TO THE ACCOMPANYING SPOUSE OR DEPENDENT CHILD, ONLY INCLUDE LODGING COSTS IN EMPLOYEE EXPENSES. (Attach additional pages if necessary.)

**Expenses for Employee:**

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses (Amount & Description)
<input type="checkbox"/> Good Faith Estimate	\$725.48 total - \$626.06 airfare \$99.42 ground transportation	\$824.64 total - \$735 lodging \$89.64 tax	\$139 total	
<input checked="" type="checkbox"/> Actual Amount				

**Expenses for Accompanying Spouse or Dependent Child** (if applicable):

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses (Amount & Description)
<input type="checkbox"/> Good Faith Estimate				
<input type="checkbox"/> Actual Amount				

Provide a description of all meetings and events attended. See Senate Rule 35.2(c)(6). (Attach additional pages if necessary.): See attached agenda

9/14/2022  
(Date)

BRIAN HUGHES  
(Printed name of traveler)

Brian Hughes  
(Signature of traveler)

TO BE COMPLETED BY SUPERVISING MEMBER/OFFICER:

I have made a determination that the expenses set out above in connections with travel described in the *Employee Pre-Travel Authorization* form, are necessary transportation, lodging, and related expenses as defined in Rule 35.

9/14/2022  
(Date)

[Signature]  
(Signature of Supervising Senator/Officer)

**EMPLOYEE PRE-TRAVEL AUTHORIZATION**

Date/Time Stamp:

**Pre-Travel Filing Instructions:** Complete and submit this form at least 30 days prior to the travel departure date to the **Select Committee on Ethics in SH-220**. Incomplete and late travel submissions will **not** be considered or approved. This form **must** be typed and is available as a fillable PDF on the Committee's website at [ethics.senate.gov](http://ethics.senate.gov). Retain a copy of your entire pre-travel submission for your required post-travel disclosure.

Name of Traveler: Brian Hughes

Employing Office/Committee: Office of U.S. Senator Lisa Murkowski

Private Sponsor(s) (list all): Stanford University - Hoover Institution

Travel date(s): August 23-August 26, 2022

*Note: If you plan to extend the trip for any reason you **must** notify the Committee.*

Destination(s): San Francisco/Palo Alto, California — Stanford University Campus

Explain how this trip is specifically connected to the traveler's official or representational duties:

Stanford University's Hoover Institution is a preeminent conservative think tank, with dozens of highly-regarded scholars and thought leaders who generate policy ideas to help resolve domestic and international challenges. Exposure to their ideas and thinking is a form of continuing education that is directly relevant and beneficial to my duties as a writer and policy advisor, where I encounter many of the same issues. The knowledge and connections that I hope to gain through this policy fellowship will enable me to do a better, more informed job for my Senator and the people she serves—at no expense to taxpayers.

Name of accompanying family member (if any): N/A

Relationship to Employee: ☐ Spouse ☐ Child

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

7/19/2022  
(Date)

Brian Hughes  
(Signature of Employee)

TO BE COMPLETED BY SUPERVISING SENATOR/OFFICER (President of the Senate, Secretary of the Senate, Sergeant at Arms, Secretary for the Majority, Secretary for the Minority, and Chaplain):

**Senator Lisa Murkowski**

**Brian Hughes**

I, Senator Lisa Murkowski hereby authorize Brian Hughes  
(Print Senator's/Officer's Name) (Print Traveler's Name)

an employee under my direct supervision, to accept payment or reimbursement for necessary transportation, lodging, and related expenses for travel to the event described above. I have determined that this travel is in connection with his or her duties as a Senate employee or an officeholder, and will not create the appearance that he or she is using public office for private gain.

I have also determined that the attendance of the employee's spouse or child is appropriate to assist in the representation of the Senate. (signify "yes" by checking box) ☐

7/19/2022  
(Date)

Lisa Murkowski  
(Signature of Supervising Senator/Officer)



June 23, 2022

Dear Brian,

We are pleased to inform you that you have been selected to participate in the Hoover Institution's Stuart Family Congressional Fellowship Program from August 24-25, 2022. This program includes seminars on Stanford University's campus, where Hoover scholars, such as former National Security Advisor H.R. McMaster, historian Niall Ferguson, cyber expert Amy Zegart, and economist John Cochrane will lead policy sessions on some of the most pressing issues of today.

