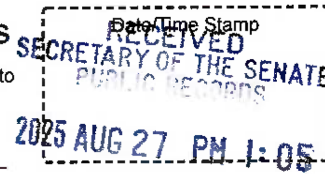


RE-2 Employee Post Travel Disclosure of Travel Expenses

Post Travel Filing Instructions: Complete this form within **30 days** of returning from travel. Submit all forms to the Office of Public Records in 144 Hart Building. **This form is a public disclosure. The form and all attachments will be made publicly available.**



Certification: In compliance with the Regulations Governing Privately Sponsored Travel, Senate Rule 35, and the Honest Leadership and Open Government Act of 2007, I certify that I accepted the following gift of privately sponsored travel:

Private Sponsor(s):

Conservative Climate Foundation

Travel Dates:

8/5/2025-8/7/2025

Name of accompanying family member (if any):

Relationship to Traveler:

Total Expenses

Transportation Expenses	Lodging Expenses	Meals Expenses	Other Expenses (Amount & Description)
659.97	540.44	422.20	

I also certify that attached to this form are all required documents for post travel disclosure, including:

- The final **Employee Pre-Travel Authorization** (Form RE-1)
- The final **Private Sponsor Travel Certification Form** with all attachments
- The final invitation
- The final approved itinerary

Finally, I certify that all trip information reflected in the attachments above accurately reflects the travel that I accepted. If there were any changes to the trip after I received approval from the Committee, the changes are described in ATTACHMENT 1.

8/27/25

Adam Cloch

Adam Cloch

Date

Printed Name of Traveler

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.

8/27/25

Date

Signature of Supervising Senator/Officer

ATTACHMENT 1 – CHANGES FROM APPROVED PRE-TRAVEL

Note: Material changes to a trip that occur after the Committee has issued an approval letter may invalidate the Committee's approval. Please contact the Committee with any questions regarding changes to an approved trip.

Were there any changes to the pre-approved travel expenses? (Transportation, Meals, Lodging, Other)?

☐ Yes ☒ No

Expense Change

Revised Amount

Explanation

Were there any changes to the pre-approved itinerary?

☐ Yes ☒ No

Explanation:

Were there any additional changes to the pre-approved trip?

☐ Yes ☒ No

Explanation:

RE-1 Employee Pre-Travel Authorization

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

Date/Time Stamp

Name of Traveler:

Adam Cloch

Employing Office/Committee:

Senator John Curtis

Private Sponsor(s):

Conservative Climate Foundation

Destination(s):

Grand Rapids, MI

Travel Dates:

8/5/2025-8/7/2025

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

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

Senator Curtis serves on the EPW Committee, and as his Communications Director, I help convey the Senator's message on environment and public works policy. The trip activities will inform my communications on these policy issues.

Do you have an accompanying family member or spouse on this trip?

Name and Relationship to Traveler:

☐

(signify "yes" by checking box)

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

7/23/25

Date

Adam Cloch

Signature of Employee

Digitally signed by Adam Cloch

Date: 2025.07.23 14:06:58 -04'00'

TO BE COMPLETED BY SUPERVISING MEMBER/OFFICER

(President of the Senate, Secretary of the Senate, Sergeant at Arms,
Secretary for the Majority, Secretary for the Minority, and Chaplain)

Senator John Curtis

(Print Senator's/Officer's Name)

hereby authorize

Adam Cloch

(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)

7/23/25

Date

Signature of Supervising Senator/Officer

Trip Name: CCF 4th Annual Communicators' Retreat

Organization Information

Organization Name:

Conservative Climate Foundation

Is your organization classified as a §501(c)(3)?

☒ Yes ☐ No

If Yes, §501(c)(3) Organization Type:

☐ Private Foundation ☒ Public Charity

Address:

10340 Democracy Lane, Suite 300

Phone Number:

703-383-1330

City, State, Zip:

Fairfax, VA 22030

Organization URL:

www.rightonclimate.org

History of Congressional Travel

Describe your organization's history of sponsoring congressional travel.

