

Richard Kessler and the Ripon Groups:

**How Lobbyists Give Lawmakers Free Trips
Despite the Ban on Lobbyist-Funded Travel**



**Congress Watch
January 2006**

Acknowledgments

Former Senior Researcher Karen Robb is the primary author of *Richard Kessler and the Ripon Groups: How a Washington Lobbyist Gives Lawmakers Free Trips Despite the Ban on Lobbyist-Funded Travel* with contributions from Research Director Taylor Lincoln and Researcher Conor Kenny. Congress Watch Director Frank Clemente provided significant editorial guidance for this report and is its primary editor. Former Director of Investigations Brad White also provided editorial guidance and made substantial editing contributions. Intern David Kling did the substantial database research required to compile the campaign contribution statistics. Research assistant Kevin O'Connor tabulated much of the lobbying data contained in the report.

About Public Citizen

Public Citizen is a 150,000 member non-profit organization based in Washington, D.C. We represent consumer interests through lobbying, litigation, research and public education. Founded in 1971, Public Citizen fights for consumer rights in the marketplace, safe and affordable health care, campaign finance reform, fair trade, clean and safe energy sources, and corporate and government accountability. Public Citizen has five divisions and is active in every public forum: Congress, the courts, governmental agencies and the media. Congress Watch is one of the five divisions.



Public Citizen's Congress Watch
215 Pennsylvania Ave. S.E.
Washington, D.C. 20003
P: 202-546-4996
F: 202-547-7392
<http://www.citizen.org>

©2006 Public Citizen. All rights reserved.
Price \$25.00

Call Public Citizen's Publication Office, 1-800-289-3787 for additional orders and pricing information, or consult our web site at www.citizen.org.
Major credit cards accepted. Or write to:

Members Services
Public Citizen
1600 20th Street, N.W.
Washington, D.C. 20009

Table of Contents

Executive Summary	1
The Ripon Educational Fund: A Non-profit Gambit	3
Figure 1: Ripon Educational Fund Board Members, 2003 and 2004	5
The Ripon Society: A Partisan Smokescreen	7
Figure 2 Ripon Society Board Members in 2004	9
Century Business Services: Kessler’s Parent Company Pretense	10
Kessler’s Lobbying Clients: The Corporate Client Cover	11
Figure 3 Lawmaker Travel Paid for by Kessler’s Lobbying Clients	12
Solution: Congress Should Prohibit Privately Funded Travel	13
Appendix A:	14
Kessler Business Services’ Lobbying Clients, 1998 to 2004	14
Appendix B Congressional Recipients of Trips From the Ripon Groups and Kessler’s Lobbying Clients and Parent Company	15
Endnotes	22

Executive Summary

Public Citizen has found that control of two non-profit groups by prominent Washington lobbyist Richard Kessler, head of Kessler Business Services, and numerous other influence-peddlers closely associated with Kessler, have allowed those lobbyists to spend millions of dollars taking members of Congress on luxurious trips to Europe and U.S. resorts without technically violating congressional ethics rules that forbid lobbyists from paying for congressional travel.

The activities these lobbyists undertook and the means by which they got around congressional rules include:

- **Free Travel:** Federal lawmakers have reported receiving more than \$1 million in free travel from two non-profit groups, the Ripon Educational Fund and the Ripon Society (hereafter collectively known as the Ripon groups) and from companies Kessler appears to control or influence. That is about 6 percent of the \$17.6 million lawmakers reported receiving in free travel from private companies and organizations from 2000 to mid-2005. Overall, the Ripon groups are ranked second, after the leader the Aspen Institute, when it comes to spending on congressional travel during that period. The two non-profits, gave \$742,000 in free trips to lawmakers from 2000 to mid-2005. Moreover, 11 of Kessler's corporate clients for which he lobbies gave lawmakers at least \$273,000 in free travel from 2000 to mid-2005, and five lawmakers reported receiving \$36,000 in free travel from Kessler's parent company for a 2003 trip to Scotland.
- **Leading lawmakers have taken Ripon's luxury trips:** Attendees on Ripon groups trips have included Rep. John Boehner (R-Ohio), who is seeking to be the next House Majority Leader (two trips costing a total of at least \$13,920); Rep. Deborah Pryce (R-Ohio), Republican Conference Chairwoman (one trip costing \$9,050); Rep. Bob Ney (Ohio), who has temporarily stepped down as chairman of the House Administration Committee (one trip costing \$5,400); Rep. Michael G. Oxley (R-Ohio), chairman of the House Financial Services Committee (five trips costing \$51,629); and Rep. Bill Thomas (R-Calif.), chairman of the House Ways and Means Committee (two trips costing a total of at least \$24,519).
- **The Ripon Educational Fund:** Founded by Kessler in the early 1980s, the 501(c)(3) fund usually takes lawmakers to European capitals purportedly to discuss policy with their foreign counterparts. The major destinations have been Rome (2000), Scotland (2001), San Francisco and Los Angeles (2002), London (2003) and Budapest (2004). Lobbyists outnumbered lawmakers five-to-one on the fund's 2003 trip to London. Kessler was finance chair on the board in 2003 and while he was not on the board in 2004, the vice president of Kessler Business Services remained there. While lawmakers reported receiving almost \$700,000 in free trips from the fund from 2000 to mid-2005, Ripon's actual costs were much higher. It reported spending \$4.6 million between 2000 and 2004 on trips for lawmakers. Ten of the fund's twelve total board members in 2003 and 2004 were registered lobbyists. Two, including Kessler, were from Kessler's lobbying shop. Corporate employers of the others paid Kessler more than \$1.6 million to lobby for them from 1998 to 2004.