These sessions will challenge you to learn from and debate key philosophical and policy issues with some of the nation's leading thinkers and practitioners. As a participant you will receive round-trip airfare, ground transportation in California, lodging near Stanford's campus, and those meals that are part of the program.

For your planning purposes, expect to arrive at SFO on the evening of Tuesday, August 23 and depart either the evening of Thursday, August 25 or the morning of Friday, August 26.

**To proceed, please confirm your agreement to attend by completing [this form](#) by the close of business on Friday, July 1.** By completing this form, you agree to abide by Stanford University COVID-19 health and wellness protocols for visitors which can be found [here](#). Due to ethics rules, to maintain your spot, it is imperative that you complete this form on time. Following completion, you will receive email instructions on how to book your flight. Once your flight is secured, we will provide the remainder of your ethics paperwork for submission **to your ethics committee for review by Monday, July 18.**

If you have any questions, do not hesitate to contact Victoria Guzman ([vmguzman@stanford.edu](mailto:vmguzman@stanford.edu)). We look forward to and expect an excellent program.

Sincerely,

Sarah Delahunty  
Senior Manager, Government Relations  
Hoover Institution, Stanford University

## PRIVATE SPONSOR TRAVEL CERTIFICATION FORM

This form must be completed by any private entity offering to provide travel or reimbursement for travel to Senate Members, officers, or employees (Senate Rule 35, clause 2). Each sponsor of a fact-finding trip must sign the completed form. The trip sponsor(s) must provide a copy of the completed form to each invited Senate traveler, who will then forward it to the Ethics Committee with any other required materials. The trip sponsor(s) should **NOT** submit the form directly to the Ethics Committee. Please consult the accompanying instructions for more detailed definitions and other key information.

The Senate Member, officer, or employee **MUST** also provide a copy of this form, along with the appropriate travel authorization and reimbursement form, to the Office of Public Records (OPR), Room 232 of the Hart Building, within thirty (30) days after the travel is completed.

- 
1. Sponsor(s) of the trip (please list all sponsors): Hoover Institution, Stanford University
  
  2. Description of the trip: An intensive program for Congressional staff which consists of 2 full days of seminars, simulations, and key note presentations at the Hoover Institution, Stanford University.
  
  3. Dates of travel: August 23-26, 2022
  
  4. Place of travel: Stanford University, Stanford, CA
  
  5. Name and title of Senate invitees: See attached list
  
  6. I *certify* that the trip fits one of the following categories:
 

☐ (A) The sponsor(s) are not registered lobbyists or agents of a foreign principal **and** do not retain or employ registered lobbyists or agents of a foreign principal **and** no lobbyist or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.
 

**- OR -**

☒ (B) The sponsor or sponsors are not registered lobbyists or agents of a foreign principal, but retain or employ one or more registered lobbyists or agents of a foreign principal and the trip meets the requirements of Senate Rule 35.2(a)(2)(A)(i) or (ii) (*see question 9*).
  
  7. ☒ I *certify* that the trip will not be financed in any part by a registered lobbyist or agent of a foreign principal.
 

**- AND -**

☒ I *certify* that the sponsor or sponsors will not accept funds or in-kind contributions earmarked directly or indirectly for the purpose of financing this specific trip from a registered lobbyist or agent of a foreign principal or from a private entity that retains or employs one or more registered lobbyists or agents of a foreign principal.
  
  8. I *certify* that:
 

☒ The trip will not in any part be planned, organized, requested, or arranged by a registered lobbyist or agent of a foreign principal except for *de minimis* lobbyist involvement.
 

**- AND -**

☒ The traveler will not be accompanied on the trip by a registered lobbyist or agent of a foreign principal except as provided for by Committee regulations relating to lobbyist accompaniment (*see question 9*).

**9. USE ONLY IF YOU CHECKED QUESTION 6(B)**

I *certify* that if the sponsor or sponsors retain or employ one or more registered lobbyists or agents of a foreign principal, one of the following scenarios applies:

☐ (A) The trip is for attendance or participation in a one-day event (exclusive of travel time and **one** overnight stay) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip.

- OR -

☐ (B) The trip is for attendance or participation in a one-day event (exclusive of travel time and **two** overnight stays) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip (*see questions 6 and 10*).