The Conservative Climate Foundation (CCF) has successfully hosted the below privately sponsored travel events:

- 1) the UNFCCC Conference of Parties (COP) in Ireland in 2021, in Egypt in 2022, in Dubai in 2023, and Baku in 2024.
- 2) the Communicators' Retreat in Easton, MD in 2022, in Charleston, SC in 2023, and in Asheville, NC in 2024.

Educational Activities

Describe the educational activities performed by your organization other than sponsoring congressional travel.

CCF serves as a resource to the conservative climate community by hosting a regular series of events inside and outside of the beltway to educate and socialize Members of Congress, congressional staff, and the public.

Lobbyist and Foreign Agent Registration Information

Lobbyist Registration Status (Select one):

- ☒ I certify that the sponsor is not a federally registered lobbyist and does not retain or employ a federally registered lobbyist.
- ☐ I certify that the sponsor is not a federally registered lobbyist but does retain or employ one or more federally registered lobbyists.

Foreign Agent Registration Status (Select one):

- ☐ I certify that the sponsor is not an agent of a foreign principal and does not retain or employ an agent of a foreign principal.
- ☐ I certify that the sponsor is not an agent of a foreign principal but does retain or employ one or more agents of a foreign principal.

Foreign Government Involvement

Foreign Agent Registration Status (Must select all):

- ☒ I certify that the sponsor is not a foreign government.
- ☒ I certify that the sponsor is not an entity that is owned or operated by a foreign government.
- ☒ I certify that the sponsor does not receive funding from a foreign government.

Purpose and Details

Provide a brief description of the trip.

The Communicators' Retreat is a professional development conference that will help communications professionals from different sectors learn best practices around communication on climate issues. The retreat will include a series of panels, workshops, speakers, and site visits that will deepen participants understanding of climate policy and the most effective way to create messaging campaigns around the issues.

Explain how the purpose of the trip relates to your organization's mission.

The Conservative Climate Foundation's (CCF) mission is to engage and inform the public and policymakers about reducing global and domestic emissions with common sense, economic, and environmentally sustainable strategies and solutions based on conservative principles.

This retreat will engage and inform our audience, communications professionals from both the public and private sectors, on the merits of good, sustainable climate policy. By educating and engaging these professionals, we are accomplishing our mission.

Is your organization the only sponsor for this trip?

☒ Yes ☐ No

If No, describe your organization's role in planning the trip.

If there are multiple sponsors, each sponsor must submit Organization Information (Page 1 of the Private Sponsor Travel Certification Form) and a Signature Page Form.

Grantmaking Organizations (Optional)

If you have a Grantmaking Organization, you must attach a Grantmaking Organization Certification Form.

- 1.
- 2.
- 3.

With or Without Regard to Congressional Participation (Select one):

- ☒ The trip is arranged or organized without regard to congressional participation.
- ☐ The trip is arranged or organized with regard to congressional participation.

Lobbyist/Foreign Agent Involvement in Planning, Organizing, Requesting or Arranging

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

Lobbyist/Foreign Agent Financing (Must select all):

- ☒ The trip will not be financed in any part by a registered lobbyist or agent of a foreign principal.
- ☒ No funds or in-kind contributions were 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.

Lobbyist/Foreign Agent Accompaniment

Complete if all sponsors are §501(c)(3) organizations (Select one):

- ☒ The trip is limited to three days (for trips inside the continental United States) or seven days (for trips outside the continental United States), and no lobbyist or agents of a foreign principal will accompany the Member, officer, or employee at any point throughout the trip
- ☐ The trip is limited to 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
- ☐ The trip is limited to 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

Complete if any of the sponsors is not a §501(c)(3) organizations (Select one):

- ☐ No sponsor retains or employs a registered lobbyist or agent of a foreign principle, the trip is limited to three days (for trips inside the continental United States) or seven days (for trips outside the continental United States), and no lobbyist or agents of a foreign principal will accompany the Member, officer, or employee at any point throughout the trip
- ☐ The trip is limited to 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
- ☐ The trip is limited to 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

Required if selecting the third option in either column - Please explain why the second overnight stay is practically required and necessary to accomplish the purpose of the trip.

