



# **FARA Zombies**

How Some Retired Politicians Use Leftover  
Campaign Funds to Advance Their Careers as  
Foreign Agents



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## ACKNOWLEDGMENTS

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## FARA Zombies

On June 20, 2018, Representative Charlie Crist (D-FL) sent to Saudi Arabia’s ambassador a letter that, according to Foreign Agents Registration Act (FARA) records, was drafted by a lobbyist for Qatar.<sup>1</sup>

One month later, Qatar’s lobbyist—former Representative Jim Moran (D-VA)—gave Crist’s campaign \$1,000.<sup>2</sup> It was the first time Moran had ever donated to Crist.<sup>3</sup>

But the \$1,000 contribution to Crist did not come from Moran’s personal bank account: It came from his old Congressional campaign funds.

Moran’s last election was in 2012. He left office in January 2015 with \$330,000 in his campaign account.<sup>4</sup> But instead of winding down the account—say, by giving the remaining funds to charity—he has apparently used leftover campaign cash to help facilitate influence-peddling on behalf of foreign lobbying clients. In 2017 and 2018, Moran used unspent campaign funds to give tens of thousands of dollars to at least a dozen Congressional or Senatorial campaigns within one year of him or his firm contacting those same members’ offices on behalf of Qatar.

Moran is not alone. Data obtained from the Center for Responsive Politics and cross-referenced with Federal Election Commission (FEC) records show that at least 17 former members of Congress have registered under FARA as agents of foreign governments or political parties since 2014 while maintaining active campaign committees still stocked with millions in funds raised from their time in office.

About half of those foreign agents have used leftover campaign funds to contribute to the same legislators they’ve lobbied on behalf of foreign clients, according to the Campaign Legal Center (CLC)’s review of FARA records and campaign finance reports, conducted in collaboration with the *Daily Beast*. In some cases, the contributions were made within days or weeks of a lobbying contact.

Examples like these add another dimension to the familiar but ever-expanding story of money, influence, and access in Washington.

It is common knowledge that some politicians leave Congress and head to K Street, where they leverage the connections with former colleagues and insider knowledge developed during public service to promote their lobbying clients’ interests.

And it has been well-documented how lobbyists make political contributions to buy access and influence. As Mick Mulvaney memorably described the “hierarchy” his office had when deciding whom to let in the door: “If you were a lobbyist who never gave us money, I didn’t talk to you. If you were a lobbyist who gave us money, I might talk to you.”<sup>5</sup>

But the Congressional revolving door and cash-for-access systems become even more concerning when politicians-turned-lobbyists use leftover campaign funds to promote the interests of foreign governments—not to mention their own lobbying careers.

The examples in this report further illustrate the problematic ways that politicians continue to dip into their leftover campaign funds long after they stop running for office, and underscore why the FEC should issue clear rules for so-called “zombie campaigns”—both to lay out permissible uses for campaign funds once members leave office, and to prevent former officeholders from keeping their dormant campaign committees open indefinitely. If the FEC won’t act, then Congress must.

## Leftover Campaign Cash for Access

Federal law states that campaign contributions can only be used in support of a candidate's run for office, their duties as an officeholder, or a limited number of other purposes, like charitable donations or contributions to state and local candidates. Once a person leaves office and is no longer a candidate, spending from an old campaign account can become increasingly dubious as a former politician transitions further into private life and the private sector. That spending raises more red flags if the former politician has become a lobbyist.

Because the FEC has failed to write rules requiring that campaign committees shut down after a person stops becoming a candidate—or at least clarifying the permissible uses of those leftover campaign funds—many former members appear to have treated their old campaign accounts as slush funds.

In 2018, reporting by the *Tampa Bay Times* and *WTSP-TV* revealed that dozens of former officeholders have continued dipping into their campaign accounts for years after leaving office, using campaign funds for apparently personal expenses like country club dues, cell phone bills, and salaries to family members.<sup>6</sup>

This report shows that some former officeholders are also using leftover campaign funds to grease the wheels for foreign interests.

It is not known whether the members of Congress who receive contributions from foreign agents factor them into decisions about meetings or official action—and this report does not allege any improper behavior on the part of the recipients—but the striking pattern of donations and lobbying contacts suggests that the foreign agent donors hope that they will.

Making political contributions can be a permissible method of winding down an old campaign account, but these examples demonstrate a problematic pattern where lawmakers-turned-foreign agents are using campaign funds to make contributions that advance their post-congressional careers and their lobbying on behalf of foreign governments.

Without clear FEC rules, some former politicians are making up their own.