- OR -

☒ (C) The trip is being sponsored only by an organization or organizations designated under § 501(c)(3) of the Internal Revenue Code of 1986 and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.

**10. USE ONLY IF YOU CHECKED QUESTION 9(B)**

If the trip includes two overnight stays, please explain why the second night is practically required for Senate invitees to participate in the travel:

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11. ☒ An itinerary for the trip is attached to this form. I *certify* that the attached itinerary is a detailed (hour-by-hour), complete, and final itinerary for the trip.

12. Briefly describe the role of each sponsor in organizing and conducting the trip:

Hoover Institution, Stanford University solely planned all aspects of the trip including topics discussed, travel/accommodation logistics, and required paperwork. Hoover Institution staff will also accompany Congressional staff for all ground transportation and manage logistics for the duration of the trip.

13. Briefly describe the stated mission of each sponsor and how the purpose of the trip relates to that mission:

Stanford University is an institution of higher education which seeks to advance knowledge, stimulate creativity and solve real-world problems. As part of the University, The Hoover Institution seeks to improve the human condition... (Continued on separate document, please see attached addendum)

14. Briefly describe each sponsor's prior history of sponsoring congressional trips:

This will be the 10th Stuart Family Congressional Fellowship Program trip for Congressional staff organized by the Hoover Institution, Stanford University. The most recent trip being the April 2022 program which had a similar format & content.

15. Briefly describe the educational activities performed by each sponsor (other than sponsoring congressional trips):

The Hoover Institution, Stanford University regularly sponsors educational policy panels and round

tables for think tank scholars, journalists, Congressional staff, government officials, academics, & the public,

and hosts programs and events based on their research for Stanford students and the public to attend.

16. Total Expenses for Each Participant:

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses
<input checked="" type="checkbox"/> Good Faith estimate  <input type="checkbox"/> Actual Amounts	\$826.06 total  \$626.06 airfare + \$200 - ground transportation between campus, hotel & SFO	\$735 total	\$148 total	\$0

17. State whether a) the trip involves an event that is arranged or organized *without regard* to congressional participation **or** b) the trip involves an event that is arranged or organized *specifically with regard* to congressional participation:

The trip involves an event that is arranged/organized specifically with regard to Congressional

participation.

18. Reason for selecting the location of the event or trip

In order to have a significant number of California-based Hoover Fellows participate in the event, we are

hosting at the Hoover Institution's headquarters on Stanford University's campus.

19. Name and location of hotel or other lodging facility:

The Stanford Park Hotel - 100 El Camino Real, Menlo Park, CA 94025

20. Reason(s) for selecting hotel or other lodging facility:

The hotel was chosen for its proximity to Stanford University's campus and with respect for the per diem requirements.

21. Describe how the daily expenses for lodging, meals, and other expenses provided to trip participants compares to the maximum per diem rates for official Federal Government travel:

Lodging and meal expenses are equal to the per diem rates for official Federal Government travel.

22. Describe the type and class of transportation being provided. Indicate whether coach, business-class or first class transportation will be provided. If first-class fare is being provided, please explain why first-class travel is necessary:

The Hoover Institution Stanford University will provide coach-class, round trip airfare to & from

San Francisco and all ground transportation via Uber... (Continued on separate document, see attached)

23. ☒ I represent that the travel expenses that will be paid for or reimbursed to Senate invitees do not include expenditures for recreational activities, alcohol, or entertainment (other than entertainment provided to all attendees as an integral part of the event, as permissible under Senate Rule 35).

24. List any entertainment that will be provided to, paid for, or reimbursed to Senate invitees and explain why the entertainment is an integral part of the event:

None.

25. I hereby *certify* that the information contained herein is true, complete and correct. (For trips involving more than one sponsor, you *must* include a completed signature page for each additional sponsor):

Signature of Travel Sponsor: Sarah Delahunty

Name and Title: Sarah Delahunty, Senior Manager for Government Relations and Outreach

Name of Organization: Hoover Institution, Stanford University

Address: 1399 New York Avenue, NW Washington, DC

Telephone Number: 202-590-0768

Fax Number: \_\_\_\_\_

E-mail Address: sdel@stanford.edu



THE HOOVER INSTITUTION IN WASHINGTON  
STUART FAMILY CONGRESSIONAL FELLOWSHIP PROGRAM

## AGENDA

All day-time meetings will be held at The Hoover Institution  
Blount Hall - 434 Galvez Mall, Stanford University

