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**REPUBLICAN  
ATTORNEYS  
GENERAL  
ASSOCIATION**

**CONTRIBUTIONS TO PAM BONDI OR HER POLITICAL CAUSES BY RAGA**

**Money sent to “Justice for All” or “And Justice for All” Groups Associated with Bondi**

|   |           |
|---|-----------|
| 9/23/13 Republican State Leadership Committee Florida PAC | \$500,000 |
| 12/13/13 Republican State Leadership Committee Florida    | \$50,000  |
| 1/28/14 Republican State Leadership Committee-Florida PAC | \$100,000 |
| 10/06/14 Republican Attorneys General Association         | \$100,000 |

Until early 2014, RAGA was a part of the Republican State Leadership Committee

**CONTRIBUTIONS IN 2013 FROM DICKSTEIN AND ONE OF ITS ATTORNEY GENERAL CLIENTS**

|                                 |                           |                   |                     |
|---------------------------------|---------------------------|-------------------|---------------------|
| <b>And Justice For All</b>      | <b>Lori Kalani</b>        | <b>11/10/2013</b> | <b>\$1,000</b>      |
| <b>Justice for All</b>          | <b>Bernard Nash</b>       | <b>11/22/13</b>   | <b>\$1,000</b>      |
| <b>Justice for All</b>          | <b>Dickstein Shapiro,</b> | <b>11/30/13</b>   | <b>\$1,000</b>      |
| <b>Florida Republican Party</b> | <b>Dickstein Shapiro</b>  | <b>2/28/2013</b>  | <b>\$2,500</b>      |
| <b>Florida Republican Party</b> | <b>Lori Kalani</b>        | <b>2/28/2013</b>  | <b>\$2,000</b>      |
| <b>Florida Republican Party</b> | <b>Bernard Nash</b>       | <b>2/28/2013</b>  | <b>\$2,000</b>      |
| <b>Florida Republican Party</b> | <b>Milton Marquis</b>     | <b>2/28/2013</b>  | <b>\$500</b>        |
| <b>Florida Republican Party</b> | <b>Chris Tampio</b>       | <b>2/28/2013</b>  | <b>\$250</b>        |
| <b>And Justice for ALL</b>      | <b>ETC Capital</b>        | <b>9/13/2013</b>  | <b>\$ 10,000.00</b> |

"Nash, Bernard" <NashB@dicksteinshapiro.com>

2/17/2011 12:19:09 PM

To: "pam.bondi@myfloridalegal.com" <pam.bondi@myfloridalegal.com>

cc: "Joe Jacquot" <Joe.Jacquot@myfloridalegal.com>

Subject: Citronelle Dinner/March 8

Pam -- I enjoyed meeting you at recent NAAG and RAGA meetings. For the past 27 years, my firm and I have hosted a dinner for AGs, which your predecessors attended, during the NAAG March meeting in DC. We are again hosting this year's dinner at Citronelle, and expect about 25 AGs and an equal number of Chief Deputies to attend.

^

I hope your schedule will permit you to join us. I guarantee that it will be an evening you will enjoy and remember! Another copy of our invitation is attached.

^

Best,  
Bernie

^

Bernard Nash

Partner

Dickstein Shapiro LLP

1825 Eye Street NW | Washington, DC 20006

Tel (202) 420.2209 | Direct Fax (202) 379.9353 ^

nashb@dicksteinshapiro.com  
^

**Bernard Nash**

Partner

Dickstein Shapiro LLP

1825 Eye Street NW | Washington, DC 20006

Tel (202) 420.2209 | Direct Fax (202) 379.9353

[nashb@dicksteinshapiro.com](mailto:nashb@dicksteinshapiro.com)

**BERNIE NASH, MILTON MARQUIS & DIVONNE SMOYER**  
cordially invite you and your significant other to attend

Dickstein Shapiro's  
27<sup>th</sup> NAAG Spring Meeting Dinner

Tuesday, March 8, 2011

(following the NAAG Supreme Court Reception)

7:00 PM: Cocktails      8:00 PM: Dinner

**Citronelle**

The Latham Hotel

3000 M Street NW | Washington, DC  
(corner of 30th & M streets)

Transportation will be provided outside  
the Supreme Court starting at 6:30 PM

**DICKSTEINSHAPIRO**LLP

Kindly RSVP by February 25

Emily Lundahl at (202) 420-3304 | [lundahle@dicksteinshapiro.com](mailto:lundahle@dicksteinshapiro.com)

114017249.txt

"Smyer, Divonne" <SmyerD@dicksteinshapiro.com>  
3/11/2011 2:22:52 PM

To: "carlos.muniz@myfloridalegal.com" <carlos.muniz@myfloridalegal.com>  
cc:

Subject: Nice to see you again in DC this past week

Carlos --

I just wanted to drop you a quick like to let you know that it was great seeing you again after so long; I was grateful for the chance to catch up a little bit at the Supreme Court reception.

I look forward to working with you in your new capacity!

Warm regards,

Divonne

Divonne Smyer  
Partner  
Dickstein Shapiro LLP  
1825 Eye Street NW | Washington, DC 20006  
Tel (202) 420-2665 | Fax (202) 379-9256  
smyerd@dicksteinshapiro.com

To: David Satz  
John Maddox  
Caesars Entertainment Corporation

From: Milton A. Marquis  
Lori Kalani  
J.B. Kelly  
Chris Tampio

Date November 27, 2013

Re: Attorney General Strategy

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As requested, below is our proposal to assist Caesars Entertainment to combat Sheldon Adelson's campaign to generate State Attorneys General ("AG") opposition to on-line gaming.

### **Why AGs Matter**

AGs primarily serve as their State's lawyer. While they are lawyers first, AGs are also policy advocates, regulators, and enforcers. They are also influential on legislation. They interpret state laws by issuing opinions. Many have original criminal prosecutorial authority. All of them are seen as the state's top cop. Simply put, AGs hold a unique position in that they have almost unfettered ability to use their "bully pulpits" to advocate on behalf of the public interest.

The AG's front office is generally comprised of lawyers and others who are charged with developing and executing the AG's priorities. The front office generally includes a Chief Deputy, Chief of Staff, Policy Advisor, Public Information Officer and Legislative Liaison. These officials serve at the pleasure of the AG and generally assist in advancing the AG's interests. Front office interest or lack of interest in an issue can come from an assessment of media reports and potential media scrutiny; advocacy group requests; political benefit or detriment; legislative inquiries; and "pitches" made by law firms or other professionals in whom the front office has confidence.

### **AG Strategy and Proposal**

Our collective experience working with and within the AG community is that when there are public campaigns (*e.g.*, advocacy driven) about the business practices of a national company or industry, AG offices have an awareness, and often a one-sided awareness, of the issues and the company and the industry. When that occurs, we believe the better course is for the industry to proactively engage the

AG community at several levels. We recommend that Caesars engage the AG community with an initial three-fold goal:

1. Define the Adelson campaign for what it is: a self-interested attempt to protect his interests by imposing ill-advised and unnecessary legal barriers to on-line gaming under the guise of consumer protection;
2. Educate AG offices on the need to protect the historic state prerogative to regulate gaming within state borders;<sup>1</sup> and
3. Promote the economic benefits of on-line gaming to any state that chooses to permit extensively regulated on-line gaming within its borders.