- **The Ripon Society:** Kessler is president of this 501(c)(4) group, which claims to be a moderate Republican think tank, but 99 percent of its \$1.45 million in 2004 revenue came from special events where the speakers were lawmakers and many of the guests were lobbyists. In January 2005, the society spent more than \$32,000 to take nine lawmakers to a Florida conference that was advertised as being dominated by policy discussions but later praised by its executive director for producing “enthraling” interactions between the society’s corporate members and its lawmaker guests who traveled all expenses paid. All seven of the society’s board members in 2004 were registered lobbyists.
- **Lobbyist Dominated Boards:** Altogether, a total of 19 board members guided the two non-profits in 2003 and 2004, 17 of whom are registered lobbyists, including Kessler himself and the vice president of his lobbying firm. At least ten of the board members lobby for major Kessler clients such as the Altria Group Inc., the Grocery Manufacturers of America and Pfizer Inc. Three lobby for Amgen Inc., which has paid Kessler \$761,000 between 1998 and 2004 to lobby.
- **Profitable Relationships:** Kessler has profited handsomely from his relationships with the Ripon groups’ board members. The companies they lobby for have paid him at least \$3.3 million for lobbying services between 1998 and 2004.
- **Client-Paid Travel:** Lawmakers have reported receiving 96 free trips valued at more than \$273,000 from 1998 to mid-2005 from 11 of Kessler’s lobbying clients. One of the biggest spenders on congressional travel is Burlington Northern Santa Fe Corp. It gave lawmakers nearly \$63,000 in free travel from 2000 to mid-2005 and paid Kessler nearly \$1.2 million for lobbying services from 1998 to 2004. Another long-term client of Kessler’s, Pfizer Inc., paid him \$530,000 in lobbying fees from 1998 to 2004 and gave lawmakers \$22,000 in free trips from 2000 to mid-2005.
- **Campaign Contributions:** The 41 lawmakers who have attended the Ripon groups’ trips have also benefited from the generosity of the groups’ board members and the companies they lobby for. The 19 total board members in 2003 and 2004 contributed at least \$236,000 to the Ripon travelers’ campaigns and PACs from 1997 to mid-2005. Eleven corporate PACs controlled by the board members’ employers contributed more than \$2 million to the 41 lawmakers during the same period.
- **Nepotism?:** Kessler has staffed the Ripon Society with his sister, Robin Kessler, who works as its corporate finance director, and Elvis Oxley, who resigned as executive director in June 2005. Elvis Oxley is the son of influential Rep. Michael G. Oxley (R-Ohio), who was one of the Ripon groups’ most frequent travelers, having taken five trips at their expense at a cost of more than \$51,000 from 2000 to mid-2005.
- **Stopping the Travel Schemes:** To stop lobbyists and other interest groups from currying favor with legislators, Public Citizen urges Congress to forbid lawmakers and their staff from taking trips paid for by private organizations.

The Ripon Educational Fund: A Non-profit Gambit

Altogether, lawmakers have reported receiving more than \$1 million in free travel from 2000 to mid-2005 from the Ripon groups, Kessler's clients and his parent company. That is about 6 percent of the \$17.6 million lawmakers have reported receiving in free travel from private companies and organizations from 2000 to mid-2005. Overall, the Ripon groups ranked second, after the leader the Aspen Institute, when it comes to spending on congressional travel during that period.¹

About 70 percent of the \$1 million in Kessler-related travel spending was funneled through the Ripon Educational Fund, a 501(c)(3) non-profit to which contributions are tax deductible.

Most years, the fund sponsors a conference in Europe and invites about 20 lawmakers, nearly all of whom are Republicans, on these all expenses paid trips. Between 2000 and mid-2005, 41 lawmakers reported receiving \$698,000 in free trips from the fund.² According to the fund's IRS 990 financial disclosure forms, the group spent a total of \$4.6 million to hold at least five conferences between 2000 and 2004, including in Rome (2000), Scotland (2001), San Francisco and Los Angeles (2002), London (2003) and Budapest (2004), and it took five lawmakers to California in 2002.³

While the fund's sole purpose appears to be to organize and finance fancy conclaves between lobbyists and members of Congress, its non-profit educational status affords a convenient cover for Kessler and his fellow lobbyists. Lawmakers get to go on luxurious trips, bringing family members along in the majority of cases, while the lobbyists get to accompany them and pay the bills. In the process, everyone avoids openly violating the ethics rules that forbid lobbyists from paying for travel.

According to Kessler's biography on Century Business Services' Web site, Kessler Business Services' parent company, Kessler himself oversaw the development of the Ripon Educational Fund Transatlantic Conference while he was executive director of the fund's affiliate group the Ripon Society.⁴ He assumed that position in 1981 after working on President-elect Ronald Reagan's inauguration and held it until 1983. He founded Kessler & Associates, the precursor to Kessler Business Services, in 1987.

The trips Ripon sponsors are supposed to "enlighten debate on major public and international policy issues by facilitating the exchange of ideas between senior American and foreign government officials, scholars, corporate leaders and other public policy experts."⁵

The corporate leaders referred to in its mission statement who go on the trips typically turn out to be registered lobbyists. In fact, the 19 lawmakers who went on Ripon's 2003 London trip were outnumbered five-to-one by 100 lobbyists, according to the *Washington Post*. Dan Mattoon, a lobbyist with Podesta/Mattoon who has taken at least four Ripon trips including the one to London, told the *Post* reporter that Ripon's trips give lobbyists "a chance to visit with some members who you see on the run in Washington."⁶

At least one of the lobbyists who went to Ripon's 2004 conference did more than just tag along. During that conference, which took place in Budapest, Hungary, a speaker at the session on healthcare was Ripon Educational Fund board member Jonathan Spear, according to the Hungarian Embassy's Web site.⁷

Spear became vice president of the biotechnology firm Amgen Inc., based in Thousand Oaks, Calif., in October 2004.⁸ He was on the board of the Ripon Educational Fund in 2003 and 2004, as was David Brown another registered lobbyist for Amgen. A third registered lobbyist for Amgen, Rita Norton, sat on the board of the Ripon Society in 2004. Amgen paid Kessler Business Services at least \$761,000 for lobbying services from 1998 to 2004. [Figure 1]

As of Jan. 19, 2006, Kessler Business Services had not yet filed its lobbying disclosure forms for the first half of 2005, which were due in mid-August. A company representative told Public Citizen the failure was due to an "administrative error" and that it had filed the forms on Jan. 20, 2006, the day Public Citizen contacted them. The office of the Secretary of the Senate has stated that it has no plans to file an enforcement action against the firm.⁹

Before Amgen hired him, Spear was a registered lobbyist for another Kessler client, the Baxter Healthcare Corp. of Deerfield, Ill., for four years. Baxter paid Kessler's firm at least \$310,000 from 2001 to 2004 for lobbying services. [See Appendix A for a complete list of Kessler's lobbying clients]

The Ripon Educational Fund's board is dominated by lobbyists such as Spear and others associated with Kessler's clients. Ten of the 12 total board members in 2003 and 2004 were registered lobbyists including Kessler, who was finance chairman of the fund in 2003, and Kessler Business Service's vice president Billy Lee Evans. The fund's 2004 tax filings do not list Kessler as a member of the board, but do list Evans, maintaining the Kessler Business Services presence on the board.¹⁰

Of the eight other lobbyists on the board in 2003 and 2004, four worked for companies that employed Kessler Business Services to lobby for them. Those four companies, Amgen, Delta Airlines Inc. of Atlanta Ga., Chicago-based Exelon Corp. and Freddie Mac of Mclean, Va., paid Kessler's firm at least \$1,641,000 from 1998 to 2004. [Figure 1]