### TUESDAY, AUGUST 23

11:35 AM

**Depart ANC via Alaska 1038**

5:15 PM

**Arrive at SFO**

### WEDNESDAY, AUGUST 24

8:30 AM – 9:00 AM

**Breakfast**

*Fairweather Courtyard*

9:00 AM – 10:00 AM

**The United States in World-Historical Perspective**

*Niall Ferguson, the Milbank Family Senior Fellow, will discuss US foreign policy strategy and its effects on US domestic policy.*

10:15 AM – 11:45 AM

**War Games Simulation**

*Jacquelyn Schneider, Hoover Fellow, will conduct a wargaming exercise to demonstrate its role in international relations, how social sciences can guide its design and analysis, and future applications for policy problems.*

11:45 AM – 12:45 PM

**NATO's Response to the Russian Invasion of Ukraine**

*Rose Gottemoeller, Research Fellow, will discuss nuclear security, Russian relations, the NATO alliance, EU cooperation, and nonproliferation.*

1:00 PM – 2:00 PM

**Lunch**

*Fairweather Courtyard*

2:00 PM – 3:00 PM

**Leadership**

*General Jim Mattis, Davies Family Distinguished Fellow, will discuss the role of leadership and the strategic dilemmas that our nation faces.*

3:15 PM – 4:45 PM

**Public Opinion**

*David Brady, the Davies Family Senior Fellow, Emeritus, and Douglas Rivers, Senior Fellow, will*



*discuss their annual polling of the American electorate focusing on themes including governmental power and liberty; social and environmental justice; and populism.*

**4:45 PM – 5:45 PM**

**Flashpoints: The Prospect for Cascading Crises in the Coming Years – Virtual Session**

*General H.R. McMaster, the Fouad and Michelle Ajami Senior Fellow, will discuss the geopolitical challenges to American interests.*

**5:45 PM – 6:15 PM**

**Reception**

*Traitel Pavilion, Traitel Memorial Building  
Attendees will have the opportunity to meet with Hoover fellows to connect on policy and research topics, which were not specifically covered in the set program.*

**6:15 PM – 7:15 PM**

**Dinner**

*Traitel Pavilion, Traitel Memorial Building*

**THURSDAY, AUGUST 25**

**8:30 AM – 9:00 AM**

**Breakfast**

*Fairweather Courtyard*

**9:00 AM – 10:00 AM**

**Spies, Lies, and Algorithms**

*Amy Zegart, the Morris Arnold and Nona Jean Cox Senior Fellow, will discuss the past, present, and future of American espionage as it faces a revolution driven by digital technology, as well as challenges that intelligence communities must confront in the 21st century.*

**10:00 AM – 11:00 AM**

**Senior Citizens and Federal Budget Policy**

*John Cogan, the Leonard and Shirley Ely Senior Fellow will discuss the remarkable growth in senior incomes, the role of federal policy in contributing to this growth, and their implications for federal budget policy.*

**11:15 AM – 12:15 PM**

**Government Policy and Shareholder vs. Stakeholder Capitalism**



*Joshua Rauh, Senior Fellow, will discuss how government policy is amplifying pressure on the private sector to pursue nonfinancial goals, and the possible courses that government policy could take given the rise of ESG investing.*

**12:30 PM – 1:45 PM**

**Working Lunch – Institutional Priorities**

*Blount Hall*

*Denise Elson, Director of Institutional Programming, will discuss how to access Hoover's research and attendees will meet with other senior program managers to discuss Hoover's research on foreign and domestic policy.*

**2:00 PM – 3:00 PM**

**Library & Archives Presentation**

*Samira Bozorgi, Exhibitions Manager, will show Hoover Library and Archives primary sources including Joan Quigley's notes for President Reagan, WWII diaries, and Records from William F. Buckley Jr.'s Firing Line.*

**3:15 PM – 4:30 PM**

**Inflation and Spending**

*John Cochrane, the Rose-Marie and Jack Anderson Senior Fellow, and Tyler Goodspeed, the Kleinheinz Fellow, will discuss inflation, taxes, and spending.*