To achieve these goals, and as discussed in more detail below, we propose the following AG strategy for Caesars:

1. **Intelligence gathering:** Dickstein will actively gather intelligence from the AG community to assess the impact of Adelson’s campaign and the possibility of AG action.
2. **Educate ourselves:** We will become fully versed in Caesars business model and its assessment of the Adelson campaign.
3. **Develop talking points for the AG community:** We will use our knowledge of the AG offices and, working with the Caesars strategy team, develop legal and policy talking points promoting our goals for use with the AG community.
4. **Educate the AG community:** Using our knowledge of and relationships with the AG community, we will identify the best means to educate AGs and their staff on defining Adelson and promoting the benefits and consumer protections associated with on-line gaming. As discussed below, there are several layers of education which will be honed as we continue to gather intelligence regarding Adelson’s activities.
5. **Coordinate efforts:** We will work with Caesars internal and external teams to coordinate messages, share information and refine goals and strategies. We will identify members of the Caesars team and its other consultants who may provide additional leverage within the AG community, as needed.
6. **Become Caesars advocates at AG gatherings:** We are in constant communication with AGs and their staffs. We attend all AG meetings. We will use our knowledge of the Adelson campaign to promote the company’s goals during those interactions. We will act as a resource for the AG community if they have questions or need information.
7. **Continue Monitoring and Refining Strategy and Goals:** From our experience, we know that events can change, often rapidly. We do not believe that a strategy should be static. It must be constantly assessed when there is new or different information available. We are adaptable, and our working relationships within the AG community has allowed us to maintain credibility for our clients even when new facts emerge that were previously not known.

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<sup>1</sup> See *Thomas v. Bible*, 694 F.Supp. 750, 760 (D. Nev. 1988)(“Licensed gaming is a matter reserved to the states within the meaning of the Tenth Amendment of the United States Constitution.”), *aff’d*, 896 F.2d 555 (9th Cir. 1990).

**Implementation**

Caesars and others in the gaming industry are facing a sophisticated campaign to generate opposition to on-line gaming. We have been involved both inside AG offices and representing companies, with corporate and advocacy campaigns directed at AGs. It is important not to allow the adversary's campaign to define Internet gaming.

Engaging in initial intelligence gathering on the impact of the Adelson campaign is having will enable us to hone a more effective strategy with the AGs. We will talk in a confidential manner with trusted AGs, front office staff and consumer lawyers. **We will be attending the Conference of Western Attorneys General meeting on December 3 and will be in New Orleans during the remainder of the week meeting with AGs and senior staff while the closed-door NAAG meeting is taking place. Engaging AGs and senior deputies at this meeting is critical in light of the pendency of the NAAG letter. We fully expect that Adelson's team will be feverishly lobbying AGs to sign on to the letter during the meeting. In addition, the authors of the letter will certainly be urging their fellow AGs to sign on.**

We believe counteracting corporate campaigns in AG offices requires carefully honed talking points that address both legal and policy issues. These talking points are generally not intended for distribution, but are for use by our team to use within the AG community. We believe that it is important that the Caesars team participate in the development of the talking points and that the group sign off on the talking points before their use. This should be done as soon as possible.

Educating AGs is the critical element of our proposal. There are many factors that will dictate how best to disseminate messages and build positive relationships.

As we discussed yesterday, in the short run, it is our view that Caesars and the industry should stress to AGs the need for them to become better educated on the legal and policy issues associated with on-line gaming before staking out a position on possible federal legislation. Put simply, the industry should urge AGs to thoroughly vet the positions asserted by Adelson and his allies before adopting positions early on that may be difficult to retreat from after further consideration. There is, the industry should argue, no looming deadline that requires quick action and therefore there is no need for AGs to "rush to judgment" on such an important and far-reaching issue.

Longer term, Caesars and its allies should develop legally sound positions that can be communicated to AGs orally and possibly through White Papers regarding the need to protect state prerogatives against overreaching and unnecessary federal intrusion into the regulation of gaming. Federalism arguments have bi-partisan appeal among AGs.

The NAAG letter, for example, mischaracterizes "the inherently *interstate* nature of internet gambling transaction[s]." (emphasis in original) First, as you are aware, Congress expressly declared in the



Unlawful Internet Gambling Enforcement Act (“UIGEA”), 31 U.S.C. §5361, that “a bet or wager . . . initiated and received or otherwise made exclusively within a single State,” which is in accord with state law, including “age and location verification requirements,” will not constitute “unlawful Internet gambling.” *Id.* §5362(10)(B). Significantly, UIGEA states that the “intermediate routing of data packets does not determine the location in which bets or wagers are made.” *Id.* Thus, even if a gaming transaction is intermediately routed outside the state, the wager is still considered to be “made exclusively within a single State.” This is important because Congress, in the last gambling statute it enacted, declared that the Internet does not render every wagering transaction “inherently interstate,” and therefore the states remain free to exercise their historic role to regulate Internet gambling.

In addition, as our Firm discussed in great detail with the U.S. Justice Department in the course of our representation of the Illinois Lottery, there are well-designed technology and measures available to states to verify age to prevent underage wagering and verify location to ensure that wagering occurs within a state.<sup>2</sup> AGs should be educated on the law and the robust consumer protections available to ensure that minors do not wager and that wagering transactions are truly intrastate.

Finally, the NAAG letter (and much of the press coverage on this issue) inaccurately describes the state of the law at the time of the OLC opinion. Although it is true that the Bush Justice Department took the position in 2005 that the Wire Act outlawed Internet lottery ticket sales,<sup>3</sup> as we discussed in the White Paper and in meetings with DOJ, the position taken by the Bush DOJ was at odds with well-established precedent interpreting the Wire Act. Enacted in 1961, the Wire Act was an element of a major anti-organized crime initiative by then-Attorney General Robert Kennedy that was directly aimed at bookies who used interstate wire communication to place bets on sporting events. Courts interpreting the Act held that the Act applied only to sports gambling. *See, e.g., Thompson v. MasterCard International, Inc.*, 313 F.3d 257, 262-63 & n.20 (5th Cir. 2002)(“[a] plain reading of the statutory language [of the Wire Act] clearly requires that the object of the gambling be a sporting event or contest.”). AGs therefore are being misinformed that the OLC opinion was an unprincipled “about face.” It is clear that the OLC opinion concerning the reach of the Wire Act was consistent with Wire Act precedent.

In sum, it is critical that Caesars and its allies engage substantively with AGs and senior staff quickly, assisted by counsel who have credibility with and knowledge of AGs and their offices.

#### Attendance at Select National AG Meetings/Presentations to AGs

Establishing relationships with AGs is a critical component of an effective education and outreach strategy. We recommend that individuals from Caesars legal and government affairs departments

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<sup>2</sup> As we discussed, Dickstein successfully represented the Illinois Lottery before the DOJ, which led to the DOJ Office of Legal Counsel (“OLC”) Wire Act opinion. The OLC opinion borrows heavily from the White Paper we submitted on behalf of Illinois. No firm has more credibility on this issue with AGs than Dickstein.

<sup>3</sup> Letter from Laura H. Parsky, Deputy Assistant Attorney General, Criminal Division, to Carolyn Adams, Illinois Lottery Superintendent (May 13, 2005).

attend national AG meetings and dinners, which present invaluable opportunities to establish personal relationships with AGs and key AG staff and educate them on the company and its issues. Through their interaction with AGs, these individuals will become the “face” of the company to AGs, who are less likely to demagogue companies they know and respect. Positive outreach efforts also will allow Caesars to counter and contain more effectively attempts by Adelson to encourage AGs to investigate the company.

We recommend that Caesars attend meetings of the National Association of Attorneys General (“NAAG”), the Democratic Attorneys General Association (“DAGA”), Republican Attorneys General Association (“RAGA”) and Conference of Western Attorneys General (“CWAG”) taking place this year. The four of us generally all attend every AG meeting. AG meetings in the next six months that will draw a significant number of AGs include:

- CWAG Winter Dinner – December 3 (New Orleans) (30+ AGs typically attend)
- DAGA Holiday Function – December 11 (Washington, DC) (typically 15 -20 AGs attend)
- DAGA Winter Policy Conference – January 23-25, 2014 (Orlando FL)(typically 15-20 AGs attend)
- DAGA Pre-NAAG Reception and Dinner – February 23 (Washington, DC)(typically 20 AGs attend)
- RAGA Winter National Meeting – February 23-25 (Washington, DC)(typically 20 AGs attend)
- NAAG Winter Meeting – February 24-26 (Washington, DC)(typically 40 AGs attend)
- DAGA Spring Policy Conference – May 7-8 (Seattle, WA)(typically 15-20 AGs attend)

#### Individual Meetings with AGs

Either at the national AG meetings or during in-state visits, we recommend that our team take executives from Caesars to meet, in particular, with AGs of key states where: (1) Caesars has a presence; (2) their states have implemented Internet gaming; and (3) the AG is a “thought leader” among his or her peers. As discussed above, Caesars should take the opportunity at such meetings to communicate the benefits and consumer safeguards relating to on-line gaming, the company’s commitment to consumers, and its robust technology, consumer protection and compliance programs. These meetings also will allow Caesars to more effectively gather intelligence and contain attempts by adversaries to cultivate support for efforts contrary to the company’s interests.