**Figure 1:
Ripon Educational Fund Board Members, 2003 and 2004**

Board Member	Employer	Link to Kessler Business Services	Amount Lobbyists' Employers Paid to Kessler to Lobby, 1998 to 2004	Year
Mark R. Anderson†	Registered lobbyist for United Airlines	N/A	N/A	2004
Mike Bertman	Registered lobbyist for Diageo North America	N/A	N/A	2003 2004
Ed Bethune	Registered lobbyist employed by Bracewell Guiliani	N/A	N/A	2004
David Brown	Registered lobbyist for Amgen Inc.	Kessler is a registered lobbyist for Amgen Inc.	\$761,000	2003 2004
Mike Dubke	President of Americans for Job Security	Former executive director of the Ripon Society	N/A	2003 2004
Duane S. Duncan	Registered lobbyist for Fannie Mae	N/A	N/A	2004
Billy Lee Evans	Registered lobbyist employed by Kessler Business Services	Vice president of Kessler Business Services	N/A	2003 2004
William Frenzel	The Brookings Institution	Former president of the Ripon Society	N/A	2003
Richard Kessler	Registered lobbyist employed by Kessler Business Services	President of Kessler Business Services	N/A	2003
Susan Molinari	Registered lobbyist for Delta Airlines Inc., Exelon Corp., Freddie Mac	Kessler has registered as a lobbyist for Delta Airlines Inc., Exelon Corp. and Freddie Mac	\$880,000*	2003
Lisa Piccione	Registered lobbyist for Delta Airlines Inc.	Kessler has registered as a lobbyist for Delta Airlines Inc.	\$110,000	2003 2004
Jonathan Spear	Registered lobbyist for Amgen Inc.	Kessler is a registered lobbyist for Amgen Inc.	\$761,000**	2003 2004
Total			\$1,641,000	

Sources: The Ripon Educational Fund's 2003 and 2004 IRS 990 financial disclosure forms and Public Citizen's analysis of lobbying disclosure reports from 1998 to 2004 filed with the Secretary of the Senate (Available at sopr.senate.org).

*To avoid double counting, \$110,000 of this amount is not included in the Figure 1 total as it already is accounted for under Lisa Piccione at Delta Airlines.

** This amount was not included in the Figure 1 total since it was included under David Brown at Amgen Inc.

† While there are several Mark Andersons in the Washington, D.C. area, the only Mark R. Anderson who has made any recent political contributions or performed lobbying is the one identified.

One board member of note is Mike Dubke, the president of Americans for Job Security (AJS), a non-profit group that appears to be almost entirely engaged in assisting Republican candidates win elections, in apparent violation of its 501(c)(6) tax status.

Groups registered under the 501(c)(6) tax designation (reserved for business leagues and business trade associations) are permitted to engage in some efforts to influence the outcomes of elections, but those activities may not constitute the group's primary activity.¹¹ AJS spends the vast majority of its money on media placements, according to a press report and the group's 990 financial disclosure forms.¹² An academic study analyzing the group's television ads found that 100 percent of its airings in 2000 were intended to influence the outcomes of elections.¹³

In a study published in 2004, Public Citizen found that the group had been active in at least 31 federal races since 2000, including both presidential contests. In each instance, the group either praised a Republican candidate or criticized a Democratic candidate.¹⁴

By registering as a 501(c)(6) non-profit, rather than under Section 527 (the section of the tax code reserved for groups that are primarily involved in influencing elections), AJS is able to keep its donor list secret, which the group has made a point of doing.

The Ripon Educational Fund, like most 501(c)(3)s, keeps its donors secret. However, its 2001 990 financial disclosure form shows it received slightly more than \$1 million from 61 donors, along with \$9,000 in other revenue.¹⁵ (The 2001 990 is the only one that lists the number of donors.)

Ripon Fund President Terri Pazirandeh declined to release to Public Citizen during a May 2005 telephone conversation, the names of the lobbyists who accompanied the lawmakers on the trips, the topics covered during the conferences or a list of speakers.¹⁶

Of the \$6 million in income the fund received between 2000 and 2004, it spent 77 percent of it, or \$4.6 million, taking lawmakers on trips.¹⁷

The Ripon Society: A Partisan Smokescreen

Kessler has found additional ways to launder travel money from lobbyists against congressional rules and help his clients get face time with lawmakers. He is currently president of the Ripon Society, which purports to be a moderate Republican think tank. It is an educational non-profit group that falls under the Section 501(c)(4) of the tax code; contributions to it are not tax deductible.

At first glance, the Ripon Society does seem to advocate mainstream Republicanism. The March/April 2005 edition of its magazine, *The Ripon Forum*, features an interview with former House Majority Leader Tom DeLay (R-Texas) and 10 opinion pieces by Republican lawmakers, including Rep. Michael Oxley (R-Ohio), on topics ranging from Social Security to minority homeownership. It also produces television ads that support mainstream Republican policies.

Evidence suggests, however, that its true purpose is to bring lobbyists and lawmakers together.

According to its 2004 990 financial disclosure form, all but \$15,000 of its \$1.45 million in revenue came from charging admission to dozens of special events for its members.¹⁸ Many of these were dinners and breakfasts featuring Republican lawmakers such as Reps. Deborah Pryce (R-Ohio), Jim McCrery (R-La.), and House Majority Whip Roy Blunt (R-Mo.) as speakers.¹⁹

Pamela Bailey, a former member of the Ripon Society, told Public Citizen that organizations and lobbyists are charged an annual fee that includes admission to the breakfasts and dinners. “There is a sliding membership fee based on the size of the company or organization,” Bailey said.²⁰

Bailey says the organization’s primary purpose is to help its lobbyist members spend time with the lawmakers who make decisions affecting their clients. Bailey, who was president of the Advanced Medical Technology Association until April 2005, said her membership was as a representative of the association she headed, not as an individual who supported the Ripon Society’s political agenda. She points out her association also belonged to the Democratic Leadership Council. “We belonged to both Democratic and Republican organizations,” Bailey told Public Citizen. “It was important to our members that we have access to both Democrats and Republicans. That is how the political system in Washington works.”

Bailey was unaware she was listed as a member of the Ripon Society’s board on the group’s 2004 990 financial disclosure form until informed by Public Citizen. She said she understood her membership on the board to be honorary and asked the group to file an amended return removing her name from the board. “I went to one board meeting 18 months ago,” she said.²¹

Ripon has since filed an amended report showing that she was not a member of the board.²²

Bailey is now president of the Cosmetic, Toiletry and Fragrance Association.