**4:45 PM – 5:45 PM**

**The State of American Education**

*Margaret (Macke) Raymond, Distinguished Research Fellow, and Eric Hanushek, Paul and Jean Hanna Senior Fellow in Education, will discuss their research on K–12 issues, including policy challenges as a result of the global pandemic.*

**5:45 PM – 6:30 PM**

**Closing Buffet Dinner**

*Teitworth Terrace, Traitel Memorial Building*

**FRIDAY, AUGUST 26**

**12:40 PM**

**Depart SFO via Alaska 1023**

**4:20 PM**

**Arrive at ANC**



THE HOOVER INSTITUTION IN WASHINGTON  
**STUART FAMILY CONGRESSIONAL FELLOWSHIP PROGRAM**

**AGENDA**

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**Dinner**

*Traitel Pavilion, Traitel Memorial Building*

**THURSDAY, AUGUST 25**

**8:30 AM – 9:00 AM**

**Breakfast**

*Fairweather Courtyard*

**9:00 AM – 10:00 AM**

**Spies, Lies, and Algorithms**

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**Arrive at ANC**



THE HOOVER INSTITUTION IN WASHINGTON  
STUART FAMILY CONGRESSIONAL FELLOWSHIP PROGRAM

<b>Chris Devine</b>	<i>Professional Staff Member - U.S. Senate Budget Committee</i>
<b>Lincoln Foran</b>	<i>Policy Advisor - U.S. Senate Committee on Finance</i>
<b>Alexander Hanson</b>	<i>Senior Advisor - Senator Tom Cotton (AR)</i>
<b>Brian Hughes</b>	<i>Senior Writer and Advisor - U.S. Senator Lisa Murkowski (AK)</i>
<b>John Maniscalco</b>	<i>Legislative Director - Senator Rand Paul (KY)</i>
<b>Adam Michel</b>	<i>Deputy Staff Director - Joint Economic Committee</i>
<b>Christina Salazar</b>	<i>General Counsel and Policy Advisor U.S. Senate Homeland Security &amp; Government Affairs Subcommittee on Emerging Threats &amp; Spending Oversight</i>
<b>Peter Stahley</b>	<i>Professional Staff Member - U.S. Senate Committee on Energy and Natural Resources</i>
<b>Phillip Todd</b>	<i>Economist - U.S. Senate Committee on Small Business and Entrepreneurship</i>

CHRISTOPHER A. COONS, DELAWARE, CHAIRMAN  
JAMES LANKFORD, OKLAHOMA, VICE CHAIRMAN

BRIAN SCHATZ, HAWAII  
JEANNE SHAHEEN, NEW HAMPSHIRE

JAMES E. RISCH, IDAHO  
DEB FISCHER, NEBRASKA

SHANNON HAMILTON KOPPLIN, CHIEF COUNSEL AND STAFF DIRECTOR  
WILLIAM B. CABLE, CHIEF CLERK

HART SENATE OFFICE BUILDING, ROOM 220  
SECOND AND CONSTITUTION AVENUE, NE  
WASHINGTON, DC 20510-6425

TELEPHONE: (202) 224-2981  
FACSIMILE: (202) 224-7416  
TDD: (202) 228-3752

## United States Senate

SELECT COMMITTEE ON ETHICS

August 15, 2022

Brian Hughes  
Office of Senator Lisa Murkowski  
United States Senate  
Washington, DC 20510

Dear Mr. Hughes:

This responds to your recent correspondence requesting approval from the Select Committee on Ethics (the Committee) to accept an invitation you received to travel to the *Stuart Family Congressional Fellowship Program* in Stanford, California, on August 23–26, 2022, sponsored by Stanford University's Hoover Institution (Hoover). Provided that you adhere to the guidance set forth below, it appears that it is permissible for you to accept necessary expenses from Hoover in connection with this trip.