### *James P. "Jim" Moran, Jr.*

Moran is a prominent lobbyist at the firm McDermott Will & Emery with years of insider experience and connections. But he has also apparently used leftover campaign funds to help open new doors on behalf of his foreign government lobbying clients like Qatar, which pays Moran's firm \$40,000 per month to lobby on its behalf.<sup>7</sup>

On June 20, 2018, Moran used leftover campaign funds to give \$1,000 to the campaign of Senator Bob Menendez (D-NJ),<sup>8</sup> the ranking member on the Senate Foreign Relations Committee. Moran's campaign had never contributed to Menendez previously.<sup>9</sup> The next day, four other McDermott lobbyists and partners gave Menendez' campaign a total of \$3,950 using their personal funds.<sup>10</sup>

One week after Moran's contribution, Menendez used his powerful post on the committee to block U.S. arms sales to Qatar's regional rival, Saudi Arabia.<sup>11</sup> A week after that, Moran emailed Menendez' chief of staff with a draft letter that he wanted sent to the Saudi ambassador.<sup>12</sup> The letter expressed concern about the impact of a Saudi-led blockade on mixed-nationality families in Qatar.<sup>13</sup> It was nearly identical to the letter that Moran had successfully encouraged Representative Crist to send.

Moran's firm also asked Representative Bill Keating (D-MA) to send a similar letter on June 20, 2018.<sup>14</sup> Two months later, on August 10, Moran used leftover campaign funds to give \$2,000 to Keating's campaign.<sup>15</sup> Shortly after that contribution, Moran attended a fundraiser for Keating on Nantucket, where Moran charged the \$1,927 hotel bill to his old campaign account, too.<sup>16</sup>

Moran had also given to Keating's campaign in the prior year. In May of 2017, Moran used his old campaign account to give \$2,000 to Keating's campaign,<sup>17</sup> and in July and September, contacted Keating's office at least three times more on behalf of Qatar, including one discussion with Keating himself.<sup>18</sup> That same month, on September 20, 2017, Moran for Congress gave Keating's campaign another \$500.<sup>19</sup>

### *Jeff Miller*

Moran's partner at McDermott Will & Emery, former Representative Jeff B. Miller (R-FL), has demonstrated a similar pattern. Miller left office in January 2017 with \$220,000 remaining in his campaign account.<sup>20</sup> Federal law prohibits a member of Congress from representing, aiding, or advising a foreign government for one year after leaving office,<sup>21</sup> but just seven months after his term ended, Miller registered as a foreign agent on behalf of Qatar.<sup>22</sup> The law also barred Miller from lobbying his former colleagues for one year,<sup>23</sup> and just after the one-year bar ended in early 2018, he began using leftover campaign funds to make thousands of dollars in contributions to the same members of Congress he was contacting on behalf of the Qatari government.

In May 2018, Miller used unspent campaign funds to give, for the first time, \$2,000 to the campaign of Representative Michael Turner (R-OH),<sup>24</sup> then the chair of the House Armed Services Subcommittee on Tactical Air and Land Forces; this contribution came a month after Miller's firm invited Turner to a reception with the emir of Qatar.<sup>25</sup> He gave \$1,000 to Representative Joe Wilson's (R-SC) campaign,<sup>26</sup> five weeks after Wilson hosted the emir at a Qatar-U.S. economic forum in South Carolina.<sup>27</sup> And Miller used his old campaign funds to give Wilson's committee another \$1,000 later that year,<sup>28</sup> after months of McDermott Will & Emery repeatedly contacting Wilson's office on Qatar's behalf.<sup>29</sup> Wilson is part of the Congressional Caucus on Qatari-American Economic Strategic Defense, Cultural and Educational Partnership.<sup>30</sup>

### *Howard P. "Buck" McKeon*

Qatar's lobbying efforts are often aimed at blunting U.S. support for its top regional rival, Saudi Arabia<sup>31</sup>—which itself employs a legion of lobbyists.<sup>32</sup>

Former Representative Howard P. "Buck" McKeon (R-CA) is one of the most prominent.

McKeon, the former chair of the House Armed Services Committee, left Congress in January 2015 with about \$287,000 in remaining campaign funds.<sup>33</sup> Shortly after leaving office, McKeon became chairman and CEO of McKeon Group, where he lobbies on behalf of foreign interests like Saudi Arabia and defense contractors like Lockheed Martin.<sup>34</sup> Saudi Arabia reportedly pays McKeon Group a \$50,000 per month retainer, and transferred \$450,000 to McKeon Group three days after the murder of journalist Jamal Khashoggi.<sup>35</sup>

In May 2018, on Saudi Arabia's behalf, McKeon's firm contacted the chief of staff to Senator James Inhofe (R-OK)—who had recently taken the helm of the Senate Armed Services Committee<sup>36</sup>—to discuss the 2019 National Defense Authorization Act (NDAA).<sup>37</sup> The NDAA was going through the

markup process and Democrats were expected to insert language cutting U.S. support for Saudi Arabia's war in Yemen.<sup>38</sup>

Several weeks later, McKeon used his old campaign funds to write Inhofe's campaign a \$1,000 check.<sup>39</sup> Over the next five months, McKeon gave Inhofe an additional three contributions totaling \$3,000,<sup>40</sup> and, during the same period, his firm reported multiple contacts with Inhofe's office on behalf of Saudi Arabia.