Other Ripon Society members also claim their motivation for joining the society is access to lawmakers. For instance, in a 2004 electronic newsletter, the Portland Cement Association announced it had joined the Ripon Society and the Democratic Leadership Council as a way to

gain access to members of Congress. “Numerous events are held throughout the year to further the Society’s agenda and provide an opportunity for members to meet with members of Congress,” the newsletter said.²³

The Ripon Society also takes lawmakers on trips. It spent more than \$32,000 to take 10 lawmakers to Key Biscayne, Fla., for a conference in January 2005. It also paid \$1,600 to send Rep. Mark Foley (R-Fla.) to Chicago in August 2004 and \$8,900 to send Rep. Nancy Johnson (R-Conn.) to San Francisco in 2002.²⁴ [For a complete list of Kessler-connected travel, see Appendix B]

Elvis Oxley, the group’s executive director at the time, told a *Roll Call* reporter the purpose of the Florida trip was not to give its lobbyist members a chance to schmooze with lawmakers but to discuss policy. “Sen. [Chuck] Grassley (R-Iowa), who joined us down there, was sitting in the front row of the audience after his commitment was completed,” Oxley said. “He sat there and took notes on No Child Left Behind.”²⁵

On the society’s Web site, Oxley was more open about the purpose of the trip. “The interaction between our corporate members, members of Congress, and our policy experts was truly enthralling,” he said.²⁶

The makeup of the Ripon Society’s 2004 board of directors also undermines its claim that it is a think tank. Instead of being populated by Republican activists and policy analysts, all seven of the directors are lobbyists. Six of the companies that employ the board members are Kessler’s clients, according to his firm’s latest disclosure forms: the Washington-based Advanced Medical Technology Association and Grocery Manufacturers of America, the New York-based Altria Group Inc. and Pfizer Inc., Amgen Inc. and Freddie Mac. Together, the six companies paid Kessler \$2.5 million to lobby from 1998 to 2004. [Figure 2]

Ripon Society and Ripon Educational Fund board members have also made generous contributions to the campaign funds of the lawmakers who have gone on Ripon group trips. Together, the board members of both groups contributed \$236,000 from 1997 to mid-2005 to the 41 lawmakers who have gone on the two groups’ trips. The 11 PACs of the corporations that the two groups’ board members have lobbied for gave more than \$2 million during the same period to the same set of lawmakers. [Appendix B]

Kessler has staffed the society with his sister, Robin Kessler, who works as its corporate finance director and Elvis Oxley, who resigned as executive director in June 2005.²⁷ Elvis Oxley is the son of Rep. Michael G. Oxley (R-Ohio), who has been among the Ripon groups’ most frequent travelers, having taken five trips; and Oxley reported receiving more than \$51,000 in free travel from the Ripon Educational Fund from 2000 to mid-2005.²⁸ He has also received more than \$30,000 in campaign contributions from 1997 to mid-2005 from the employers of the Ripon groups’ board members. [Appendix B]

Figure 2
Ripon Society Board Members in 2004

Board Member	Employer	Link to Kessler Business Services	Amount Lobbyists' Employers Paid Kessler to Lobby, 1998-2004
Pamela Bailey*	Registered lobbyist for Advanced Medical Technology Association	Kessler has registered as a lobbyist for Advanced Medical Technology Association	\$90,000
Catherine Bennett	Registered lobbyist for Pfizer Inc.	Kessler is a registered lobbyist for client Pfizer Inc.	\$530,000
James Boland	Registered lobbyist for Freddie Mac	Kessler has registered as a lobbyist for Freddie Mac	\$110,000
Brenda Day	Registered lobbyist for Daimler Chrysler Corp.	N/A	N/A
Rita Norton**	Registered lobbyist for Amgen Inc.	Kessler is a registered lobbyist for Amgen Inc.	\$761,000
Mary Sophos	Registered lobbyist for Grocery Manufacturers of America	Kessler has registered as a lobbyist for Grocery Manufacturers of America	\$280,000
Greg Scott	Registered lobbyist for Altria Group Inc.	Kessler is a registered lobbyist for Altria Group Inc.	\$758,000
Total			\$2,529,000

Sources: The Ripon Society's 2004 IRS 990 financial disclosure form and Public Citizen analysis of lobbying disclosure reports from 1998 to 2004 filed with the Secretary of the Senate (Available at sopr.senate.org).

*Bailey was listed as a board member on the Ripon Society's 2004 IRS 990 financial disclosure form but objected after Public Citizen brought it to her attention. The Ripon Society removed her from the list of directors on the amended 990 form that it filed in May 2005.

**Norton retired from Amgen Inc. in July 2004.

Century Business Services: Kessler's Parent Company Pretense

Lobbying firms are typically independently owned or part of law firms or public relations shops. Kessler Business Services, however, is owned by a financial services corporation that sells accounting and insurance services to small businesses. Because ethics rules allow lawmakers to accept free trips from corporations, being owned by Cleveland-based Century Business Services Inc. gives Kessler another convenient loophole to pay for lawmakers' travels. Century Business Services acquired Kessler's firm in 1999.²⁹

For instance, six days before the Ripon Educational Fund's 2003 conference in London, Kessler spent \$36,000 to take five lawmakers to Shannon, Ireland. He accompanied Sen. Gordon Smith (R-Ore.), former Sen. Don Nickles (R-Okla.) and Reps. Howard Coble (R-N.C.), E. Clay Shaw Jr. (R-Fla.), and Harold Rogers (R-Ky.) and his wife, Cynthia, on a five-day trade symposium in Shannon. All five lawmakers then proceeded to London where the Ripon Educational Fund paid another \$36,000 for their expenses at its London conference.³⁰

The lawmakers reported on their travel disclosure forms that Kessler Business Services paid for the Ireland trip. Twenty-one months later, when reporters noticed a lobbying firm had paid for the lawmakers' travel in violation of the ethics rules; the five lawmakers amended their disclosure forms to say Century Business Services actually paid for the trip.

Rep. Shaw's spokesman told the *St. Petersburg Times* that Shaw's office incorrectly listed Kessler as the sponsor because the invitation was written on Kessler Business Services' letterhead.³¹ According to the rules, companies can pay for the travel of lawmakers and their staff if the company has a "direct and immediate relationship" with the "event or location" of the trip.³²

The explanation that Century paid for the Scotland trip seems suspect, but the company did not respond to repeated calls from Public Citizen asking how it was involved in the travel. Kessler also did not return calls or respond to an email inquiring about Century's role in the trip.³³

It appears unlikely that Kessler Business Services, which is not an in-house lobbying arm for Century, might have inadvertently used its own letterhead when sending an invitation to lawmakers on behalf of its parent company. Founded in 1987, Kessler Business Services is a well-established Washington lobbying firm that has represented at least 36 corporations and organizations. [Appendix A] Century has never paid Kessler or any other lobbying firm enough to trigger the requirement that lobbying expenditures of more than \$6,000 in a six-month period be reported.³⁴ Moreover, Century's filings with the Securities and Exchange Commission do not describe its financial relationship with Kessler Business Services, so it is unclear if Kessler is a wholly owned subsidiary of Century or how much influence Century exerts over Kessler's finances and management.³⁵

Kessler's Lobbying Clients: The Corporate Client Cover

Century is not the only company associated with Kessler that pays for lawmakers' trips. Several of the associations and corporations Kessler lobbies for also have given lawmakers rides on their corporate jets or paid for other travel, which raises questions as to whether Kessler arranged for the free rides as part of his lobbying efforts.

For instance, Baxter Healthcare, which paid Kessler \$310,000 to represent it from 1998 to 2004, paid \$3,000 to fly Rep. Dave Camp (R-Mich.) and his family to Chicago in August 2004, according to *Roll Call*. While there, he and his family stayed in a luxury hotel and attended a baseball game at Wrigley Field.³⁶ The Ripon Society, of which Kessler is president, planned and sponsored the trip.