Certification of No Recreational Activity and No Alcohol (Must select all):

- ☒ Travel expenses paid for will not include expenditures for recreational activities.
- ☒ Travel expenses paid for will not include expenditures for alcohol, except as permitted by the Regulations Governing Privately Sponsored Travel.

Invitees list

- ☒ A list of all Senate invitees is attached to this form (required).
- ☒ Members and staff from the House of Representatives will also receive invitations.

Travel Details (Submit additional pages as needed)

Trip Start Date/Time:
August 5, 2025



Trip End Date/Time:
August 7, 2025

Will the traveler be accompanied by a family member for whom the sponsor will pay travel expenses?

☐ Yes ☒ No

Transportation (Member/Officer/Employee: \$⁹⁴¹ Accompanying Family Member: \$_____)

Transportation Type	Class	Amount
Flight (roundtrip)	Economy	\$847
Bus (local ground transportation)	n/a	\$94

Details (optional)

Lodging (Member/Officer/Employee: \$⁴⁵⁸ Accompanying Family Member: \$_____)

Check-In	Check-Out	Facility	City	State	Country
8/5/25	8/7/25	Amway Grand Hotel	Grand Rapids	MI	USA
Nights	Cost/Night	Cost Exceed Per Diem (Yes/No)	If Yes, please explain why expenses over the per diem rate are reasonable and necessary.		
2	\$229	Yes	Attached		

Check-In	Check-Out	Facility	City	State	Country
Nights	Cost/Night	Cost Exceed Per Diem (Yes/No)	If Yes, please explain why expenses over the per diem rate are reasonable and necessary.		

Check-In	Check-Out	Facility	City	State	Country
Nights	Cost/Night	Cost Exceed Per Diem (Yes/No)	If Yes, please explain why expenses over the per diem rate are reasonable and necessary.		

Meals (Member/Officer/Employee: \$467 Accompanying Family Member: \$_____)

Date	Breakfast	Lunch	Dinner	Incidentals	Total	City	State	Country	Cost Exceeds Per Diem (Y/N)
8/5/25		\$54	\$115		\$169	Grand Rapids	MI	USA	Y
8/6/25	\$36	\$46	\$143		\$225	Grand Rapids	MI	USA	Y
8/7/25	\$36	\$37			\$73	Grand Rapids	MI	USA	Y

If costs exceed the federal per diem, please explain why expenses over the per diem rate are reasonable and necessary.

Attached

Reasonable Miscellaneous Expenses

(Member/Officer/Employee: \$_____ Accompanying Family Member: \$_____)

Expense Type	Amount	Notes
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Additional Details (optional)

PRIVATELY SPONSORED TRAVEL

SPONSOR SIGNATURE PAGE

I hereby certify that the information submitted in connection with the trip listed below is true, complete, and correct to the best of my knowledge and belief.

Trip Name: CCF 4th Annual Communicators' Retreat
August 5-7, 2025
Travel Date(s):
Grand Rapids, MI
Travel Destination(s):
Sponsor: Conservative Climate Foundation

Elizabeth Daniels
(printed name of sponsor representative)

Executive Director
(title)



(signature of sponsor representative)

6/25/25

(date)

ANSWER TO HOTEL PER DIEM QUESTION: The hotel was chosen because of conference space available, proximity to airport and possible site visits, and room capacity. Prices are high in the area in general but are increased during tourist season.

ANSWERS TO MEALS PER DIEM QUESTION: Congressional participants will be given meals commensurate with other non-congressional participants. CCF selected meals for the conference participants based on location (hotel catering for the meals at the conference venue) and cost and selected vendors that were deemed of reasonable quality and price-point. The tourist season and nature of large-scale event catering has elevated the costs beyond per diem rates.