For example, on November 14, 2018, as the Senate was considering a War Powers Act resolution to end support for Saudi Arabia in Yemen, McKeon used campaign funds to give Inhofe's campaign \$1,000.<sup>41</sup> On that same day, McKeon's firm contacted Inhofe's military legislative assistant on behalf of Saudi Arabia, followed by another call two weeks later regarding the War Powers Act resolution.<sup>42</sup> (The same day as that call, McKeon reported emailing Saudi Arabia an update "regarding conversation with Inhofe Staff."<sup>43</sup>) Inhofe ultimately voted against the resolution.<sup>44</sup>

Inhofe has been in the Senate since 1994. But McKeon never contributed until Inhofe took control of an important Senate committee that affects the interests of his foreign lobbying client.<sup>45</sup>

Nor had McKeon ever contributed to Senator Roy Blunt (R-MO), the chair of the Senate Appropriations Subcommittee on Defense, who has been in the Senate since 2011.<sup>46</sup> But just as Blunt's subcommittee was taking up the NDAA, on July 6, 2018, McKeon gave Blunt's campaign \$1,000, using leftover campaign funds.<sup>47</sup> McKeon then called Blunt twice to discuss a proposed Democratic amendment to end U.S. support for Saudi Arabia's military intervention in Yemen.<sup>48</sup> The amendment ultimately was not included in the NDAA.<sup>49</sup>

Also in 2018, McKeon lobbied multiple Republican House members to cosponsor a Saudi-supported bill (H.R. 4603) targeting Iran's support for Houthi rebels in Yemen—while using his old campaign account to make thousands in contributions to at least five members shortly before or after those contacts. For example, between March and July 2018, McKeon gave two contributions totaling \$2,000 to Representative Steve Russell's (R-OK) campaign,<sup>50</sup> and then in August and September his firm lobbied Russell's office twice on H.R. 4603.<sup>51</sup> McKeon gave Representative Joe Wilson's (R-SC) campaign two \$1,000 contributions in 2018 and 2019,<sup>52</sup> and, in between those contributions, arranged a meeting between Wilson and the Saudi Ambassador on July 11, 2018.<sup>53</sup> As the Center for Responsive Politics reported, Wilson signed on as a cosponsor to H.R. 4603 five days later.<sup>54</sup>

Saudi Arabia is not McKeon's only client.

Shortly before President Trump's inauguration, an Albanian political party and its head, Ilir Meta (who is now Albania's president and who, according to Freedom House, is "perceived by many citizens [of Albania] to be a symbol of corruption"<sup>55</sup>), retained McKeon Group for help with "[a]rranging attendance to the Trump 2017 Inauguration" and "[a]rranging [to] meet key DC leaders during the Trump Inauguration."<sup>56</sup>

The day before President Trump's inauguration, on January 19, 2017, McKeon's firm arranged a meeting between the Albanians and then-House Foreign Affairs Committee chair Representative Ed Royce (R-CA).<sup>57</sup> Less than two weeks later, McKeon used leftover campaign funds to give Royce's campaign \$2,000.<sup>58</sup> (McKeon Group also arranged pre-inauguration meetings between its Albanian clients and two other House members whose campaigns had received contributions from McKeon within the previous year.<sup>59</sup>)

Royce had been in office since 1993, but this was the first time McKeon had contributed to his campaign.<sup>60</sup>

In the two months after that contribution, McKeon Group reported another four contacts with Royce's office,<sup>61</sup> this time on behalf of a shell company that, according to *Mother Jones*, appears to be a front for that same Albanian political party.<sup>62</sup>

### Trent Lott

Former Senate Majority Leader Trent Lott (R-MS) is another former member-turned-lobbyist for Saudi Arabia.<sup>63</sup> He left the Senate in 2007 with \$1.5 million remaining in his campaign account.<sup>64</sup> The next year, he converted his campaign committee to a multicandidate PAC, but funds raised while he was still a candidate remain subject to the same rules.

Despite being out of office for over a decade, Lott is continuing to use his old campaign funds to contribute to the Congressional offices his firm is lobbying on behalf of foreign governments like Saudi Arabia. For example, after Lott gave \$1,000 to Senate Armed Services Committee member Senator Roger Wicker's (R-MS) campaign in June 2016,<sup>65</sup> his firm contacted Wicker's office four times over the next five months on behalf of Saudi Arabia.<sup>66</sup>

### Christopher "Kit" Bond

When he left the Senate in 2011, former Senator Christopher "Kit" Bond (R-MO) had \$224,000 left in his campaign account.<sup>67</sup> He soon converted it to a PAC—"KITPAC"—but raised no new contributions after leaving office.<sup>68</sup>

In late 2017, Bond, who had worked on NAFTA in the 1990s, registered under FARA as a representative for Mexico's Office of Economic Affairs to lobby on issues related to trade policy.<sup>69</sup> During 2018's NAFTA renegotiation talks,<sup>70</sup> Bond's firm met with then-Senator Dean Heller's (R-NV) tax counsel and Heller himself on February 7, 2018 and May 20, 2018, respectively, about NAFTA.<sup>71</sup> At the time, Heller sat on a Senate Finance subcommittee that held hearings over NAFTA renegotiations.<sup>72</sup> Two days after that second meeting, KITPAC contributed \$1,000 to Heller for Senate.<sup>73</sup> That contribution marked one of only two contributions KITPAC made that year, and it marked the first contribution KITPAC or Missourians for Kit Bond had ever made to Heller.<sup>74</sup>

Some former members may think they can avoid the ban on personal use of campaign funds by converting their campaigns to political action committees (PACs), but that's not what the law says. Whether sitting in a dormant campaign account or rolled over to a PAC, contributions received by a candidate or officeholder remain subject to the personal use ban.