A Baxter spokeswoman told *Roll Call* that the company flew lawmakers on its corporate planes only when the lawmakers requested it. It has now changed its policy and will not be offering free rides to lawmakers in the future, she said.

All told, 11 of Kessler's lobbying clients gave free travel to lawmakers between 2000 and 2004. They paid for 96 trips taken by members of Congress, which the lawmakers reported to be worth more than \$273,000. The 11 clients paid Kessler a total of \$3.7 million for lobbying from 1998 to 2004. [Figure 3]

The most generous companies are also Kessler's biggest clients. For instance, Burlington Northern Santa Fe Corp. of Fort Worth, Texas, paid Kessler nearly \$1.2 million from 1998 to 2004 and spent nearly \$63,000 taking lawmakers on free trips from 2000 to mid-2005. Another long-term client of Kessler's, Pfizer Inc., paid him \$530,000 in lobbying fees from 1998 to 2004 and provided lawmakers with more than \$22,000 in free trips from 2000 to mid-2005.

Figure 3
Lawmaker Travel Paid for by Kessler's Lobbying Clients

Client	Total Number of Lawmaker Trips 2000-2004	Total Cost Reported by Lawmakers 2000-2004	Client With a Registered Lobbyist on a Ripon Group Board	Amount Paid to Kessler Business Services 1998-2004
Advanced Medical Technology Association/Health Industry Manufacturers Association	2	\$4,485	Yes	\$90,000
Alliance of Automobile Manufacturers Inc.	9	\$12,409	No	\$80,000
Altria Group Inc. (formerly the Phillip Morris Companies)	2	\$578	Yes	\$758,000
Burlington Northern Santa Fe Corp.	19	\$62,815	No	\$1,150,000
Delta Airlines Inc.	2	\$319	Yes	\$110,000
Grocery Manufacturers of America	4	\$8,012	Yes	\$280,000
National Association of Securities Dealers	36	\$144,535	No	\$300,000
Pfizer Inc.	11	\$22,369	Yes	\$530,000
Sallie Mae	4	\$3,972	No	\$280,000
SmithKline	5	\$3,226	No	\$120,000
Wine & Spirits Wholesalers of America	2	\$10,765	No	\$20,000
Total	96	\$273,485		\$3,718,000

Sources: Public Citizen analysis of the database of privately paid travel taken by members of Congress, located on the PoliticalMoneyLine Web site (viewed on June 27, 2005); and Public Citizen analysis of lobbying disclosure reports from 1998 to 2004 filed with the Secretary of the Senate (Available at sopr.senate.org).

Solution: Congress Should Prohibit Privately Funded Travel

In many –if not most – cases, congressional travel junkets are in reality forums for lobbying. Lobbyists, through their corporate clients, finance travel for members of Congress and their staff to get them off Capitol Hill, where lobbyist gift limits and disclosure rules no longer apply. Traveling with members of Congress and their staffs is such an effective way for lobbyists to get lawmakers' undivided attention that lobbyists routinely go to great lengths to get around the rules that prohibit them from paying for these trips.

The elaborate ruses Kessler and other lobbyists use to launder travel money are arguably legal under the current ethics rules. The point of the rule banning lobbyists from paying for lawmaker's travel, however, is to avoid both the fact and the appearance that lawmakers are accepting expensive gifts, including travel to desirable locales, from the hired guns of special interests. Kessler by using non-profits, his corporate clients and his parent company, Century Business Services, runs a full service travel agency for lawmakers and still stays within the ethics rules.

How to prevent this kind of abuse is a matter of debate. Former House Majority Leader Tom DeLay, who is under investigation by the House Ethics Committee for taking trips paid for by lobbyists, says the rules are too complicated and need to be clarified.³⁷ Others are calling for tougher penalties if the rules are violated. For instance, a bill (H.R. 2412) recently introduced by Rep. Marty Meehan (D-Mass.) would increase fines to as much as \$500,000 for members who falsely certify that free trips were not paid for by a registered lobbyist.

Neither simplifying the rules nor increasing fines would prevent lobbyists and lobbying firms from soliciting and arranging congressional junkets. Lobbyists, such as Jack Abramoff, could continue to pay for these trips through their corporate clients or no longer formally register as a lobbyist since there is virtually no enforcement of the requirement. Lobbying firms, such as Kessler's, could continue setting up non-profit organizations and charging travel expenses to their parent companies.

The solution is much simpler: Congress should ban all privately paid travel. If a trip is necessary or offers important educational opportunities to lawmakers and their staffs, then lawmakers should pay for it out of their travel budgets.

Between 2000 and 2004, lawmakers accepted \$17.6 million in free trips, slightly more than \$3 million a year.³⁸ That comes to less than \$6,000 a year for each member of the House and the Senate, a price that exceeds the annual vacation budgets of most Americans. These congressional junkets, if necessary at all, should be paid for with public funds rather than with special interest dollars. It is the only way to lessen the stench of cronyism and corruption that now permeates congressional travel.

Appendix A: Kessler Business Services' Lobbying Clients, 1998 to 2004

Clients That Spent at Least \$10,000 Since 1998	Amount	Duration
Abbott Laboratories	\$252,250	2003-2004
Advanced Medical Technology Association	\$90,000	2002-2003
Alliance of Automobile Manufacturers, Inc.	\$80,000	2000-2000
Altria Group Inc.	\$758,000	2001-2004
Amgen Inc.	\$761,000	1998-2004
Astar Air Cargo	\$650,000	2003-2004
Baxter Healthcare Corp.	\$310,000	2001-2004
Bristol-Myers Squibb Co.	\$361,500	2002-2004
Burlington Northern Santa Fe Corp.	\$1,150,000	1998-2004
Delta Air Lines Inc.*	\$110,000	2001-2002
Dunn-Edwards	\$1,740,000	1998-2001
Exelon Corp.	\$660,000	1999-2004
Federated Investors of Pittsburgh	\$20,000	1999-2000
Federation of American Health Systems	\$62,000	1998-1998
Florida Power & Light Co.	\$181,000	2003-2004
Florida Progress Corp.	\$140,000	1999-2001
Freddie Mac-Federal Home Loan Mortgage Corporation	\$110,000	2001-2002
Future for Puerto Rico	\$52,000	2000-2001
Grocery Manufacturers of America	\$280,000	1998-2002
Guest & Associates	\$120,000	1998
MAASCO	\$75,000	2003
National Association of Securities Dealers	\$300,000	2001
New Skies Satellites N.V.	\$75,000	2001
Novartis AG	\$190,000	1998-2001
Pasteur Merieux Connaught	\$160,000	1998-2000
Pfizer Inc.	\$530,000	1998-2004
Planet Electric	\$40,000	2000
Polycystic Kidney Diseases Foundation	\$40,000	1999
Rising Tide	\$40,000	1999
Rock Island Tie & Timber	\$60,000	2002
Sallie Mae Inc.	\$280,000	1999-2002
SmithKline	\$120,000	1998-2000
Thomas Advisors (Formerly Rheinbraun Water Energy)	\$121,000	2002-2004
Vivus	\$100,000	1998
Wheat Government Relations	\$455,000	2002-2004
Wine & Spirits Wholesalers of America	\$20,000	1998
Total	\$10,493,750	

Source: Public Citizen analysis of lobbying disclosure reports from 1998 to 2004 filed with the Secretary of the Senate (Available at sopr.senate.org).