Our initial recommendation is to focus on the following AGs (subject to further discussions with you and your colleagues):

- NV AG Catherine Cortez Masto (D): As the AG of the center of legalized gaming in the U.S., AG Masto is or will be a thought leader regarding Internet gaming. Since she will be

serving her last year in office, it will also be important to engage with Ross Miller and the other candidates vying to succeed her. Lori Kalani is a close personal friend of the AG, and others in the Firm also have good relationships with her.

- FL AG Pam Bondi (R): Elected in 2010, AG Bondi is a business-friendly, media-savvy AG who is well regarded by her peers. Unique among the states, the FL AG also serves in the Cabinet, which with the Governor has jurisdiction over a wide range of issues affecting the state. AG Bondi could be a thought leader on this issue.
- OK AG Scott Pruitt (R): AG Pruitt has quickly become one of the leading AGs on a host of issues, particularly those that impact the proper roles of the federal government and states. He should be sympathetic to the industry's federalism arguments.
- DE AG Beau Biden (D): As the AG of one of the few states that have implemented Internet gaming, AG Biden will also become a thought leader on this issue. In addition, he is well regarded by his peers.
- IL AG Lisa Madigan (D): As the AG of a state that has implemented Internet lottery sales, AG Madigan is a potential ally. She should be concerned that amending the Wire Act could jeopardize the legality of Illinois Lottery Internet sales.
- NY AG Eric Schneiderman (D): The New York Lottery joined with the Illinois Lottery to seek the reversal of the Bush DOJ Wire Act position. As with Illinois, any modification of the Wire Act threatens NY's plans to offer lottery tickets via the Internet. In addition, AG Schneiderman is an activist pro-consumer AG. It will therefore be critical to convince him that Internet gaming can be done safely.
- TN AG Robert Cooper (D): Appointed by the Tennessee Supreme Court, AG Cooper is widely admired for his thoughtfulness and legal ability.
- CT AG George Jepsen (D): AG Jepsen has quickly earned a reputation for carefully evaluating legal and policy arguments made by advocates before adopting a position.
- GA AG Sam Olens (R): A pro-business AG, AG Olens has become a thought leader on business issues, particularly among his Republican colleagues.

#### Collaborating with Third-Party Advocates

We will assess the value of engagement with AGs by third-parties aligned with Caesars. Third-parties would be able to discuss with AGs the benefits on Internet gaming without having to defend any particular company's business practices. However, as discussed above, Caesars must develop its own relationships with AGs to credibly refute Adelson and his allies. In addition, third-parties will not have the immediate access to decision makers as Dickstein would have.

**Fees**

For the education and outreach strategy that we have presented in this memo, we propose an initial six month representation of Caesars for a flat fee retainer of \$35,000 per month plus expenses.<sup>4</sup> While we are hopeful that six months would be sufficient time to achieve the goal of educating a critical mass of AGs, we would make a recommendation for an ongoing strategy once we are over the initial hurdle in six months. There may be a point at which it is necessary to engage in research and draft policy papers, presentations, legal memoranda, or other documents. Except where expressly noted, such work would not be included as part of the engagement described above. Should Caesars elect to use our team for such projects, those services would be performed and billed on an hourly basis after approval from Caesars. In addition, in-state meetings with AGs on behalf of Caesars would be billed on an hourly basis.

As a full-service practice, our AG team regularly handles investigations and other government inquiries for large companies involving AGs and other government agencies.<sup>5</sup> Any expansion of our representation to assist with AG and government inquiries would generally be billed by the hour.

**Conclusion**

We appreciate the opportunity to share our thoughts regarding the Adelson campaign and recommend a proactive AG strategy. We look forward to continuing our ongoing discussion at your earliest convenience.

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<sup>4</sup> When possible, we will prorate Caesars' share of expenses among multiple clients if we are attending or hosting AG meetings or events where other clients' issues also are discussed.

<sup>5</sup> Our group is currently handling investigations for several major companies, including AT&T, DISH Network, a major beverage manufacturer, and several for-profit colleges.

**BERNIE NASH, MILTON MARQUIS & DIVONNE SMOYER**  
cordially invite you and your significant other to attend

Dickstein Shapiro's  
CWAG Summer Meeting Dinner

Tuesday, July 12, 2011

6:30 PM: Cocktails      7:30 PM: Dinner

**Brown's Beach House Restaurant**  
The Fairmont Orchid  
Kona, HI

**DICKSTEINSHAPIRO**<sub>LLP</sub>

Kindly RSVP by Monday, June 27

Emily Lundahl at (202) 420-3304 | [lundahle@dicksteinshapiro.com](mailto:lundahle@dicksteinshapiro.com)



HAND DELIVER 1/83

COMMISSION ON ETHICS

Form 9

CONFIDENTIAL  
QUARTERLY GIFT DISCLOSURE  
(GIFTS OVER \$100)

DATE RECEIVED  
DEC 21 2011

|   |              |  |  |
|---|--------------|--|--|
| LAST NAME - FIRST NAME - MIDDLE NAME<br>Bondi Pamela Jo |              | NAME OF AGENCY<br>Office of the Attorney General |  |
| MAILING ADDRESS<br>PL-01 The Capitol                    |              | OFFICE OR POSITION HELD<br>Attorney General      |  |
| CITY<br>Tallahassee                                     | ZIP<br>32399 | COUNTY<br>Leon                                   | FOR QUARTER ENDING (CHECK ONE)<br><input type="checkbox"/> MARCH <input type="checkbox"/> JUNE <input checked="" type="checkbox"/> SEPTEMBER <input type="checkbox"/> DECEMBER |
|   |              |  | YEAR<br>2011   |

PART A - STATEMENT OF GIFTS

Please list below each gift, the value of which you believe to exceed \$100, accepted by you during the calendar quarter for which this statement is being filed. You are required to describe the gift and state the monetary value of the gift, the name and address of the person making the gift, and the date(s) the gift was received. If any of these facts, other than the gift description, are unknown or not applicable, you should so state on the form. As explained more fully in the instructions on the reverse side of the form, you are not required to disclose gifts from relatives or certain other gifts. You are not required to file this statement for any calendar quarter during which you did not receive a reportable gift.

PROCESSED

| DATE RECEIVED | DESCRIPTION OF GIFT | MONETARY VALUE | NAME OF PERSON MAKING THE GIFT          | ADDRESS OF PERSON MAKING THE GIFT  |
|---------------|---------------------|----------------|---|------------------------------------|
| 7/10-7/13     | CWAG Annual meeting | 1,597.00       | Conference of Western Attorneys General | 1500 I Street Sacramento, CA 95814 |
|               |                     |                |   |                                    |
|               |                     |                |   |                                    |
|               |                     |                |   |                                    |

CHECK HERE IF CONTINUED ON SEPARATE SHEET

PART B - RECEIPT PROVIDED BY PERSON MAKING THE GIFT

If any receipt for a gift listed above was provided to you by the person making the gift, you are required to attach a copy of that receipt to this form. You may attach an explanation of any differences between the information disclosed on this form and the information on the receipt.