### Robert E. "Bud" Cramer, Jr.

Former Representative Bud Cramer (D-AL) left office in January 2009 with \$1.4 million left in his campaign account.<sup>75</sup> From 2014 through 2015, he was registered as a foreign agent for the Hong Kong Trade Development Council.<sup>76</sup> During that period, Cramer met with at least nine members of Congress who also received contributions from his old campaign committee within a year of their meeting. One of those contributions, to Ben Cardin for Senate, came the same day that Cramer met with Senator Cardin to discuss "issues related to possible reintroduction of S. 2922 – Hong Kong Human Rights and Democracy Act."<sup>77</sup>

## Conclusion

Donors who gave to support a candidate's run for office probably didn't expect that their money would be used years later to promote the interests of Qatar, Saudi Arabia, or Albania—not to mention the former member's lobbying career.

Federal law requires that campaign funds be used to support a candidate's run for office and duties as an officeholder. These rules help limit the potentially corrupting influence of contributions, which pose a greater risk of buying influence if the lawmaker can use the funds for personal benefit. And influence-seeking donors may have a particular incentive to curry favor with outgoing officeholders by contributing to a campaign war chest that the officeholders will never use for campaigning, but which they can later use to advance their post-congressional careers.

In February 2018, CLC filed a rulemaking petition calling for the FEC to clarify how former lawmakers can use leftover campaign funds, and to place a time limit on how long campaign accounts can remain open.<sup>78</sup>

Following CLC's petition, the FEC has begun to more closely scrutinize spending by zombie campaigns. In May 2019, the agency sent letters to dozens of former candidates' campaign committees asking for clarification about particular expenditures, and inquiring about whether the committees are winding down.<sup>79</sup> But that closer administrative scrutiny likely won't capture the misuses of leftover campaign funds described in this report.

Moran's campaign, for example, responded to the FEC's letter by declaring that "[t]he Committee will continue to make contributions to federal and non-federal committees."<sup>80</sup> McKeon's campaign committee told the FEC that "[r]emaining funds will be contributed to other federal candidate committees until the committee is terminated."<sup>81</sup>

The law generally permits a former lawmaker to use campaign funds for political contributions, so it can be difficult to distinguish a retired member making contributions to support their party from a politician-turned-lobbyist giving money to advance their lobbying career. The FEC typically does not check whether a former member has become a lobbyist or an agent of a foreign government, much less whether contributions from their old campaign committee are being used in support of lobbying.

This is why the FEC should prevent former officeholders from keeping their dormant campaign committees open indefinitely, in addition to clarifying permissible uses for the funds while the committees do remain active. As former members get farther and farther from their time in public office, the universe of plausible officeholder-related expenses shrinks ever smaller, so keeping campaigns open for years can invite abuse.

Congress could go further, and, in fact, both Republican and Democratic officeholders have called for limits on former officials leveraging their public service for foreign or domestic lobbying clients. Senator Ted Cruz wants to prohibit former members from ever becoming lobbyists.<sup>82</sup> Senator Elizabeth Warren would ban paid lobbying on behalf of foreign governments, and also would ban lobbyists from contributing to candidates or Members of Congress.<sup>83</sup> President Trump's ethics pledge bars executive branch political appointees from becoming agents of foreign governments after leaving office,<sup>84</sup> and, as a candidate, Trump additionally called for limits on foreign lobbyists raising money in U.S. elections.<sup>85</sup>



At a minimum, Congress could prohibit politicians-turned-lobbyists from using leftover campaign funds to make contributions. Congress could also require that former members shut down their campaign committees after becoming agents of foreign governments, or after becoming registered lobbyists.

Such steps could go a long way toward curbing the abuses documented in this report, and they could also help chip away at the broader systems of money, access, and influence that help abuses like these thrive.