*Kessler has continued to file disclosure reports through 2004 on Delta even though each report says there has been no lobbying activity.

Appendix B

Congressional Recipients of Trips From the Ripon Groups and Kessler's Lobbying Clients and Parent Company

State	Lawmaker	Total Number of Trips	Total Cost of All Trips	Ripon Educational Fund Trips	Ripon Society Trips	Trips Paid for by Century Business Services (Kessler's Parent)	Trips Paid for by Kessler's Lobbying Clients	Campaign Contributions from the Ripon Groups' Board Members 1997-Mid 2005	Campaign Contributions from Corporate PACs Affiliated with the Ripon Groups' Board Members 1997 - Mid-2005
Alabama	Rep. Spencer Bachus (R-Ala.)	3	\$13,179	\$9,023 for a 2004 trip to Budapest, Hungary.	\$2,378 for a 2005 trip to Key Biscayne, Fla.		\$1,778 for a 2004 trip to Santa Fe, N.M. and Solona Beach, Calif. from Burlington Northern Santa Fe.	\$3,500	\$12,000
California	Rep. Wally Herger (R-Calif.)	2	\$24,336	\$21,336 for a 2001 trip to Edinburgh, Scotland and a 2000 trip to Rome.					\$32,000
California	Rep. William Thomas (R-Calif.)	3	\$27,251	\$24,519 for a 2002 trip to Thousand Oaks, Calif. and a 2001 trip to Edinburgh, Scotland.			\$2,732 for a 2000 trip to St. Louis, Mo. from the Advanced Medical Technology Association and Health Industry Manufacturers Association.	\$6,200	\$109,149
Connecticut	Rep. Nancy Johnson (R-Conn.)	4	\$37,440	\$24,324 for a 2001 trip to Edinburgh, Scotland and a 2000 trip to Rome.	\$13,116 for a 2005 trip to Key Biscayne, Fla. and a 2002 trip to San Francisco.			\$9,500	\$76,999
Delaware	Rep. Michael Castle (R-Del.)	1	\$9,050	\$9,050 for a 2003 trip to Rome.				\$2,500	\$17,600
Florida	Rep. Ander Crenshaw (R-Fla.)	1	\$11,018	\$11,018 for a 2003 trip to London					\$1,000

State	Lawmaker	Total Number of Trips	Total Cost of All Trips	Ripon Educational Fund Trips	Ripon Society Trips	Trips Paid for by Century Business Services (Kessler's Parent)	Trips Paid for by Kessler's Lobbying Clients	Campaign Contributions from the Ripon Groups' Board Members 1997-Mid 2005	Campaign Contributions from Corporate PACs Affiliated with the Ripon Groups' Board Members 1997 - Mid-2005
Florida	Rep. Mark Foley (R-Fla.)	5	\$16,507	\$13,193 for a 2002 trip to San Francisco and Los Angeles, a 2001 trip to Edinburgh, Scotland and a 2000 trip to Rome.	\$3,314 for a 2005 trip to Miami and for a 2004 trip to Chicago.			\$2,500	\$52,500
Florida	E. Clay Shaw (R-Fla.)	4	\$21,929	\$16,464 for a 2003 trip to London, 2001 trip to Edinburgh, Scotland and a 2000 trip to Rome.		\$5,945 for a 2003 trip to Ireland.		\$5,750	\$58,000
Georgia	Rep. John Linder (R-Ga.)	4	\$40,948	\$38,294 for a 2004 trip to Budapest, Hungary, a 2003 trip to London and a 2002 trip to Vienna.	\$2,654 for a 2005 trip to Key Biscayne, Fla.			\$500	\$41,500
Illinois	Rep. Philip Crane (R-Ill.)	5	\$63,583	\$59,099 for a 2004 trip to Budapest, Hungary, a 2003 trip to London, a 2001 trip to Edinburgh, Scotland and a 2000 trip to Rome.			\$4,484 for a 2002 trip to Miami from the National Association of Securities Dealers.		\$96,353
Iowa	Sen. Charles Grassley (R-Iowa)	1	\$4,314		\$4,314 for a 2005 trip to Key Biscayne, Fla.			\$5,700	\$49,500
Kansas	Sen. Pat Roberts (R-Kan.)	2	\$32,282	\$32,282 for a 2003 trip to London and a 2000 trip to Rome.				\$1,000	\$43,000

State	Lawmaker	Total Number of Trips	Total Cost of All Trips	Ripon Educational Fund Trips	Ripon Society Trips	Trips Paid for by Century Business Services (Kessler's Parent)	Trips Paid for by Kessler's Lobbying Clients	Campaign Contributions from the Ripon Groups' Board Members 1997-Mid 2005	Campaign Contributions from Corporate PACs Affiliated with the Ripon Groups' Board Members 1997 - Mid-2005
Kentucky	Rep. Ernie Fletcher (R-Ky.)	2	\$17,540	\$17,540 for a 2002 trip to San Francisco and Los Angeles and a 2001 trip to Edinburgh, Scotland.				\$2,250	\$28,050
Kentucky	Rep. Harold Rogers (R-Ky.)	3	\$19,555	\$5,537 for a 2003 trip to London.		\$10,281 for a 2003 trip to Ireland.	\$3,737 for a 2001 trip to New York from Burlington Northern Santa Fe.	\$2,000	\$39,500
Kentucky	Edward Whitfield (R-Ky.)	4	\$34,465	\$34,465 for a 2004 trip to Budapest, Hungary, a 2002 trip to Los Angeles, a 2001 trip to Edinburgh, Scotland and a 2000 trip to Rome.				\$4,750	\$73,500
Louisiana	Rep. James McCreery (R-La.)	1	\$20,809	\$20,809 for a 2003 trip to London.				\$33,500	\$144,250
Michigan	Rep. David Camp (R-Mich.)	1	\$15,623	\$15,623 for a 2001 trip to London.				\$500	\$70,300
Michigan	Rep. Candice Miller (R-Mich.)	1	\$4,578		\$4,578 for a 2005 trip to Key Biscayne, Fla.				\$26,500
Michigan	Rep. Frederick Upton (R-Mich.)	2	\$9,050	\$9,050 for a 2000 trip to Rome.			\$738 for a 2004 trip to Detroit from the Alliance of Automobile Manufacturers.	\$200	\$55,750
New Jersey	Rep. Michael Ferguson (R-N.J.)	2	\$9,431		\$5,778 for a 2005 trip to Miami.		\$3,653 for a 2003 trip to Key Biscayne Fla. from the National Association of Securities Dealers	\$2,950	\$51,500