CHECK HERE IF A RECEIPT IS ATTACHED TO THIS FORM

PART C - OATH

I, the person whose name appears at the beginning of this form, do  
depone on oath or affirmation and say that the information disclosed  
herein and on any attachments made by me constitutes a true accurate,  
and total listing of all gifts required to be reported by Section 112.3148

Florida Statutes  
Pam Bondi  
SIGNATURE OF REPORTING OFFICIAL

STATE OF FLORIDA  
COUNTY OF Leon  
Sworn to (or affirmed) and subscribed before me this  
15th day of December, 20 11  
by Pam Bondi  
Leslie H. Jacobs  
(Signature of Notary Public-State of Florida)

(Print, Type, or Stamp Commission Number of Notary Public) **LESLIE H. JACOBS**  
Personally Known  OR Produced   
Type of Identification Produced Commission DD 793714  
Expires June 9, 2012  
Bonded Thru Troy Fair Insurance 800-386-7019

PART D - FILING INSTRUCTIONS

This form, when duly signed and notarized, must be filed with the Commission on Ethics, P.O. Drawer 15709, Tallahassee, Florida 32317-5709, physical address 3600 Maclay Blvd. South, Suite 201, Tallahassee, Florida 32312. The form must be filed no later than the last day of the calendar quarter that follows the calendar quarter for which this form is filed (For example, if a gift is received in March, it should be disclosed by June 30)

CWAG Annual Meeting Costs  
Attorneys General Only

|            |            |
|------------|------------|
| Meals      | \$804 00   |
| Activities | \$442.00   |
| Gift Bag   | \$351.00   |
| Total      | \$1,597.00 |

114028569.txt

"Smoier, Divonne" <SmoierD@dicksteinshapiro.com>  
8/31/2011 12:29:32 PM

To: "carlos.muniz@myfloridalegal.com" <carlos.muniz@myfloridalegal.com>  
CC:

Subject: Can you and the AG join us for dinner in DC on 9/8? around 7:30?

Hi Carlos --

I hope you are well.

I know Pam will be in DC next week for a NAAG event and I hope you will be as well.

I am hoping that both of you can join us for dinner on Thursday, Sept. 8.

The new GC of our client, Pepsico, will be in town and will be joining us. Her name is Maura Smith.

Please let me know if you think you can make it.

Best, Divonne

Divonne Smoier  
Partner  
Dickstein Shapiro LLP  
1825 Eye Street NW | Washington, DC 20006  
Tel (202) 420-2665 | Fax (202) 379-9256  
smoierd@dicksteinshapiro.com



"Nash, Bernard" <NashB@dicksteinshapiro.com>

11/1/2011 3:17:59 PM

To: Undisclosed recipients.;

cc:

Subject: RAGA Meeting Dinner - LOCATION DETAILS

Bernie Nash, Jerry Kilgore and Mike Turpen invite you to join us for dinner during the RAGA meeting in Palm Beach, FL. The dinner will take place Monday, November 14 at 8:00 pm at The Flagler Steakhouse of The Breakers Hotel.

^

Please call Emily Lundahl at (202) 420-3304 or e-mail her at lundahle@dicksteinshapiro.com as soon as you know whether your schedule will permit you to join us.

^

We look forward to seeing you.

^

Best regards,

^

Bernie

^

Bernard Nash

Partner

Dickstein Shapiro LLP

1825 Eye Street NW | Washington, DC 20006

Tel (202) 420.2209 | Direct Fax (202) 379.9353

nashb@dicksteinshapiro.com

DATE RECEIVED

2/7/11

**Form 9 QUARTERLY GIFT DISCLOSURE (GIFTS OVER \$100)**

|  |                     |                       |  |  |
|--|---------------------|-----------------------|--|--|
| LAST NAME -- FIRST NAME -- MIDDLE NAME<br><u>Bondi Pamela Jo</u> |                     |                       | NAME OF AGENCY<br><u>Office of the Attorney General</u>  |  |
| MAILING ADDRESS<br><u>PL-01 The Capitol</u>                      |                     |                       | OFFICE OR POSITION HELD<br><u>Attorney General</u>   |  |
| CITY<br><u>Tallahassee</u>                                       | ZIP<br><u>32399</u> | COUNTY<br><u>Leon</u> | FOR QUARTER ENDING (CHECK ONE) YEAR<br><input type="checkbox"/> MARCH <input type="checkbox"/> JUNE <input type="checkbox"/> SEPTEMBER <input checked="" type="checkbox"/> DECEMBER 20 <u>11</u> |  |

**PART A — STATEMENT OF GIFTS**

Please list below each gift, the value of which you believe to exceed \$100, accepted by you during the calendar quarter for which this statement is being filed. You are required to describe the gift and state the monetary value of the gift, the name and address of the person making the gift, and the date(s) the gift was received. If any of these facts, other than the gift description, are unknown or not applicable, you should so state on the form. As explained more fully in the instructions on the reverse side of the form, you are not required to disclose gifts from relatives or certain other gifts. You are not required to file this statement for any calendar quarter during which you did not receive a reportable gift.

**PROCESSED**

| DATE RECEIVED        | DESCRIPTION OF GIFT                          | MONETARY VALUE  | NAME OF PERSON MAKING THE GIFT                  | ADDRESS OF PERSON MAKING THE GIFT                      |
|----------------------|--|-----------------|---|--|
| <u>11/13 - 11/15</u> | <u>RAGA Fall meeting flight/hotel/ meals</u> | <u>1,273.30</u> | <u>Republican Attorneys General Association</u> | <u>1800 Diagonal Rd Suite 200 Alexandria, VA 22314</u> |
|                      |  |                 |   |  |
|                      |  |                 |   |  |
|                      |  |                 |   |  |

CHECK HERE IF CONTINUED ON SEPARATE SHEET

**PART B — RECEIPT PROVIDED BY PERSON MAKING THE GIFT**

If any receipt for a gift listed above was provided to you by the person making the gift, you are required to attach a copy of that receipt to this form. You may attach an explanation of any differences between the information disclosed on this form and the information on the receipt.

CHECK HERE IF A RECEIPT IS ATTACHED TO THIS FORM

**PART C — OATH**

|  |  |
|--|--|
| I, the person whose name appears at the beginning of this form do<br>depose on oath or affirmation and say that the information disclosed<br>herein and on any attachments made by me constitutes a true accurate,<br>and total listing of all gifts required to be reported by Section 112 3148<br>Florida Statutes | STATE OF FLORIDA<br>COUNTY OF <u>Leon</u><br>Sworn to (or affirmed) and subscribed before me this<br><u>26th</u> day of <u>March</u> , 20 <u>12</u><br>by <u>Pam Bondi</u><br><u>Leslie H. Jacobs</u><br>(Signature of Notary Public-State of Florida) |
|  | (Print, Type, or Stamp) Name of Notary Public<br>Personally Known <u>Commissioner DA 793714</u><br>Type of Identification <u>Expires June 6, 2012</u><br>Member This Notary Public Since 000 285 7000  |

SIGNATURE OF REPORTING OFFICIAL  
Pam Bondi

**PART D — FILING INSTRUCTIONS**

This form, when duly signed and notarized, must be filed with the Commission on Ethics, P.O. Drawer 15709, Tallahassee, Florida 32317-5709, physical address 3600 Maclay Blvd., South, Suite 201, Tallahassee, Florida 32312. The form must be filed no later than the last day of the calendar quarter that follows the calendar quarter for which this form is filed (For example, if a gift is received in March, it should be disclosed by June 30.)