INVITE LIST: *CCF invited Communications Directors from every Republican Senate office and relevant committees with an interest in clean energy and climate policy. In the case that the Communications Director was unavailable, or the position wasn't filled, we extended the invite to another relevant communications member of the staff.*

- Laura Mengelkamp, Communications Director, Sen. John Barrasso
- Spencer Hurwitz, Communications Director, Sen. Marsha Balckburn
- Sara Lasure, Communications Director, Sen. John Boozman
- Zach Riddle, Communications Director, Sen. Mike Braun
- Sean Ross, Communications Director, Sen. Katie Britt
- Mike Reynard, Communications Director, Sen. Ted Budd
- Kelley Moore, Communications Director, Sen. Shelley Moore Capito
- Joe Ramallo, Communications Director, Sen. Bill Cassidy
- Blake Kemen, Communications Director, Sen. Susan Collins
- Natalie Yezbick, Communications Director, Sen. John Cornyn
- Caroline Tabler, Communications Director, Sen. Tom Cotton
- Jason Bohrer, Communications Director, Sen. Kevin Cramer
- Melanie Lawhorn, Communications Director, Sen. Mike Crapo
- Darin Miller, Communications Director, Sen. Ted Cruz
- Adam Cloch, Communications Director, Sen. John Curtis
- Rachel Dumke, Communications Director, Sen. Steve Daines
- Palmer Brigham, Communications Director, Sen. Joni Ernst
- Craig Wheeler, Communications Director, Sen. Deb Fischer
- Taylor Reidy, Communications Director, Sen. Lindsey Graham
- Clare Slattery, Communications Director, Sen. Chuck Grassley
- Abigail Jackson, Communications Director, Sen. Josh Hawley

- Kami Capener, Communications Director, Sen. John Hoeven
- Olivia Tripodi, Communications Director, Sen. Jon Husted
- Chris Gallegos, Communications Director, Sen. Cindy Hyde-Smith
- Kiersten Pels, Communications Director, Sen. Ron Johnson
- Jessica Andrews, Communications Director, Sen. John Kennedy
- Billy Gribbin, Communications Director, Sen. Mike Lee
- Katie Warbinton, Communications Director, Sen. Cynthia Lummis
- Charyssa Parent, Communications Director, Sen. Roger Marshall
- Meghan Rodgers, Communication Director, Sen. Dave McCormick
- Angela Lingg, Communications Director, Sen. Jerry Moran
- Reagan McCarthy, Communications Director, Sen. Bernie Moreno
- Kate Currie, Communications Director, Sen. Markwayne Mullin
- Joe Plesha, Communications Director, Sen. Lisa Murkowski
- Noah Sadlier, Communications Director, Sen. Pete Ricketts
- Janessa Tolman, Communications Director, Sen. Jim Risch
- Lydia Hall, Communications Director, Sen. Mike Rounds
- Demarion Johnson, Communications Director, Sen. Tim Scott
- Amanda Coyne, Communications Director, Sen. Dan Sullivan
- Ryan Wrasse, Communications Director, Sen. John Thune
- Adam Webb, Communications Director, Sen. Thom Tillis
- Matt Lahr, Communications Director, Sen. Todd Young

**4th Annual Communicators Retreat****August 5-7, 2025 | Grand Rapids, MI***This is a working agenda and is subject to change.***Tuesday, August 5****Arrival Flight***American Airlines – Nonstop – DCA-GRR 11:36 AM – 1:28 PM***2:00 – 2:30 PM***Travel to Amway Grand Hotel***2:30 – 3:00 PM***Arrive at Amway Grand Hotel, check into hotel rooms***3:00 – 3:30 PM****PANEL:** Introduction to the Conservative Climate Caucus