### Background

Based on your communication with the Committee, the background in this matter is as follows.<sup>1</sup> You are employed as the Senior Writer and Advisor in the Office of Senator Lisa Murkowski. Hoover invited you to travel to the *Stuart Family Congressional Fellowship Program* in Stanford, California, on August 23–26, 2022. Hoover certified to the Committee that it will pay the necessary expenses<sup>2</sup> related to the travel and that it is neither a lobbyist, lobbying firm, agent of a foreign principal, or otherwise acting as a representative or agent of a foreign government. Although Hoover retains or employs a federally registered lobbyist or foreign agent, Hoover has certified that it is an organization designated under § 501(c)(3) of the Internal Revenue Code<sup>3</sup> and that no registered lobbyist or agent of a foreign principal will accompany you at any point throughout your trip.<sup>4</sup>

### Discussion

Privately-sponsored travel includes any gift of travel and travel-related expenses for travel outside the Senate duty station, including transportation, lodging, food and refreshments, and conference fees and materials, whether paid for directly, reimbursed, or provided directly,

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<sup>1</sup> If this letter does not correctly recite the facts, contact the Committee immediately.

<sup>2</sup> The term “necessary expenses” has a specific definition. See *Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 8.

<sup>3</sup> 26 U.S.C. § 501(c)(3).

<sup>4</sup> The term “any point throughout your trip” has a specific definition. See *Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 2-3.

from a private individual or entity, in connection with a Member's, officer's, or employee's official Senate duties. Incorporating reforms from the Honest Leadership and Open Government Act of 2007 (HLOGA), Pub. L. 110–81 (2007), Senate Rule 35.2 permits Members, officers, and employees to accept privately-sponsored travel only with the prior written approval of the Committee.

The Committee's approval process is governed by the *Regulations and Guidelines for Privately-Sponsored Travel and Glossary of Terms* (collectively, *Travel Regulations*). The *Travel Regulations* contain detailed requirements regarding who may sponsor travel; time limits for trips; and the type and amount of expenses that can be reimbursed.

Entities that do not retain or employ a lobbyist or foreign agent and all non-profit organizations designated as tax-exempt organizations under § 501(c)(3) of the Internal Revenue Code of 1986, regardless of whether they retain or employ a lobbyist or foreign agent, may sponsor domestic trips for up to three days. The three-day limitation means three 24-hour periods, calculated from the time of arrival in the trip location to the time of departure from the trip location. For such trips, neither lobbyists nor foreign agents may accompany a Senate invitee at any point throughout the trip, other than in a *de minimis* way.<sup>5</sup> This means that neither lobbyists nor foreign agents may accompany Senate invitees at any point to and from the event, at the event itself, or at the location being visited.<sup>6</sup>

Under Senate Rule 35, Senate staff must receive advance authorization signed by the Member or officer under whose direct supervision the individual works in order to accept payment or reimbursement for necessary expenses related to fact-finding travel. Further, such authorization and expenses must be disclosed to the Secretary of the Senate by filing the completed *Employee Pre-Travel Authorization* and the *Employee Post-Travel Disclosure of Travel Expenses* (Form RE-1 and Form RE-2), along with a copy of the *Private Sponsor Travel Certification Form*, and all relevant attachments (e.g., the private sponsor's invitation and itinerary) **within 30 days of the conclusion of Privately-Sponsored Travel**.

Consistent with these standards and Committee precedent and Hoover's factual representations, it appears that it is permissible for you to accept necessary expenses from Hoover in connection with this trip, provided that the actual travel and travel-related expenses conform to the information and materials you provided, and the travel and all required documents are disclosed to the Secretary of the Senate (Office of Public Records).

Finally, Senate Rule 34 requires a reporting individual,<sup>7</sup> on his or her Financial Disclosure Report, to make an annual disclosure of the receipt of payments or reimbursements under Senate Rule 35 from a private sponsor for officially-related travel expenses where, in the

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<sup>5</sup> The term "*de minimis*" has a specific definition. See *Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 3.

<sup>6</sup> See *Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel* at 5; see also *Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 2-3.

<sup>7</sup> A reporting individual is someone whose salary equals or exceeds 120% of the basic rate of pay for GS-15 (\$135,468 for CY 2022) or is a political fund designee and is required to file Financial Disclosure Reports.

aggregate, travel expenses exceed \$415 from that sponsor during a calendar year. However, if a Member, officer, or employee properly reports the receipt of necessary expenses for such travel to the Secretary of the Senate within 30 days of the travel, as discussed above, the travel expenses need not be disclosed a second time on their Financial Disclosure Report.

I hope you find this information helpful. If you have any additional questions, please do not hesitate to contact the Committee.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Shannon Hamilton Kopplin', with a stylized flourish at the end.

Shannon Hamilton Kopplin  
Chief Counsel and Staff Director

Enclosure: Travel Checklist