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- <sup>1</sup> McDermott Will & Emery LLP, Informational Materials (State of Qatar, Ambassador Sheikh Meshal bin Hamad Al Thani), NSD/FARA Registration Unit, at 21-23 (July 15, 2018), <https://efile.fara.gov/docs/6447-Informational-Materials-20180715-2.pdf>.
- <sup>2</sup> Moran for Congress, Disbursements to Charlie Crist for Congress, FEC.gov, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00241349&recipient\\_name=C00590067](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00241349&recipient_name=C00590067) (last visited July 18, 2019).
- <sup>3</sup> *Id.*
- <sup>4</sup> Moran for Congress, Financial summary, 2015-16, FEC.gov, <https://www.fec.gov/data/committee/C00241349/?cycle=2016> (last visited July 18, 2019).
- <sup>5</sup> Renae Merle, *Mulvaney discloses 'hierarchy' for meeting lobbyists, saying some would be seen only if they paid*, WASH. POST (Apr. 25, 2018), [https://www.washingtonpost.com/news/business/wp/2018/04/25/mick-mulvaney-faces-backlash-after-telling-bankers-if-you-were-a-lobbyist-who-never-gave-us-money-i-didnt-talk-to-you/?utm\\_term=.9c5785348038](https://www.washingtonpost.com/news/business/wp/2018/04/25/mick-mulvaney-faces-backlash-after-telling-bankers-if-you-were-a-lobbyist-who-never-gave-us-money-i-didnt-talk-to-you/?utm_term=.9c5785348038).
- <sup>6</sup> Christopher O'Donnell, Eli Murray, Connie Humburg & Noah Pransky, *Zombie Campaigns*, TAMPA BAY TIMES (Jan. 31, 2018), <http://www.tampabay.com/projects/2018/investigations/zombie-campaigns/spending-millions-after-office/>.
- <sup>7</sup> James P. Moran, Short Form Registration Statement, at 2 (Form NSD-6) (July 27, 2017), <https://efile.fara.gov/docs/6447-Short-Form-20170727-2.pdf>.
- <sup>8</sup> Moran for Congress, Disbursements to Menendez for Senate, FEC.gov, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00241349&recipient\\_name=C00264564](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00241349&recipient_name=C00264564) (last visited July 18, 2019).
- <sup>9</sup> *Id.*
- <sup>10</sup> Menendez for Senate, Receipts from McDermott Will & Emery employees, June 21, 2018, FEC.gov, [https://www.fec.gov/data/receipts/?data\\_type=processed&committee\\_id=C00264564&contributor\\_employer=mcdermott&min\\_date=06%2F21%2F2018&max\\_date=06%2F21%2F2018](https://www.fec.gov/data/receipts/?data_type=processed&committee_id=C00264564&contributor_employer=mcdermott&min_date=06%2F21%2F2018&max_date=06%2F21%2F2018) (last visited July 21, 2019). Three months earlier, McDermott Will & Emery's corporate PAC also gave \$2,500 to Menendez's campaign. McDermott Will & Emery LLP PAC, Disbursements to Menendez for Senate, 2017-18, FEC.GOV, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00299701&recipient\\_name=C00264564&two\\_year\\_transaction\\_period=2018](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00299701&recipient_name=C00264564&two_year_transaction_period=2018) (last visited July 19, 2019).
- <sup>11</sup> Press Release, Bob Menendez for New Jersey, Menendez Demands More Answers from Trump Admin Before Letting Arms Sales to United Arab Emirates and Saudi Arabia Move Forward (June 28, 2018), <https://www.menendez.senate.gov/news-and-events/press/menendez-demands-more-answers-from-trump-admin-before-letting-arms-sales-to-united-arab-emirates-and-saudi-arabia-move-forward>.
- <sup>12</sup> McDermott Will & Emery LLP, Informational Materials (State of Qatar, Ambassador Sheikh Meshal bin Hamad Al Thani), NSD/FARA Registration Unit, at 1-2 (July 15, 2018), <https://efile.fara.gov/docs/6447-Informational-Materials-20180715-2.pdf>.
- <sup>13</sup> *Id.* at 1.
- <sup>14</sup> *Id.* at 37-42.
- <sup>15</sup> Moran for Congress, Disbursements to The Bill Keating Committee, 2017-18, FEC.gov, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00241349&recipient\\_name=keating&two\\_year\\_transaction\\_period=2018](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00241349&recipient_name=keating&two_year_transaction_period=2018) (last visited July 18, 2019).
- <sup>16</sup> Fredreka Schouten, *Hotel bills, dues: Regulators question whether ex-lawmakers are using donors' money for personal expenses*, CNN (May 31, 2019), <https://www.cnn.com/2019/05/31/politics/fec-leftover-campaign-funds/index.html>; see also Moran for Congress, Disbursements to Jared Coffin House, 2018, FEC.gov, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00241349&recipient\\_name=jared+coffin+house&two\\_year\\_transaction\\_period=2018&min\\_date=01%2F01%2F2018&max\\_date=12%2F31%2F2018](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00241349&recipient_name=jared+coffin+house&two_year_transaction_period=2018&min_date=01%2F01%2F2018&max_date=12%2F31%2F2018) (last visited July 21, 2019).
- <sup>17</sup> Moran for Congress, Disbursements to The Bill Keating Committee, 2017-18, *supra* note 15.
- <sup>18</sup> McDermott Will & Emery LLP, Supplemental Statement for Six Month Period Ending Jan. 31, 2018, at 11 (Form NSD-2) (Mar. 2, 2018), <https://efile.fara.gov/docs/6447-Supplemental-Statement-20180302-1.pdf>.
- <sup>19</sup> Moran for Congress, Disbursements to The Bill Keating Committee, 2017-18, *supra* note 15.
- <sup>20</sup> Jeff Miller for Congress, Financial summary, 2017-18, FEC.gov, <https://www.fec.gov/data/committee/C00366757/?cycle=2018> (last visited July 18, 2019).
- <sup>21</sup> 18 U.S.C. § 207(f).
- <sup>22</sup> Jefferson Bingham Miller, Short Form Registration Statement, at 1 (Form NSD-6) (July 27, 2017), <https://efile.fara.gov/docs/6447-Short-Form-20170727-4.pdf>.
- <sup>23</sup> 18 U.S.C. § 207(e)(1)(B).