- Location: Amway Grand Hotel, Imperial Ballroom
- Representatives from the Conservative Climate Caucus will give an overview of their work and introduce the ways in which they can serve as a resource for individuals looking to better communicate climate issues to conservative audiences.
- Speakers:
 - Anthony Fakhoury, Communications Director, Rep. Mariannette Miller-Meeks (R-IA)
 - Elizabeth Daniels, Executive Director, Conservative Climate Foundation

3:30 – 4:30 PM**BRIEFING:** Winning the Message

- Location: Amway Grand Hotel, Imperial Ballroom
- ClearPath Chief External Affairs Officer Luke Bolar shares insights and messaging strategies from a 6-year research project studying how Americans view clean energy policy.
- Speakers:
 - Luke Bolar, Chief External Affairs Officer, ClearPath

4:30 – 6:00 PM

Executive Time

6:00 – 9:00 PM

SPEAKER: Reception & Dinner

- Location: TBD
- Welcome to Grand Rapids, Michigan! The keynote speaker will highlight Michigan's clean energy initiatives that create jobs and strengthen local economies.
- Speakers:
 - Heather Reams, Board Chair, Conservative Climate Foundation
 - TBD

RON

Amway Grand Hotel

Wednesday, August 6**9:00 – 10:00 AM**

BRIEFING: Welcome to the 4th Annual Communicators Retreat

- Location: Amway Grand Hotel, Imperial Ballroom
- During this breakfast briefing, CCF will go over the retreat schedule and point out important retreat logistics. The speaker will give an overview of what attendees have learned thus far at the Communicators' Retreat and real-world applications.
- Speaker:
 - Elizabeth Daniels, Executive Director, Conservative Climate Foundation

10:00 – 11:00 AM

PANEL: Life After Capitol Hill

- Location: Amway Grand Hotel, Imperial Ballroom
- This session explores the different pathways offered to Capitol Hill communicators, from corporations and trade associations to nonprofits and PR firms. Attendees will learn how the skills they've honed, such as media engagement, message crafting, and strategic communications, seamlessly translate to new roles in the private sector.
- Speakers:
 - TBD

11:00 AM – 12:00 PM

BRIEFING: Meeting Demand for AI

- Location: Amway Grand Hotel, Imperial Ballroom
- The rise of artificial intelligence creates challenges and opportunities for communicators. This session will explore how companies are meeting growing energy demand for AI, as well as how they are incorporating AI technologies into their day-to-day operations.
- Speakers:
 - TBD

12:00 – 12:30 PM

Lunch served

12:30 – 1:30 PM

PANEL: Creating a Narrative

- Location: Amway Grand Hotel, Imperial Ballroom
- This session will teach attendees how to create a narrative based on real-life examples. From site visits and field tours to international climate engagements, attendees will learn what goes into crafting a positive message for conservative audiences.
- Speakers:
 - TBD

1:30 – 2:00 PM

Executive Time

2:00 – 3:00 PM

Travel to boat tour

3:00 – 5:00 PM

TOUR: Local Conservation Efforts

- Location: Holland Princess, 260 Howard Ave, Holland, MI 49424
- Attendees will be joined by local conservationists who will share how they are working to protect local environments, including coastline restoration efforts, local species conservation, and disaster mitigation. They will share how they message these efforts to communities in order to gain local support for the projects.
- Speakers:

- TBD

5:00 – 6:00 PM

Travel to dinner location

6:00 – 8:00 PM

SPEAKER: Reception & Dinner

- Location: Founders Brewing, 235 Cesar E. Chavez Ave SW, Grand Rapids, MI 49503
- The speaker will highlight sustainability efforts in the beer making industry, including water conservation, responsible agriculture, and waste mitigation. Attendees will learn how local breweries are working to lower their carbon footprint and message their efforts to the surrounding communities.
- Speaker:
 - TBD