**37 2009 CA 004303 - DEPT OF LEGAL AFFAIRS OFFICE OF THE ATTORNEY GENER vs EXPEDIA INC**

| Status | Party  | Party Code | Attorney |
|--------|--|------------|----------|
|        | ORBITZ INC ,   | DEFENDANT  |          |
|        | ORBITZ LLC ,   | DEFENDANT  |          |
|        | HOTELS COM LP ,                                      | DEFENDANT  |          |
|        | TRAVELOCITY COM LP ,                                 | DEFENDANT  |          |
|        | DELAWARE HOT WIRE INC ,                              | DEFENDANT  |          |
|        | TRAVELWEB LLC ,                                      | DEFENDANT  |          |
|        | PRICE LINE COM INC ,                                 | DEFENDANT  |          |
|        | SITE59 COM LLC ,                                     | DEFENDANT  |          |
|        | DEPT OF LEGAL AFFAIRS OFFICE OF THE ATTORNEY GENER , | PLAINTIFF  |          |
|        | EXPEDIA INC ,  | DEFENDANT  |          |
|        | TRIP NETWORK INC ,                                   | DEFENDANT  |          |

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| Action Dscr         | Status | Status Date | Disposition                      | Disposition Date | Judge   |
|---------------------|--------|-------------|----------------------------------|------------------|---------|
| OTHER CIRCUIT CIVIL | CLOS   | 11/3/2009   | DISMISSED BEFORE HEARING - OTHER | 4/8/2013         | FRANCIS |

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| Charge # | Action Code | Description | Plea Date | Plea | Decision Date | Court Action | Charge Disposition | Citation |
|----------|-------------|-------------|-----------|------|---------------|--------------|--------------------|----------|
|          |             |             |           |      |               |              |                    |          |

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| Judges Appearing on Case |            |                      |        |
|--------------------------|------------|----------------------|--------|
| Last Name                | First Name | Date Assigned        | Source |
| FRANCIS                  | CHARLES    | 11/3/2009 2:35:03 PM | BM     |

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| DOCKET TABLE HEADERS ARE SORTABLE. CLICK FOR ASCENDING, AGAIN FOR DESCENDING ORDER |             |  |         |         |        |            |        |
|--|-------------|--|---------|---------|--------|------------|--------|
| Source Table Abbreviations: BM = Benchmark; JIS = Justice Informations System      |             |  |         |         |        |            |        |
| DOCKET DATE  | DOCKET CODE | DOCKET TEXT  | OR BOOK | OR PAGE | AMOUNT | AMOUNT DUE | SOURCE |
| 11/3/2009  | COMP_CA     | COMPLAINT  |         |         | \$0.00 | \$0.00     | BM     |
| 11/3/2009  | CCS         | CIVIL COVER SHEET                                  |         |         | \$0.00 | \$0.00     | BM     |
| 11/5/2009  | CO1_CA      | COPIES RECEIPT: 268971 DATE: 11/05/2009            |         |         | \$0.00 | \$0.00     | BM     |
| 11/5/2009  | CO1_CA      | COPIES RECEIPT: 269326 DATE: 11/05/2009            |         |         | \$0.00 | \$0.00     | BM     |
| 11/6/2009  | CO1_CA      | COPIES RECEIPT: 269645 DATE: 11/06/2009            |         |         | \$0.00 | \$0.00     | BM     |
| 11/9/2009  | CO1_CA      | COPIES RECEIPT: 270620 DATE: 11/09/2009            |         |         | \$0.00 | \$0.00     | BM     |
| 9/24/2010  | NFTP        | NOTICE OF FAILURE TO PROSECUTE SENT ON: 09/24/2010 |         |         | \$0.00 | \$0.00     | BM     |
| 11/1/2010  | AMCO        | AMENDED COMPLAINT                                  |         |         | \$0.00 | \$0.00     | BM     |



# Florida House of Representatives

Representative Rick Kriseman

House District 53

District Address:  
1700 66<sup>th</sup> Street N, Suite 203  
St. Petersburg, FL 33710  
Phone: 727-552-1380

Tallahassee Address:  
316 The Capitol  
Tallahassee, Florida 32399  
Phone: 850-488-9337

Tuesday, May 17, 2011

The Honorable Pam Bondi  
Office of Attorney General  
State of Florida  
The Capitol PL-01  
Tallahassee, FL 32399-1050

Dear Attorney General Bondi,

I am writing to you because of my concerns regarding the apparent failure of numerous online travel resellers to pay those taxes due and owing to the State of Florida, along with those due and owing to local governments around the state.

As you know, there was an attempt during this past legislative session to pass legislation which would have obviated the tax obligations of online resellers.

The sponsor of the legislation, along with those who supported the legislation, claimed that there was an issue as to whether Florida Statutes required Expedia and the other online resellers pay taxes on the amount they collected vs. the amount they paid to the hotel for the rooms. It was the position of the supporters that the statutory language was ambiguous, and if anything, that the language should be construed against the tax being owed by the online resellers. Additionally, the supporters asserted that these online resellers were providing a service which was not taxable.

In preparation for the debate and discussion of this bill, I was provided with three documents which directly addressed these issues.

These three documents were obtained through discovery during litigation in Georgia. All three documents are particularly relevant to the issue of the tax liability of these online resellers because all three documents discuss Florida law and the issue of whether the tax should have been paid, whether the companies knew the tax should have been paid, and the efforts taken by the online resellers to avoid paying the tax.

I call your attention to several statements in each document.

First, in the document titled MSB Occupancy Tax Analysis (July 28, 2003), beginning on page one of what is an “Expedia confidential Attorney work product” document, you will note that it says

“The tax is assessed on the *entire* (emphasis added by author) price of the occupancy, and tax authorities typically define this entire price as the price that the consumer (emphasis added by author) perceives to be the price of the hotel room?”

“...some states only taxing sales by “hotel operators,” and other states more broadly taxing sales by any entity deemed to be selling the hotel occupancy ( e.g. dealer, vendor, retailer, reseller, etc.)”

**“Expedia is not currently collecting occupancy tax in any state, but we are taking a reserve each quarter based on an estimate of uncollected taxes that we may ultimately owe”.** (Emphasis added by me).

**“IN WHICH STATES ARE OCCUPANCY TAXES AN ISSUE?**

We have focused our lobbying and analysis efforts, to date, first, on these aggressive jurisdictions and, second, on those jurisdictions that compromise the largest portions of our merchant hotel revenue.

...this analysis does not assess whether state or local tax authorities will pursue (emphasis added by author) Expedia for occupancy tax.....I believe that this risk is high in many states...”

**“WHAT CAN EXPEDIA DO IN ORDER TO MINIMIZE OCCUPANCY TAX EXPOSURE?**

...assembling a strong team of experts to lobby the seemingly more aggressive tax authorities.”

**“IS THERE ANYTHING THAT WE CAN DO NOW IN ORDER TO STRENGTHEN OUR POSITION WITH RESPECT TO THE TAX AUTHORITIES?**

...various tax authorities could still make strong arguments (possibly even winning arguments) that we are subject to occupancy tax in their state.”

**“IF ANY TAX AUTHORITY THREATENS LITIGATION, DO WE LITIGATE OR SIMPLY BECOME A TAX COLLECTOR IN THAT STATE?**

...it appears that the stakes are high enough that we should resist, delay and make it as difficult as possible for any state to require us to collect occupancy tax. (Emphasis added by me).

I am guessing that most tax regulators – even the most obstinate – will offer up some sort of settlement before threatening litigation (as discussed above, Florida is currently offering to forgive all back taxes if we register as a tax collector going forward). We need to assess at that time...whether state legislatures would be inclined to effect legislative solutions, etc.”

**“IF WE DO BEGIN PAYING OCCUPANCY TAX IN ANY STATE,  
SHOULD WE PASS ON THE TAX COSTS TO CUSTOMERS?”**

Regarding the question of whether we should pass on occupancy tax costs to our customers, **the current answer is “no”**,..we do not currently believe that is possible from a competitive standpoint.” (Emphasis added by me).

