



## MEMORANDUM

**To:** All Staff  
**From:** Rick Davis  
**CC:**  
**Date:** May 15, 2008  
**Re:** McCain Campaign Conflict Policy

---

### MCCAIN CAMPAIGN POLICY

The Campaign policy with regard to lobbying by individuals affiliated with the Campaign is as follows:

- 1.) No person working for the Campaign may be a registered lobbyist or foreign agent, or receive compensation for any such activity.
- 2.) Part-time volunteers for the Campaign must **disclose** to the Campaign any status as registered lobbyists or foreign agents. Such persons are **prohibited** from involvement in any Campaign policy-making on the subjects on which they are registered, including service on policy task forces or participation in policy discussions on those subjects. Such persons are **also prohibited** from lobbying Senator McCain or his Senate personal office or committee staffs during the period they are volunteering for the campaign.
- 3.) No person with a McCain Campaign title or position may participate in a 527 or other independent entity that makes public communications that support or oppose any presidential candidate.
- 4.) No vendor to the McCain Campaign may also be a vendor to a 527 or other independent entity that makes public communications that support or oppose any presidential candidate without a pre-approved firewall pursuant to FEC regulations.
- 5.) Senator McCain has also announced that it will be his policy that anyone serving in a McCain Administration must commit not to lobby the Administration during his presidency.

### IMPLEMENTATION

In order to effectively implement and enforce this policy, please follow these directions:

- 1.) **All personnel must complete the attached questionnaire** and return it Ryan Bradel in the Legal Department. It is the **personal responsibility** of each employee, consultant and volunteer to **disclose** all previous lobbying employers and clients to the Campaign and to identify issues and clients that could be embarrassing for the Senator and the Campaign.

- 2.) Division Directors must inform Ryan Bradel in the Legal Department when they have made new hires or assigned titles to outside part-time volunteers (e.g., coalition chairs, policy committee members, etc).
- 3.) Those staff members who have been registered lobbyists or foreign agents must ensure that their registrations have been formally terminated by asking their former employers to terminate their status and by filing the necessary paperwork with the appropriate authorities. Ryan Bradel in the Legal Department can aid you in filing the appropriate forms.
- 4.) Those staff members who have been registered lobbyists or foreign agents must certify with their Division Directors that they have given the Campaign a complete and accurate list of former lobbying employers and clients and that they have filed the necessary paperwork to terminate their status.