8:00 – 8:30 PM

Travel to Amway Grand Hotel

RON

Amway Grand Hotel

Thursday, August 7**9:00 – 10:00 AM**

BRIEFING: Lessons Learned

- Location: Amway Grand Hotel, Imperial Ballroom
- During this breakfast briefing, CCF will highlight lessons learned throughout the retreat and answer any questions about previous sessions and travel logistics.
- Speaker:
 - Elizabeth Daniels, Executive Director, Conservative Climate Foundation

10:00 – 11:00 AM

BRIEFING: Case Study: Palisades Nuclear Power Plant Reopening

- Location: Amway Grand Hotel, Imperial Ballroom
- A representative from the Palisades Nuclear Power Plant will present a case study on the reopening of the power plant, from securing financing to securing community support. The presentation will include how their team leveraged about media

tactics, community engagement, and government relations to successfully bring carbon-free nuclear power to Michigan.

- Speaker:
 - TBD

11:00 – 11:15 AM

Executive Time

11:15 – 11:45 AM

Travel to Grand Rapids International Airport

Departing Flight

American Airlines – Nonstop – GRR-DCA 1:58 PM – 3:34 PM

Wednesday, July 23, 2025 at 2:07:40 PM Eastern Daylight Time

Subject: INVITE: CCF Communicators' Retreat

Date: Monday, June 23, 2025 at 9:10:05 AM Eastern Daylight Time

From: Conservative Climate Foundation

To: Cloch, Adam (Curtis)



JOIN US FOR THE 4TH ANNUAL

COMMUNICATORS' RETREAT

Grand Rapids

AUGUST 5-7, 2025

CCF brings together communications professionals in the conservative space from the U.S. House, U.S. Senate, and CCF member organizations to learn, network, and collaborate on effective climate messaging.

Space is limited and available on a first come, first serve basis.

ETHICS DEADLINE IS JULY 3 - RSVP TODAY!

The Conservative Climate Foundation will, in accordance with House and Senate ethics regulations, pay for your travel, lodging, and conference-related expenses. Any non-conference related expenses will be at your own expense. Participants employed by the House of Representatives and Senate will be required to submit paperwork for privately sponsored travel to their respective ethics committees in advance of and after the retreat.

More information will be provided closer to the event.

RSVP TODAY!



[Conservative Climate Foundation](#)

If you no longer wish to receive these emails, you can [unsubscribe](#) at any time

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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

United States Senate

SELECT COMMITTEE ON ETHICS

August 1, 2025

Adam Cloch
Office of Senator John R. Curtis
United States Senate
Washington, DC 20510

Dear Mr. Cloch:

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 *Communicators' Retreat* in Grand Rapids, Michigan, on August 5–7, 2025, sponsored by Conservative Climate Foundation (CCF). Provided that you adhere to the guidance set forth below, it appears that it is permissible for you to accept necessary expenses from CCF in connection with this trip.

Background

Based on your communication with the Committee, the background in this matter is as follows.¹ You are employed as the Communications Director for the Office of Senator John R. Curtis. CCF invited you to travel to the *Communicators' Retreat* in Grand Rapids, Michigan, on August 5–7, 2025. CCF 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. CCF 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

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

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* at 10-13.

³ The term "any point throughout your trip" has a specific definition. See *Select Committee on Ethics Regulations and Guidelines for Privately Sponsored Travel* at 15.

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 (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, 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 CCF's factual representations, it appears that it is permissible for you to accept necessary expenses from CCF 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,⁶ on their 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 \$480 from that sponsor during a calendar year. However, if a Member,

⁴ The term "*de minimis*" has a specific definition. See *Select Committee on Ethics Regulations and Guidelines for Privately Sponsored Travel* at 6-8.

⁵ See *Select Committee on Ethics Regulations and Guidelines for Privately Sponsored Travel* at 6-10.

⁶ A reporting individual is someone whose salary equals or exceeds 120% of the basic rate of pay for GS-15 (\$150,160 for CY 2025) or is a political fund designee and is required to file financial disclosure reports.

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: Employee Privately Sponsored Travel Checklist