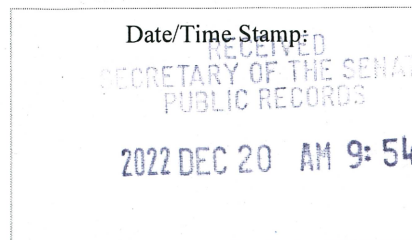


SENATORS AND OFFICERS POST-TRAVEL DISCLOSURE OF TRAVEL EXPENSES



This disclosure, along with a copy of the Private Sponsor Travel Certification Form and all attachments, **MUST** be provided to the **Office of Public Records, Room 232 of the Hart Building**, within **30 days** after the travel is completed.

In compliance with Rule 35.2(a) and (c), I Cynthia Jeanne Shaheen ☒ make the following
(Name of Senator/Officer)
disclosures with respect to travel expenses that have been or will be reimbursed/paid for me.

Private Sponsor(s) (list all): The Panetta Institute for Public Policy
Travel date(s): Thursday, November 10 - Sunday, November 13, 2022

Destination(s): Monterey, California

Name of accompanying family member (if any): William Henry Shaheen
Relationship to Member/Officer: ☒ Spouse ☐ Child

FILL IN THE APPROPRIATE LINES. 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 Senator/Officer:

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses (Amount & Description)
☐ Good Faith Estimate	\$2,244.20	\$276.64 (double occupancy)	\$250	None
☒ Actual Amount				

Expenses for Accompanying Spouse or Dependent Child (if applicable)

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses (Amount & Description)
☐ Good Faith Estimate	\$2,244.20		\$250	None
☐ Actual Amount				

Provide a description of all meetings and events attended. See Senate Rule 35.2(c)(6). (Attach additional pages if necessary.): Attended the Panetta Institute's annual Evening to Honor Lives of Public Service award and dinner as an honoree and received the Jefferson-Lincoln Award for bipartisan service.

I HAVE MADE A DETERMINATION THAT THE TRAVEL DESCRIBED ABOVE WAS IN CONNECTION WITH MY DUTIES AS AN OFFICEHOLDER, AND DID NOT CREATE THE APPEARANCE THAT I WAS USING PUBLIC OFFICE FOR PRIVATE GAIN.

12/15/22
(Date)

(Revised 1/3/11)

Cynthia Jeanne Shaheen
(Signature of Senator/Officer)

Form RE-3

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) 224-7418
TDD: (202) 228-3752

United States Senate

SELECT COMMITTEE ON ETHICS

November 4, 2022

The Honorable Jeanne Shaheen
United States Senate
Washington, DC 20510

Dear Senator Shaheen:

This responds to your recent correspondence requesting approval from the Select Committee on Ethics (the Committee) to accept an invitation you and your spouse received to travel to the *Jefferson-Lincoln Award* ceremony and gala, in Pebble Beach, California on November 11–13, 2022, sponsored by the Panetta Institute for Public Policy (the Panetta Institute). Provided that you adhere to the guidance set forth below, it appears that it is permissible for you to accept necessary expenses from the Panetta Institute in connection with this trip.

Background

Based on your communication with the Committee, the background in this matter is as follows.¹ The Panetta Institute invited you and your spouse to travel to the *Jefferson-Lincoln Award* ceremony and gala, in Pebble Beach, California on November 11–13, 2022. The Panetta Institute certified to the Committee that it will pay the necessary expenses² 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. The Panetta Institute has also certified that it does not retain or employ a registered lobbyist or agent of a foreign principal and that no registered lobbyist or agent of a foreign principal will accompany you at any point throughout your trip.³

Additionally, you inform the Committee that, for a personal purpose, you intend to extend your trip in Pebble Beach for less than a day before the beginning of officially related events and for one day after the conclusion of officially related events. You must pay the cost of any additional expenses incurred as a result of extending your trip.

¹ If this letter does not correctly recite the facts, contact the Committee immediately.

² 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.

³ 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.