Expedia and Hotels.com also received a legal opinion on this issue from the law firm of Holland and Knight. In that opinion, dated January 28, 2003, they again were told that in the State of Florida, they were obligated to collect that tax and remit same to the State. Specifically, beginning on page 1, Expedia was told

“Based on our review, it appears that the total price that customers pay to the companies for hotel rooms is subject to taxation in most jurisdictions analyzed, given that accommodations tax is typically imposed based on the total consideration received for occupancy.”

Page 2 says “Generally speaking, you will find herein that the main protection that the companies have is in the plain language of many of the statutes analyzed, which limit the incidence of the tax to “hotel operators” or to some other synonymous class of persons in charge of a hotel. A few state statutes that we have examined don’t have such limiting language (**Florida, chief among them**) which creates exposure for the companies.” (Emphasis added by me)

Page 4 discusses Florida, in particular. It was noted that in Expedia’s preliminary analysis, it “determined that it has a high risk of exposure to state and local taxes in Florida.” “The Deloitte memo finds that is “reasonable to expect” that Florida would look to Hotels.com for tax on its mark-up, and the Jones Day memo determines that it is likely that Hotels.com has occupancy tax collection responsibilities in Florida.” “..we think that is very likely that the Department will determine, and courts would affirm, that the companies should collect and remit transient accommodations taxes on the full retail price charged for Florida hotel rooms.”

Finally, in a memo from PriceWaterhouseCoopers, on page 3, for the State of Florida, it stated that

“..the technical analysis provides that Florida will impose the tax on the gross proceeds received from the customer.”

“Based on our review of the statute, regulations, the TAA discussed above...the transient rentals tax is likely due on the total charge to the customer therefore the risk is considered **VERY HIGH.**”

Clearly, these documents indicate that Expedia, Hotels.com, and the other online resellers knew, back in 2003, that they owed the taxes to our State, and have been purposefully and intentionally failing to pay the taxes, hoping that they wouldn't be prosecuted by the State or that any suits filed against them wouldn't be resolved before they could favorably change Florida State Law.

As you know, Florida Statute 125.0104 (8)(a) provides that "Any person who is taxable hereunder who fails or refuses to charge and collect from the person paying any rental or lease the taxes herein provided, either by himself or herself or through agents or employees is, in addition to being personally liable for the payment of the tax, guilty of a misdemeanor of the first degree..."

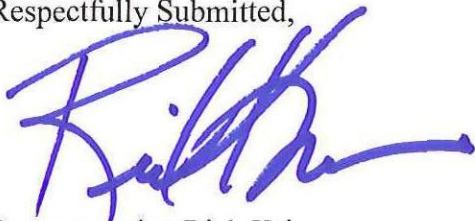
As our State's highest-ranking law enforcement official, and as the people's attorney, you have the authority to pursue an action on behalf of the citizens of this Florida, to not only collect those taxable sums due and owing to our State (which I have been told amounts to approximately **\$100,000,000.00 per year**), but to criminally prosecute those who have intentionally violated Florida law.

Therefore, please accept this letter as my request, on behalf of the citizens of District 53 and the State of Florida, that you pursue all sums due to our State along with any criminal prosecution that can be taken against those who have deliberately disregarded our laws.

Please also know that my office stands ready and willing to provide any assistance to you in pursuing this matter.

I look forward to hearing from you in response to this request in the near future.

Respectfully Submitted,



Representative Rick Kriseman



**Re: Checking in**  
Trish Conners to: Tampio, Christopher

01/31/2012 11:15 AM

Yes, Chris, we did file something that would keep the record active. The AG was not prepared to dismiss at this time.

"Tampio, Christopher" Trish, Thank you so much for chatting with... 01/31/2012 07:49:54 AM

From: "Tampio, Christopher" <TampioC@dicksteinshapiro.com>  
To: "trish.conners@myfloridalegal.com" <trish.conners@myfloridalegal.com>  
Date: 01/31/2012 07:49 AM  
Subject: Checking in

Trish,

Thank you so much for chatting with me last week about the online travel site suit.

I wanted to see if your office had made a decision on how to proceed?

I hope to see you at the NAAG meeting in March.  
All the best.

Chris

**Chris Tampio**  
Senior Advisor  
Dickstein Shapiro LLP  
1825 Eye Street NW | Washington, DC 20006  
Tel (202) 420-2708 | Fax (202) 379-9186  
[tampioc@dicksteinshapiro.com](mailto:tampioc@dicksteinshapiro.com)



**BERNIE NASH, MILTON MARQUIS, DIVONNE SMOYER & CHRIS TAMPPIO**  
cordially invite you and your significant other to attend

Dickstein Shapiro's  
28<sup>th</sup> NAAG Spring Meeting Dinner

Tuesday, March 6, 2012

(following the NAAG Supreme Court Reception)

7:00 PM: Cocktails      8:00 PM: Dinner

Citronelle

The Latham Hotel

3000 M Street NW | Washington, DC

(corner of 30th & M streets)

Transportation will be provided outside  
the Supreme Court starting at 6:30 PM

**DICKSTEINSHAPIRO**LLP

Kindly RSVP by February 24

Emily Lundahl at (202) 420-3304 | [lundahle@dicksteinshapiro.com](mailto:lundahle@dicksteinshapiro.com)

"Lundahl, Emily" <LundahlE@dicksteinshapiro.com>

2/21/2012 5:42:08 PM

To: "carlos.muniz@myfloridalegal.com" <carlos.muniz@myfloridalegal.com>

cc:

Subject: Dickstein's 28th NAAG Spring Meeting Dinner - Tues., March 6

Mr. Muñiz,

I am following up to our previous e-mail inviting you to our annual dinner at Citronelle. Please let me know if you can join us.

Emily

Emily J. K. Lundahl

Legal Secretary to Bernard Nash,

Stacey J. Mobley, Richard Perrin & Linda Chase

(202) 420-3304

lundahle@dicksteinshapiro.com

1830

HAND DELIVERED COMMISSION ON ETHICS

Form 9

QUARTERLY GIFT DISCLOSURE (GIFTS OVER \$100)

DATE RECEIVED JUN 28 2012

Form fields: LAST NAME - FIRST NAME - MIDDLE NAME (Bondi, Pamela Jo), NAME OF AGENCY (Office of the Attorney General), MAILING ADDRESS (PL-01 The Capitol), OFFICE OR POSITION HELD (Attorney General), CITY (Tallahassee), ZIP (32399), COUNTY (Leon), FOR QUARTER ENDING (CHECK ONE) (MARCH, JUNE, SEPTEMBER, DECEMBER), YEAR (2012)

PROCESSED

PART A - STATEMENT OF GIFTS

Please list below each gift, the value of which you believe to exceed \$100, accepted by you during the calendar quarter for which this statement is being filed. You are required to describe the gift and state the monetary value of the gift, the name and address of the person making the gift, and the date(s) the gift was received.

Table with 5 columns: DATE RECEIVED, DESCRIPTION OF GIFT, MONETARY VALUE, NAME OF PERSON MAKING THE GIFT, ADDRESS OF PERSON MAKING THE GIFT. Includes entries for Aspen Institute, Faces of Substance Abuse Conference, RAGA Regional Meeting, and RAGA Winter Meeting.

CHECK HERE IF CONTINUED ON SEPARATE SHEET

PART B - RECEIPT PROVIDED BY PERSON MAKING THE GIFT

If any receipt for a gift listed above was provided to you by the person making the gift, you are required to attach a copy of that receipt to this form. You may attach an explanation of any differences between the information disclosed on this form and the information on the receipt.

CHECK HERE IF A RECEIPT IS ATTACHED TO THIS FORM

PART C - OATH

I, the person whose name appears at the beginning of this form, do depose on oath or affirmation and say that the information disclosed herein and on any attachments made by me constitutes a true accurate, and total listing of all gifts required to be reported by Section 112.3148, Florida Statutes.