- <sup>24</sup> Jeff Miller for Congress, Disbursements to Citizens for Turner, FEC.gov, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00366757&recipient\\_name=C00373001](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00366757&recipient_name=C00373001) (last visited July 18, 2019).
- <sup>25</sup> McDermott Will & Emery LLP, Supplemental Statement for Six Month Period Ending July 31, 2018, at 12 (Form NSD-2) (Aug. 30, 2018), <https://efile.fara.gov/docs/6447-Supplemental-Statement-20180830-3.pdf>.
- <sup>26</sup> Jeff Miller for Congress, Disbursements to Joe Wilson for Congress, FEC.gov, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00366757&recipient\\_name=C00368522](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00366757&recipient_name=C00368522) (last visited July 18, 2019).
- <sup>27</sup> *H.E Qatar's Minister of Economy and Commerce meets with congressman and representative for South Carolina's 2<sup>nd</sup> congressional district*, Qatar Ministry of Commerce and Industry (Apr. 17, 2018), [https://www.moci.gov.qa/en/mec\\_news/h-e-qatars-minister-of-economy-and-commerce-meets-with-congressman-and-representative-for-south-carolinas-2nd-congressional-district/](https://www.moci.gov.qa/en/mec_news/h-e-qatars-minister-of-economy-and-commerce-meets-with-congressman-and-representative-for-south-carolinas-2nd-congressional-district/).
- <sup>28</sup> Jeff Miller for Congress, Disbursements to Joe Wilson for Congress, *supra* note 26.
- <sup>29</sup> McDermott Will & Emery LLP, Supplemental Statement for Six Month Period Ending July 31, 2018, *supra* note 25, at 11-14.
- <sup>30</sup> *Caucuses*, U.S. Congressman Joe Wilson, <https://joewilson.house.gov/about/caucuses> (last visited July 17, 2019).
- <sup>31</sup> Bethany Allen-Ebrahimian & Rhys Dubin, *Qatar's Ramped-Up Lobbying Efforts Find Success in Washington*, FOREIGN POLICY (Feb. 6, 2018), <https://foreignpolicy.com/2018/02/06/qatars-ramped-up-lobbying-efforts-find-success-in-washington/>.
- <sup>32</sup> Richard Lardner, *Saudis Have a \$6 Million Lobbying Payroll Despite Departures*, ASSOCIATED PRESS (Oct. 16, 2018), <https://www.apnews.com/35d82edecf3e48f6802386087df8178b>.
- <sup>33</sup> Friends of Buck McKeon, Financial summary, 2015-16, FEC.gov, <https://www.fec.gov/data/committee/C00258244/?cycle=2016> (last visited July 18, 2019).
- <sup>34</sup> Jay Cassano, *Is This Ex-Congressman Using His Leftover Campaign Funds To Help Lobbying Clients?*, SLUDGE (June 25, 2018), <https://readsludge.com/2018/06/25/is-this-ex-congressman-using-his-leftover-campaign-funds-to-help-lobbying-clients/>.
- <sup>35</sup> Anna Massoglia & Karl Evers-Hillstrom, *Ex-Congressman McKeon Doubles Down on Saudi Arabia Lobbying Efforts*, CTR. FOR RESPONSIVE POLITICS (Jan. 17, 2019), <https://www.opensecrets.org/news/2019/01/ex-congressman-mckeon-doubles-down-on-saudi-arabia-lobbying-efforts/>; The McKeon Group, Supplemental Statement for Six Month Period Ending Nov. 30, 2018, at 5 (Form NSD-2) (Dec. 30, 2018), <https://efile.fara.gov/docs/6391-Supplemental-Statement-20181230-4.pdf>.
- <sup>36</sup> See, e.g., Burgess Everett, *McCain's Absence Handcuffs Republicans*, POLITICO (May 8, 2018), <https://www.politico.com/story/2018/05/08/john-mccain-senate-republicans-impact-574875>. Inhofe served as acting Chair of the Senate Armed Services Committee during Sen. John McCain's absence from the Senate. Inhofe formally became chair of the panel in 2019.
- <sup>37</sup> The McKeon Group, Supplemental Statement for Six Month Period Ending May 31, 2018, at 10 (Form NSD-2) (June 29, 2018), <https://efile.fara.gov/docs/6391-Supplemental-Statement-20180629-3.pdf>.
- <sup>38</sup> See, e.g., Rebecca Kheel, *Lawmakers Seek to limit U.S. Involvement in Yemen's Civil War*, THE HILL (May 18, 2018), <https://thehill.com/policy/defense/388327-slew-of-defense-bill-amendments-target-us-involvement-in-yemen-civil-war>.
- <sup>39</sup> Friends of Buck McKeon, Disbursements to Friends of Jim Inhofe, FEC.gov, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00258244&recipient\\_name=C00207993](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00258244&recipient_name=C00207993) (last visited July 18, 2019).
- <sup>40</sup> *Id.*
- <sup>41</sup> *Id.*
- <sup>42</sup> The McKeon Group, Supplemental Statement for Six Month Period Ending Nov. 30, 2018, *supra* note 35, at 11.
- <sup>43</sup> *Id.* at 11.
- <sup>44</sup> *Roll Call Vote 115th Congress – 2nd Session*, U.S. SENATE (Dec. 13, 2018), [https://www.senate.gov/legislative/LIS/roll\\_call\\_lists/roll\\_call\\_vote\\_cfm.cfm?congress=115&session=2&vote=00266](https://www.senate.gov/legislative/LIS/roll_call_lists/roll_call_vote_cfm.cfm?congress=115&session=2&vote=00266).
- <sup>45</sup> Friends of Buck McKeon, Disbursements to Friends of Jim Inhofe, *supra* note 39.
- <sup>46</sup> Friends of Buck McKeon, Disbursements to Friends of Roy Blunt, FEC.gov, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00258244&recipient\\_name=C00304758](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00258244&recipient_name=C00304758) (last visited July 21, 2019).
- <sup>47</sup> Friends of Buck McKeon reported giving the contribution to Blunt's campaign on July 6 (for the 2018 House primary). Friends of Buck McKeon, 2018 October Quarterly, at 9 (FEC Form 3) (filed Sept. 30, 2018), <https://docquery.fec.gov/cgi-bin/fecimg/?201810039124282450>. However, Blunt's committee reported receiving the contribution on June 30, for the 2022