State	Lawmaker	Total Number of Trips	Total Cost of All Trips	Ripon Educational Fund Trips	Ripon Society Trips	Trips Paid for by Century Business Services (Kessler's Parent)	Trips Paid for by Kessler's Lobbying Clients	Campaign Contributions from the Ripon Groups' Board Members 1997-Mid 2005	Campaign Contributions from Corporate PACs Affiliated with the Ripon Groups' Board Members 1997 - Mid-2005
New York	Rep. Sue Kelly (R-N.Y.)	1	\$18,650	\$18,650 for a 2003 trip to London.				\$2,250	\$13,000
New York	Rep. Tom Reynolds (R-N.Y.)	3	\$27,844	\$27,844 for a 2003 trip to London, a 2001 trip to Edinburgh, Scotland and a 2000 trip to Rome.				\$13,500	\$66,500
North Carolina	Rep. Howard Coble (R-N.C.)	3	\$11,699	\$9,376 for a 2003 trip to London and a 2001 trip to Edinburgh, Scotland.		\$2,323 for a 2003 trip to Ireland			\$44,250
Ohio	Rep. John Boehner (R-Ohio)	4	\$17,904	\$13,920 for a 2001 trip to Edinburgh, Scotland and a 2000 trip to Rome.			\$3,984 for a 2002 trip to White Sulphur Springs, W.V., from the Grocery Manufacturers of America and a 2003 trip to West Palm Beach, Fla. from Sallie Mae.	\$42,005	\$75,800
Ohio	Rep. Dave Hobson (R-Ohio)	2	\$22,064	\$19,527 for a 2001 trip to Edinburgh, Scotland.	\$2,537 for a 2005 trip to Key Biscayne, Fla.			\$4,094	\$37,000
Ohio	Rep. Robert Ney (R-Ohio)	1	\$5,400	\$5,400 for a 2000 trip to Rome.				\$9,500	\$18,000

State	Lawmaker	Total Number of Trips	Total Cost of All Trips	Ripon Educational Fund Trips	Ripon Society Trips	Trips Paid for by Century Business Services (Kessler's Parent)	Trips Paid for by Kessler's Lobbying Clients	Campaign Contributions from the Ripon Groups' Board Members 1997-Mid 2005	Campaign Contributions from Corporate PACs Affiliated with the Ripon Groups' Board Members 1997 - Mid-2005
Ohio	Rep. Michael Oxley (R-Ohio)	5	\$51,629	\$51,629 for a 2004 trip to Budapest, Hungary, a 2003 trip to London, a 2001 trip to Edinburgh, Scotland, a 2000 trip to Venice and a 2000 trip to Rome.				\$30,500	\$117,500
Ohio	Rep. Deborah Pryce (R-Ohio)	2	\$15,283	\$9,050 for a 2000 trip to Rome.			\$6,233 for a 2001 trip to Grand Cayman Island, British West Indies from the Wine & Spirits Wholesalers.	\$26,500	\$110,500
Oklahoma	Sen. Donald Nickles (R-Okla.)	5	\$47,102	\$34,595 for a 2003 trip to London, a 2001 trip to Edinburgh, Scotland and a 2000 trip to Rome.		\$7,975 for a 2003 trip to Ireland.	\$4,532 for a 2000 trip to St. Thomas, V.I. from the Wine & Spirits Wholesalers.	\$5,500	\$80,000
Oregon	Sen. Gordon Smith (R-Ore.)	3	\$23,648	\$11,716 for a 2003 trip to London.	\$2,100 for a 2005 trip to Miami.	\$9,832 for a 2003 trip to Ireland.		\$500	\$59,000
Pennsylvania	Rep. Phillip English (R-Pa.)	1	\$8,336	\$8,336 for a 2001 trip to Edinburgh, Scotland.				\$250	\$62,000
Pennsylvania	Rep. James Greenwood (R-Pa.)	4	\$43,984	\$37,041 for a 2003 trip to London, a 2001 trip to Edinburgh, Scotland and a 2000 trip to Rome.			\$6,943 for a 2003 trip to Miami from the National Association of Securities Dealers	\$7,400	

State	Lawmaker	Total Number of Trips	Total Cost of All Trips	Ripon Educational Fund Trips	Ripon Society Trips	Trips Paid for by Century Business Services (Kessler's Parent)	Trips Paid for by Kessler's Lobbying Clients	Campaign Contributions from the Ripon Groups' Board Members 1997-Mid 2005	Campaign Contributions from Corporate PACs Affiliated with the Ripon Groups' Board Members 1997 - Mid-2005
Pennsylvania	Rep. Melissa Hart (R-Pa.)	2	\$15,865	\$15,865 for a 2004 trip to Budapest, Hungary and 2003 trip to London.				\$500	\$39,750
South Carolina	Rep. James Barrett (R-S.C.)	1	\$9,217	\$9,217 for a 2004 trip to Budapest, Hungary.					\$8,000
Tennessee	Rep. John Duncan (R-Tenn.)	2	\$12,487	\$8,750 for a 2000 trip to Rome.			\$3,737 for a 2001 trip to Cody, Wy. from Burlington Northern Santa Fe.		\$13,000
Tennessee	Rep. Bart Gordon (D-Tenn.)	1	\$18,683	\$18,683 for a 2003 trip to London.				\$2,750	\$27,000
Texas	Rep. Kay Granger (R-Texas)	4	\$12,613	\$5,400 for a 2000 trip to London.			\$7,213 for a 2005 trip to Orlando, Fla. and Scottsdale, Ariz. and a 2000 trip to Palm Springs, Calif from Burlington Northern Santa Fe.	\$3,877	\$9,500
Utah	Sen. Orrin Hatch (R-Utah)	3	\$4,230		\$2,582 for a January 2005 trip to Key Biscayne, Fla.		\$1,648 for a 2004 trip to Houston from SmithKline and for a 2002 trip to New York from Pfizer.	\$3,500	\$69,500
Virginia	Rep. Frederick Boucher (D-Va.)	2	\$7,405	\$7,405 for a 2003 trip to London and a 2001 trip to Edinburgh, Scotland.					\$86,500
Virginia	Rep. Bob Goodlatte (R-Va.)	1	\$15,242	\$15,242 for a 2004 trip to Budapest, Hungary.					\$24,250

State	Lawmaker	Total Number of Trips	Total Cost of All Trips	Ripon Educational Fund Trips	Ripon Society Trips	Trips Paid for by Century Business Services (Kessler's Parent)	Trips Paid for by Kessler's Lobbying Clients	Campaign Contributions from the Ripon Groups' Board Members 1997-Mid 2005	Campaign Contributions from Corporate PACs Affiliated with the Ripon Groups' Board Members 1997 - Mid-2005
Washington	Rep. Jennifer Dunn (R-Wash.)	2	\$7,252	\$6,272 for a 2003 trip to London.			\$980 for a 2001 trip to White Sulphur Springs, W.V. from the Grocery Manufacturers of America	\$250	\$28,000
Total		103	\$829,425	\$698,544	\$43,351	\$36,356	\$51,654*	\$236,176	\$2,069,001

Sources: Public Citizen analysis of the database of privately paid travel taken by members of Congress located on the PoliticalMoneyLine Web site (Available at www.politicalmoneyline.com/cgi-win/x_PrivateSponsor.exe?DoFn=1135330. Viewed on June 27, 2005), and Public Citizen analysis of Federal Election Commission data.