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, 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.⁴ 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.⁵

Under Senate Rule 35, a Senator or officer who receives payment or reimbursement for necessary expenses related to fact-finding travel must disclose those expenses to the Secretary of the Senate by filing the completed *Senators and Officers Post-Travel Disclosure of Travel Expenses* (Form RE-3), 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**.⁶

Consistent with these standards and Committee precedent, the Panetta Institute's factual representations, and the guidance contained in this letter regarding extending your trip for a personal purpose, it appears that it is permissible for you to accept necessary expenses from the Panetta Institute 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). Necessary

⁴ 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.

⁵ 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.

⁶ Trip extensions for any purpose do not extend this deadline.

expenses may include travel expenses for the spouse of a Member if the Member determines that the attendance of the spouse is appropriate to assist in the representation of the Senate.

Finally, Senate Rule 34 requires a Member, 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 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,



Shannon Hamilton Kopplin
Chief Counsel and Staff Director

Enclosure: Travel Checklist

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): The Panetta Institute for Public Policy
2. Description of the trip: Senator Shaheen is being honored for her public service at the Twenty-Second Annual Jefferson Lincoln Award ceremony hosted and organized by The Panetta Institute
3. Dates of travel: November 11 to November 13, 2022
4. Place of travel: Final destination: Pebble Beach, California
5. Name and title of Senate invitees: United States Senator Jeanne Shaheen
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:

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:

The Panetta Institute is solely responsible for planning and organizing the trip.

The Panetta Institute presents the Jefferson Lincoln awards every year to honor those
public servants who exemplify a commitment to bipartisan leadership.

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

The Panetta Institute's mission is dedicated to inspiring men and women to lives of public service

Senator Shaheen is receiving the Jefferson-Lincoln Award for her bipartisan service. She exemplifies

the purpose of the award which is dedication to our democracy and bipartisan leadership.

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

Since 2000 we have honored twenty-one U.S. Senators and U.S representatives.

The Panetta Institute has sponsored most. Some have paid for themselves.

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

Leadership Seminar for student body officers; Congressional Internship Program; Leon Panetta Lecture

Series for national political leaders, journalists and policy-thinkers; Policy Research Fellows; Monterey

County Reads for grades 1, 2, and 3.

16. Total Expenses for Each Participant:

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses
☒ Good Faith estimate	\$1,500	\$225 (per night)	\$250 (per person)	
☐ Actual Amounts				

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 without regard to congressional participation.

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

Historically, for twenty-one years, The Inn at Spanish Bay has been the location for this event

because of the convenience of the location for attending guests.

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

The Inn at Spanish Bay, 2700 17 Mile Drive, Pebble Beach, California 93953

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

The hotel has been the location of this event over the past twenty-one years.

Other honorees are staying at the same location.

All awards-related activities and the event will occur at this same location.

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:

The guest meal and guest lodging are above the per diem rates. Senator Shaheen will be staying in a

standard room and will be receiving the same meal as other guests.

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:

Business class airfare is provided.

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:

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: 

Name and Title: Sylvia M. Panetta, Co-Chair and CEO

Name of Organization: The Panetta Institute for Public Policy

Address: 100 Campus Center, Building 86E, CSUMB, Seaside, California

Telephone Number: 831-582-4200

Fax Number: 831-582-4082

E-mail Address: info@panettinstitute.org

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM
SIGNATURE PAGE FOR ADDITIONAL SPONSOR
(to be completed by each additional sponsor)

I hereby *certify* that the information contained on pages 1-4 of the certification form and any accompanying addenda, all submitted in connection with the November 11 - 13, 2022 trip
to Pebble Beach, CA is true, complete, and correct.
Place of Travel *Dates of Travel (Month Day, Year)*

Signature of Travel Sponsor: 

Name and Title: Sylvia M. Panetta

Name of Organization: The Panetta Institute for Public Policy

Address: 100 Campus, Center Building 86-E, Seaside, CA 93955

Telephone Number: 831-582-4200

Fax Number: 831-582-4082

E-mail Address: info@panettainstitute.org

Preliminary Schedule for The Hon. Jeanne Shaheen

Saturday, November 12, 2022

*Jefferson-Lincoln Awards: An Evening to Honor Lives of Public Service***(NOTE: Details subject to change.)**