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Senate primary. Friends of Roy Blunt, 2018 July Quarterly, at 57 (FEC Form 3) (filed July 12, 2018), <https://docquery.fec.gov/cgi-bin/fecimg/?201807180200574154>.

<sup>48</sup> McKeon reported calling Sen. Blunt on August 9 and September 20 “to discuss Sen. Murphy bill.” The McKeon Group, Supplemental Statement for Six Month Period Ending Nov. 30, 2018, *supra* note 35, at 11. Sen. Chris Murphy (D-CT) proposed an amendment to cut off funding for Saudi Arabia’s war in Yemen. Press Release, Chris Murphy, Murphy Amendment Cuts off Funds for War in Yemen until Pentagon Certifies Saudi-Led Coalition is Not Violating International Law and U.S. Policy (Aug. 17, 2018), <https://www.murphy.senate.gov/newsroom/press-releases/murphy-amendment-cuts-off-funds-for-war-in-yemen-until-pentagon-certifies-saudi-led-coalition-is-not-violating-international-law-and-us-policy>.

<sup>49</sup> H.R. 6157, 115th Cong. (2018).

<sup>50</sup> Friends of Buck McKeon, Disbursements to Steve Russell for Congress, 2017-18, FEC.gov, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00258244&recipient\\_name=C00558510&two\\_year\\_transaction\\_period=2018](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00258244&recipient_name=C00558510&two_year_transaction_period=2018) (last visited July 18, 2019).

<sup>51</sup> The McKeon Group, Supplemental Statement for Six Month Period Ending Nov. 30, 2018, *supra* note 35, at 11.

<sup>52</sup> Friends of Buck McKeon, Disbursements to Joe Wilson for Congress, 2017-19, FEC.gov, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00258244&recipient\\_name=C00368522&two\\_year\\_transaction\\_period=2018&two\\_year\\_transaction\\_period=2020](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00258244&recipient_name=C00368522&two_year_transaction_period=2018&two_year_transaction_period=2020) (last visited July 18, 2019).

<sup>53</sup> The McKeon Group, Supplemental Statement for Six Month Period Ending Nov. 30, 2018, *supra* note 35, at 10

<sup>54</sup> Massoglia & Evers-Hillstrom, *supra* note 35.

<sup>55</sup> FREEDOM HOUSE. NATIONS IN TRANSIT 2018: ALBANIA (2018), <https://freedomhouse.org/report/nations-transit/2018/albania>.

<sup>56</sup> Howard P. “Buck” McKeon, Short Form Registration Statement, at 3 (Form NSD-6) (Dec. 30, 2018), <https://efile.fara.gov/docs/6391-Short-Form-20170106-8.pdf>.