SIGNATURE OF REPORTING OFFICIAL (Signature of Pamela Jo Bondi)

STATE OF FLORIDA COUNTY OF Leon Sworn to (or affirmed) and subscribed before me this 25 day of June, 2012 by Pamela Jo Bondi (Signature of Notary Public State of Florida)

(Print, Type, or Stamp Commission Name of Notary Public Commission # EE 197379 Expires June 6, 2016) LESLIE H. JACOBS

PART D - FILING INSTRUCTIONS

This form, when duly signed and notanized, must be filed with the Commission on Ethics, P.O. Drawer 15709, Tallahassee, Florida 32317-5709, physical address 3600 Maclay Blvd. South, Suite 201, Tallahassee, Florida 32312. The form must be filed no later than the last day of the calendar quarter that follows the calendar quarter for which this form is filed (For example, if a gift is received in March, it should be disclosed by June 30.)

RAGA Winter National Meeting – Washington DC – March 4-5, 2012

General Bondi:

Flight: N/A

Meals: \$359.99

Hotel: \$603.02

On Nov 5, 2012, at 2:59 PM, "Kalani, Lori" <[KalaniL@dicksteinshapiro.com](mailto:KalaniL@dicksteinshapiro.com)>  
wrote:

Hope all is well. I look forward to seeing you next week in AZ. I wanted to be sure that you knew about a dinner that Dickstein is hosting on Monday, Nov 12th. We will be dining at Bourbon Steak right at The Fairmont. Cocktail reception will start at 7:30 pm and dinner will be served at 8:30 pm. I hope you can make it. It should be funŠ..and shorter than some past Dickstein dinners (but I didn't say that).

Lori Kalani

Partner

Dickstein Shapiro LLP

1825 Eye Street NW | Washington, DC 20006 Cell (703) 338-8753 | Office (202) 420-3139

<<mailto:KalaniL@dicksteinshapiro.com>> [KalaniL@dicksteinshapiro.com](mailto:KalaniL@dicksteinshapiro.com)

P.I.D. # 1830

HAND DELIVERED

**CONFIDENTIAL**  
**Form 9**

**QUARTERLY GIFT DISCLOSURE**  
**(GIFTS OVER \$100)**

COMMISSION ON ETHICS  
DATE RECEIVED  
MAR 26 2013

|   |              |                |  |  |
|---|--------------|----------------|--|--|
| LAST NAME - FIRST NAME - MIDDLE NAME<br>Bondi Pamela Jo |              |                | NAME OF AGENCY<br>Office of the Attorney General   |  |
| MAILING ADDRESS<br>PL-01 The Capitol                    |              |                | OFFICE OR POSITION HELD<br>Attorney General  |  |
| CITY<br>Tallahassee                                     | ZIP<br>32399 | COUNTY<br>Leon | FOR QUARTER ENDING (CHECK ONE)<br><input type="checkbox"/> MARCH <input type="checkbox"/> JUNE <input type="checkbox"/> SEPTEMBER <input checked="" type="checkbox"/> DECEMBER |  |
|   |              |                | YEAR<br>2013   |  |

**PART A - STATEMENT OF GIFTS**

Please list below each gift, the value of which you believe to exceed \$100, accepted by you during the calendar quarter for which this statement is being filed. You are required to describe the gift and state the monetary value of the gift, the name and address of the person making the gift, and the date(s) the gift was received. If any of these facts, other than the gift description, are unknown or not applicable, you should so state on the form. As explained more fully in the instructions on the reverse side of the form, you are not required to disclose gifts from relatives or certain other gifts. You are not required to file this statement for any calendar quarter during which you did not receive a reportable gift.

| DATE RECEIVED | DESCRIPTION OF GIFT                   | MONETARY VALUE | NAME OF PERSON MAKING THE GIFT        | ADDRESS OF PERSON MAKING THE GIFT                       |
|---------------|---------------------------------------|----------------|---------------------------------------|---|
| 10/22         | Flight to Tallahassee                 | \$400          | Columbia Collier Enterprises          | 568 9th St. S. Naples, FL 34102                         |
| 11/10 - 11/13 | Flight, hotel and food - RAGA Meeting | \$2,216.72     | Republican State Leadership Committee | 1201 F. St. NW. Suite 675 Washington, DC 20004          |
| 12/9          | Food & Beverage                       | \$100          | John Stross                           | 175 1st Street South Unit 3102 St. Petersburg, FL 33701 |
|               |                                       |                |                                       |   |

CHECK HERE IF CONTINUED ON SEPARATE SHEET

**PROCESSED**

**PART B - RECEIPT PROVIDED BY PERSON MAKING THE GIFT**

If any receipt for a gift listed above was provided to you by the person making the gift, you are required to attach a copy of that receipt to this form. You may attach an explanation of any differences between the information disclosed on this form and the information on the receipt.

CHECK HERE IF A RECEIPT IS ATTACHED TO THIS FORM

**PART C - OATH**

|   |  |
|---|--|
| I, the person whose name appears at the beginning of this form, do<br>depose on oath or affirmation and say that the information disclosed<br>herein and on any attachments made by me constitutes a true accurate,<br>and total listing of all gifts required to be reported by Section 112.3148,<br>Florida Statutes. | STATE OF FLORIDA<br>COUNTY OF <u>Leon</u>  |
|   | Sworn to (or affirmed) and subscribed before me this<br><u>25</u> day of <u>March</u> , 20 <u>13</u>   |
| by <u>Pam Bondi</u><br><u>Leslie H. Jacobs</u><br>(Signature of Notary Public-State of Florida)   | (Print, Type, or Stamp Commission # <u>12107379</u><br>Personally Known <input checked="" type="checkbox"/> OR Expires <u>June 30, 2018</u><br>Type of Identification <u>Notary Public</u> |
|   |  |
| <u>Pam Bondi</u><br>SIGNATURE OF REPORTING OFFICIAL   |  |

**PART D - FILING INSTRUCTIONS**

This form, when duly signed and notarized, must be filed with the Commission on Ethics, P.O. Drawer 15709, Tallahassee, Florida 32317-5709, physical address 3600 Maclay Blvd. South, Suite 201, Tallahassee, Florida 32312. The form must be filed no later than the last day of the calendar quarter that follows the calendar quarter for which this form is filed (For example, if a gift is received in March, it should be disclosed by June 30.)

## RAGA Fall National Meeting 11/10-11/13

Attorney General Bondi

Flight- \$1,005.90

Hotel- \$778.04

Food- \$432.78



# The Office of Attorney General Lori Swanson

Our Office ▶ Consumer ▶ Charities ▶ Resources ▶ Complaint Form Contact Us Scams ▶

Today is Monday, October 27, 2014

More about  
Attorney General  
[Lori Swanson](#)

## Press Release

Tuesday, July 31, 2012

### Consumer Links

AG Home  
Advice To Businesses  
Advice To Students  
Car Shop  
Conciliation Court  
Consumer Advice  
Fraud  
Health  
Housing  
Privacy and Identity Theft  
Senior Center  
Utilities and Telephone  
Veteran and Service

Members (PDF)

### Minnesota Attorney General's Office

1400 Bremer Tower  
445 Minnesota Street  
St. Paul, MN 55101

[\(651\) 296-3353](tel:(651)296-3353)  
[\(800\) 657-3787](tel:(800)657-3787)

M - F 8 am - 5 pm

TTY:(651) 297-7206  
TTY:(800) 366-4812

## ATTORNEY GENERAL SWANSON SAYS ACCRETIVE WILL CEASE OPERATIONS IN THE STATE OF MINNESOTA UNDER SETTLEMENT OF FEDERAL LAWSUIT

*Cannot Reenter Minnesota For Six Years Without Attorney General's Agreement*

Minnesota Attorney General Lori Swanson today announced that Accretive Health, Inc., the Chicago debt collector that managed the revenue operations of several Minnesota hospitals, will cease operations in the State of Minnesota under a settlement of her federal lawsuit against the company.