*This number is the amount lawmakers who went on the Ripon Group trips reported receiving in free travel from Kessler's clients for 17 trips taken since 2000. Kessler's clients also paid for an additional 79 trips taken by other lawmakers during the same period. [See Figure 3]

Endnotes

-
- ¹PoliticalMoneyLine Web site. (Available at www.politicalmoneyline.com/cgi-win/x_PrivateSponsor.exe?DoFn=1135330. Viewed on June 27, 2005.)
- ²PoliticalMoneyLine Web site. (Available at www.politicalmoneyline.com/cgi-win/x_PrivateSponsor.exe?DoFn=1135330. Viewed on June 27, 2005.)
- ³Public Citizen analysis of the Ripon Educational Fund's IRS 990 Financial Disclosure forms for 2000, 2001, 2002 and 2003.
- ⁴Century Business Services Web site. (Available at www.cbiz.com/kessler/page.asp?pid=617. Viewed on June 27, 2005.)
- ⁵The Ripon Educational Fund's 2003 IRS 990 Financial Disclosure form.
- ⁶Juliet Eilperin, "Lawmakers and Lobbyists Mingle on Trip to London: Legislators Travel Free, Thanks to Ripon Society," *Washington Post*, Aug. 29, 2003.
- ⁷Embassy of Hungary's Web site. (Available at www.hungaryemb.org/TransAtlantic%20Conference/TransAtlantic%20Conference.htm. Viewed on June 27, 2005.)
- ⁸"Appointments and Advancements," *Bioworld Today*, Oct. 13, 2004.
- ⁹Phone interviews with staff at Kessler Business Services and the Secretary of the Senate by Public Citizen researcher Conor Kenny, Jan. 20, 2006.
- ¹⁰The Ripon Educational Fund's 2003 IRS 990 Financial Disclosure form.
- ¹¹John Francis Reilly and Barbara A. Braig Allen, "Political Campaign and Lobbying Activities of IRS 501(c)(4), (c)(5), and (c)(6) Organizations," IRS Exempt Organizations-Technical Instruction Program for FY 2003, p. L-3.
- ¹²Nicholas Confessore, "Bush's Secret Stash," *Washington Monthly*, May 2004 and AJS 990 forms, 2001 and 2002. (Forms primarily cover calendar years 2002 and 2003.)
- ¹³Nicholas Confessore, "Bush's Secret Stash," *Washington Monthly*, May 2004.
- ¹⁴"The New Stealth PACs: Tracking 501(c) Groups Active In Elections," Public Citizen, September 2004. (Available online with accompanying database at www.stealthpacs.org.)
- ¹⁵The Ripon Educational Fund's 2001 IRS 990 Financial Disclosure form.
- ¹⁶Terri Pazirandeh, president of the Ripon Educational Fund. Telephone conversation with Public Citizen Senior Researcher Karen Robb in May 2005.
- ¹⁷Public Citizen analysis of the Ripon Educational Fund's IRS 990 Disclosure forms for 2000, 2001, 2002 and 2003.
- ¹⁸The Ripon Society's 2004 IRS 990 Financial Disclosure form.
- ¹⁹The Ripon Society Web site. (Available at riponsoc.org/calendar.shtml. Viewed on June 29, 2005.)
- ²⁰Pamela Bailey, president of the Cosmetic, Toiletry and Fragrance Association. Interview with Public Citizen Senior Researcher Karen Robb on June 7, 2005.
- ²¹Pamela Bailey, president of the Cosmetic, Toiletry and Fragrance Association. Interview with Public Citizen Senior Researcher Karen Robb on June 7, 2005.
- ²²Public Citizen analysis of the Ripon Society's amended 2004 IRS 990 Financial Disclosure form.
- ²³May 28, 2004 Newsletter on the association's Web site. (Available at www.cement.org/exec/05-28-04.htm. Viewed on June 23, 2005.)
- ²⁴PoliticalMoneyLine Web site (Available at www.politicalmoneyline.com/cgi-win/x_PrivateSponsor.exe?DoFn=1135330. Viewed on June 27, 2005.)
- ²⁵Kate Ackley, "Destination Unknown: What Will the Congressional Travel Controversy Mean for K Street?" *Roll Call*, April 25, 2005.
- ²⁶Ripon Society Web Site. (Available at www.riponsoc.org/cgi-data/news/files/27.shtml. Viewed June 29, 2005.)
- ²⁷Kate Ackley, "What Next for Ripon? Moderate GOP Group Copes with Leadership Change, Scrutiny," *Roll Call*, June 13, 2005.
- ²⁸Political MoneyLine Web site. (Available at www.politicalmoneyline.com/cgi-win/x_PrivateMember.exe?DoFn=H2OH04032. Viewed on June 27, 2005.)
- ²⁹Marc Kaufman, "Lawmakers Change Report on Ireland Trip," *Washington Post*, May 21, 2005.
- ³⁰PoliticalMoneyLine Web site. (Available at www.politicalmoneyline.com/cgi-win/x_PrivateSponsor.exe?DoFn=1135330. Viewed on June 27, 2005.)
- ³¹Wes Allison, "Do Travel Rules Cloak Lobbyists' Influence?" *St. Petersburg Times*, May 8, 2005.
- ³²"Rules of the U.S. House of Representatives on Gifts and Travel," Page 42.

³³ Public Citizen Senior Researcher Karen Robb left a message for Mr. Kessler at his office with Jonathan Price on July 18, 2005. Mr. Price would not give her Mr. Kessler's e-mail address so she sent him an e-mail through the e-mail form on Kessler Business Services' Web site. (Available at www.cbiz.com/kessler/contactus.asp?pid=570. Viewed July 18, 2005). She also left a message with Century Business Services' public affairs manager, Laurie Norvikus on July 18, 2005.

³⁴ Public Citizen analysis of lobbying disclosure reports from 1998 to 2004 filed with the Secretary of the Senate and the Clerk of the House.

³⁵ Public Citizen analysis of Century's proxy statements and quarterly and annual reports filed with the Securities and Exchange Commission from 1998 to May 2005. (Available at www.sec.gov. Viewed May 2005.)

³⁶ Kate Ackley, "Camp, Foley Reimburse Ripon for Expenses," *Roll Call*, May 31, 2005.

³⁷ Mike Allen, "House GOP Leaders Say they Will Consider Tighter Ethics Rules," *Washington Post*, May 5, 2005.

³⁸ PoliticalMoneyLine Web site. (Available at www.politicalmoneyline.com/cgi-win/x_PrivateSponsor.exe?DoFn=1135330. Viewed on June 27, 2005.)