<sup>57</sup> The McKeon Group, Supplemental Statement for Six Month Period Ending May 30, 2017, at 11 (Form NSD-2) (June 20, 2017), <https://efile.fara.gov/docs/6391-Supplemental-Statement-20170620-1.pdf>.

<sup>58</sup> Friends of Buck McKeon, Disbursements to Royce Campaign Committee, FEC.gov, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00258244&recipient\\_name=C00200865](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00258244&recipient_name=C00200865) (last visited July 18, 2019).

<sup>59</sup> Namely, Congressmen Mike Conaway (R-TX) and Mike Turner (R-OH). See The McKeon Group, Supplemental Statement for Six Month Period Ending May 30, 2017, *supra* note 57, at 11; Friends of Buck McKeon, Disbursements, 2017-18, FEC.gov, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00258244](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00258244) (last visited July 19, 2019).

<sup>60</sup> Friends of Buck McKeon, Disbursements to Royce Campaign Committee, *supra* note 58.

<sup>61</sup> The McKeon Group, Supplemental Statement for Six Month Period Ending May 30, 2017, *supra* note 57, at 11.

<sup>62</sup> Hannah Levintova & Dan Friedman, *How a Mysterious Overseas Shell Company Used a Former GOP Congressman to Lobby Trump and Congress*, MOTHER JONES (Apr. 25, 2018), <https://www.motherjones.com/politics/2018/04/how-a-mysterious-overseas-shell-company-used-a-former-gop-congressman-to-lobby-trump-and-congress/>.

<sup>63</sup> See, e.g., Trent Lott, Short Form Registration Statement, at 1 (Form NSD-6) (Sept. 20, 2016), <https://efile.fara.gov/docs/2165-Short-Form-20160920-640.pdf>.

<sup>64</sup> The New Republican Majority Fund, Financial Summary, 2007-08, FEC.gov, <https://www.fec.gov/data/committee/C00219220/?cycle=2008> (last visited July 21, 2019).

<sup>65</sup> The New Republican Majority Fund, Disbursements to Wicker for Senate, 2015-16, FEC.gov, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00219220&recipient\\_name=C00443218&two\\_year\\_transaction\\_period=2016](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00219220&recipient_name=C00443218&two_year_transaction_period=2016) (last visited July 18, 2019).

<sup>66</sup> Squire Patton Boggs (US) LLP, Supplemental Statement for Six Month Period Ending Dec. 31, 2016, at 29, 30 (Form NSD-2) (Jan. 30, 2017), <https://efile.fara.gov/docs/2165-Supplemental-Statement-20170130-25.pdf>.

<sup>67</sup> KITPAC, Financial Summary, 2011-12, FEC.gov, <https://www.fec.gov/data/committee/C00216705/?cycle=2012> (last visited July 21, 2019).

<sup>68</sup> KITPAC, Individual contributions, 2011-19, FEC.gov, [https://www.fec.gov/data/individual-contributions/?committee\\_id=C00216705&two\\_year\\_transaction\\_period=2012&two\\_year\\_transaction\\_period=2014&two\\_year\\_transaction\\_period=2016&two\\_year\\_transaction\\_period=2018&two\\_year\\_transaction\\_period=2020](https://www.fec.gov/data/individual-contributions/?committee_id=C00216705&two_year_transaction_period=2012&two_year_transaction_period=2014&two_year_transaction_period=2016&two_year_transaction_period=2018&two_year_transaction_period=2020) (last visited July 21, 2019).

<sup>69</sup> Christopher S. “Kit” Bond, Short Form Registration Statement, at 1 (Form NSD-6) (Nov. 9, 2017), <https://efile.fara.gov/docs/6486-Short-Form-20171109-6.pdf>.

<sup>70</sup> Megan Cassella, *Deal or no deal. NAFTA edition*. POLITICO (May 16, 2018), <https://www.politico.com/newsletters/morning-trade/2018/05/16/deal-or-no-deal-nafta-edition-220008>

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- <sup>72</sup> Press Release, U.S. Senate Committee on Finance, Hatch, Wyden Announce Finance Subcommittee Assignments for 115th Congress (Feb. 7, 2017), <https://www.finance.senate.gov/chairmans-news/hatch-wyden-announce-finance-subcommittee-assignments-for-115th-congress->
- <sup>73</sup> KITPAC, Disbursements to Heller for Senate, FEC.GOV, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00216705&recipient\\_name=C00494229](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00216705&recipient_name=C00494229) (last visited July 21, 2019).
- <sup>74</sup> *Id.*; KITPAC, Disbursements, 2018, FEC.GOV, [https://www.fec.gov/data/disbursements/?data\\_type=processed&committee\\_id=C00216705&two\\_year\\_transaction\\_period=2018&min\\_date=01%2F01%2F2018&max\\_date=12%2F31%2F2018](https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00216705&two_year_transaction_period=2018&min_date=01%2F01%2F2018&max_date=12%2F31%2F2018) (last visited July 21, 2019) (showing only one other reported disbursement, a \$2,000 political contribution, in 2018).
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