Saturday, November 12, 2022

- 5:30 p.m. Place: *The Boardroom*, The Inn at Spanish Bay, Pebble Beach.
Event: Pre-Reception. Panetta Institute staff escorts U.S. Senator Jeanne Shaheen and her guest to the Boardroom for pre-reception. Senator Shaheen and her guest meet table host, Don Chapin and other supporters of the Panetta Institute. Photographs are taken.
- 6:15 p.m. Place: *The Boardroom*, The Inn at Spanish Bay.
Event: Senator Shaheen and her guest are escorted to the Ballroom Gallery by table host Mr. Chapin for general reception.
- 6:30 p.m. Place: *The Ballroom Gallery*, The Inn at Spanish Bay, Pebble Beach.
Event: Reception. Wine and hors d'oeuvres reception. (Approximately 400 guests in attendance.)
- 6:45 p.m. Place: *The Ballroom Gallery*, The Inn at Spanish Bay.
Event: Chimes ring for guests to be seated in the Grand Ballroom.
- 6:55 p.m. Place: *The Ballroom Gallery*, The Inn at Spanish Bay.
Event: Chimes ring again for guests to be seated in the Grand Ballroom. Table host Mr. Chapin escorts Senator Shaheen and her guest to their table to take their seats.
- 7:00 p.m. Place: *The Grand Ballroom*, The Inn at Spanish Bay, Pebble Beach.
Event: Table guests are all seated; Master of Ceremonies Fred Keeley announces the start of program with heralding by The Inn at Spanish Bay Bagpiper.
- 7:05 p.m. Place: *The Grand Ballroom*, The Inn at Spanish Bay.
Event: Master of Ceremonies Mr. Keeley recognizes Panetta Institute Board members, sponsors, hosts, dignitaries and special friends and supporters of the Panetta Institute.
- 7:15 p.m. Place: *The Grand Ballroom*, The Inn at Spanish Bay.
Event: Master of Ceremonies introduces Myles Williams to sing *The Star-Spangled Banner*.
- 7:20 p.m. Place: *The Grand Ballroom*, The Inn at Spanish Bay.
Event: Welcoming Remarks and Awards. Master of Ceremonies invites Secretary Panetta and Mrs. Sylvia Panetta to the stage. Secretary and Mrs. Panetta welcome guests and speak about the *Jefferson-Lincoln Awards: An Evening to Honor Lives of Public Service*.

Secretary and Mrs. Panetta call honorees separately to the stage and present brief remarks regarding each honoree's work and present awards individually. Photographs are taken. Each honoree presents prepared remarks and then returns to his/her seat.

Awards are presented in the following order:

Preliminary Schedule for The Hon. Jeanne Shaheen

Saturday, November 12, 2022

*Jefferson-Lincoln Awards: An Evening to Honor Lives of Public Service***(NOTE: Details subject to change.)**

-
- 1) Richard Burr, United States Senator (R), North Carolina;
 - 2) Adam D. Kinzinger, United States Representative (R), 16th District of Illinois;
 - 3) Jeanne Shaheen, United States Senator (D), New Hampshire;
 - 4) Bennie G. Thompson, United States Representative (D) 2nd District, South Carolina

Secretary and Mrs. Panetta then return to their seats for dinner.

- 8:00 p.m. Place: *The Grand Ballroom*, The Inn at Spanish Bay.
Event: First course is served.
- 8:30 p.m. Place: *The Grand Ballroom*, The Inn at Spanish Bay.
Event: Second course is served.
- 9:00 p.m. Place: *The Grand Ballroom*, The Inn at Spanish Bay.
Event: Entree is served.
- 10:00 p.m. Place: *The Grand Ballroom*, The Inn at Spanish Bay.
Event: Dessert is served.
- 10:25 p.m. Place: *The Grand Ballroom*, The Inn at Spanish Bay.
Event: Program ends with concluding remarks from Master of Ceremonies followed by closing song by Myles Williams.
Then: Panetta Institute staff escorts Shaheen and her guest to their room.
Nothing further scheduled.