Under the settlement, Accretive must stop all business operations in the State of Minnesota within the next 90 days and cannot reenter the State of Minnesota for a period of six years without the agreement of the Attorney General. (The settlement requires Accretive to cease all operations in Minnesota within the next 90 days, or by November 1, 2012. The company will then be subject to an outright ban on operating in Minnesota for two years, after which, for the next four years, it can only reenter the State if the Attorney General agrees to a Consent Order regarding its business practices in the State.)

"A hospital emergency room is a place of medical trauma and emotional suffering for patients and their families. It should be a solemn place, not a place for a financial shakedown of patients. It is good to close the door on this disturbing chapter in Minnesota health care," said Attorney General Swanson.

The Attorney General's Office started to investigate Accretive for potential patient privacy violations last October, after an Accretive laptop containing data on over 23,000 patients of Fairview Health Services and North Memorial Health Care was stolen from the rental car of an Accretive employee. The investigation broadened after the Office learned that the company was engaged in debt collection from patients. The Attorney General first filed a lawsuit against Accretive in January, alleging that the company violated state and federal health privacy laws, and state debt collection laws. The lawsuit was later amended to include allegations that Accretive was responsible for aggressive collection practices in hospital emergency rooms by its employees and others acting under its management and supervision. The lawsuit alleged that Accretive imbedded its management into the staff of Minnesota hospitals and managed hospital employees engaged in collections and patient registration.

The Attorney General's Office obtained sworn affidavits from about 60 patients to support the lawsuit and heard from many others. Many of these patients say they were asked to pay money in the hospital emergency room before being treated, often while laying on a gurney, undressed, in pain, or hooked up to tubes or morphine. Most of the patients had insurance coverage. For example, the office obtained affidavits from:

- A mother who was taken from the side of her teenage daughter who tried to overdose on a bottle of pills, made to give a credit card in the middle of the night and pay \$500 before she could return to her daughter's bedside.
- A mother who had just given birth who was told that her newborn baby could not be discharged from the hospital unless she coughed up a credit card and paid \$800. As it turns out, the mother overpaid and had to fight for months to get the \$800 back.
- A pregnant mother who was asked to pay money in the emergency room in the midst of miscarrying her first baby.

Under the settlement, Accretive will pay about \$2.5 million to the State of Minnesota. The money will be part of a restitution fund used to compensate patients, with any funds remaining remitted to the state treasury. Accretive must also return to its client hospitals all data in its possession about Minnesota patients, and an independent auditor approved by the Attorney General must confirm that it has done so. Among other things, the lawsuit alleged that Accretive had lax privacy controls and accessed too much information about patients.



The Attorney General's Office does not have the authority to enforce a federal law called the Emergency Medical Treatment and Active Labor Act, or EMTALA. Under EMTALA, a hospital is supposed to examine a patient and, if an emergency exists, treat and stabilize the patient before asking for money. The Attorney General's Office has referred the patient affidavits to the U.S. Centers for Medicare and Medicaid Services, which enforces EMTALA. In addition, the Attorney General's Office has referred hospital employees and witnesses who have come forward from other states to appropriate regulators.

The settlement was filed with the United States District Court today and must be approved by the court.

The Attorney General recognized the efforts of the Minnesota Department of Commerce, which issued a cease and desist order against Accretive last January after the lawsuit was filed.

In Minnesota, Accretive did business at Fairview hospitals, North Memorial Hospital, and Maple Grove Hospital. If patients have questions or wish to file a claim for restitution, they may contact the Attorney General's Office as follows:

**Office of Minnesota Attorney General**

**Lori Swanson**

1400 Bremer Tower  
445 Minnesota Street  
St. Paul, MN 55101

[\(651\) 296-3353](tel:6512963353)

[\(800\) 657-3787](tel:8006573787)

TTY: [\(651\) 297-7206](tel:6512977206)

TTY: [\(800\) 366-4812](tel:8003664812)

Consumers who wish to file a claim for restitution may also [click here](#) to download a consumer report form and return it to the Attorney General's Office at the above address. **Claims for restitution must be post-marked and sent to the Attorney General's Office on or before October 31, 2012.**

"Nash, Bernard" <NashB@dicksteinshapiro.com>

4/25/2012 1:35:10 PM

To: "carlos.muniz@myfloridalegal.com" <carlos.muniz@myfloridalegal.com>

cc:

Subject: Ps call me/client matter

Cell 202 494 1178

Thanks

Bernard Nash

Partner

Dickstein Shapiro LLP

1825 Eye Street NW

Washington, DC 20006

Tel (202) 420.2209

To: 'Carlos Muniz' <Carlos.Muniz@myfloridalegal.com>

cc:

Subject: RE:

Carlos,

Thanks for getting back to me so quickly.

Best regards,

Milton

Visit our State AG Monitor blog

<http://www.stateagmonitor.com/>

From: Carlos Muniz [mailto:Carlos.Muniz@myfloridalegal.com]

Sent: Wednesday, April 25, 2012 2:49 PM

To: Marquis, Milton

Subject:

Milton,

Good talking with you. We've asked Renee to call you back and give you whatever information she can. If you'd still like to speak with me after you've talked with her, feel free to give me a call.

Best,

Carlos

Carlos Muniz

4/26/2012 9:27:52 AM

To: "Nash, Bernard" <NashB@dicksteinshapiro.com>

cc:

Subject: Re: Accretive Health

Ok--got it.

From: "Nash, Bernard" <NashB@dicksteinshapiro.com>

To: Carlos Muniz <carlos.muniz@myfloridalegal.com>

Date: 04/26/2012 05:58 AM

Subject: Accretive Health

Working with Sacred Heart, St Vincent Jacksonville.

Thanks

Bernard Nash

Partner

Dickstein Shapiro LLP

1825 Eye Street NW | Washington, DC 20006

Tel (202) 420.2209 | Direct Fax (202) 379.9353

nashb@dicksteinshapiro.com

### Consumer Protection Investigations and Litigation

We represented **DuPont** before the California AG under Proposition 65 (requiring warnings on carcinogenic products)—the AG did not sue.

Our team persuaded AGs not to sue **Wyeth** over its thimerosal-containing vaccines.

We resolved investigations by the Florida, Washington, and District of Columbia AGs regarding **AT&T's** marketing of roadside assistance.

We resolved lawsuits and investigations against national debt collection and debt buying companies by numerous AGs.

We persuaded AGs not to sue **Accretive Health** following the filing of a lawsuit by the Minnesota AG arising out of the theft of an unencrypted laptop.

Our team averted a lawsuit against **Duke Energy** by California and other western AGs regarding the alleged manipulation of electricity prices.

Our team resolved an investigation of **DISH Network** by the Washington AG.

We resolved numerous AG consumer protection and Medicaid fraud lawsuits alleging false drug price reporting on behalf of **Pfizer**.

We resolved a multistate investigation of prepaid phone card disclosures on behalf of **AT&T**.

### Federal Legislation

On behalf of **AT&T**, we persuaded 21 AGs to sign a letter to Senate leaders supporting the extension of the Foreign Intelligence Surveillance Act.

### Antitrust and Merger Clearance

We represented **AT&T** in obtaining antitrust clearances from 50 AGs for its SBC and Bell South acquisitions. We also represented AT&T in its attempted acquisition of T-Mobile, and obtained the support of 11 AGs.

Our attorneys obtained AG antitrust clearances of the **Pfizer-Pharmacia** and **Time Warner Cable-Adelphia** mergers.

### Antitrust Investigations

We persuaded AGs not to take antitrust action against **Pfizer** regarding its actions to prevent the illegal importation of medicines into the United States from Canada.

### Public Nuisance Suits

We developed and executed a strategy for **DuPont** in response to a bellwether AG lead paint public nuisance suit, which resulted in dismissal of all claims.

### State False Claims Acts

We represented **Lender Processing Services (LPS)** in numerous AG civil and criminal investigations of its mortgage-related practices, obtained dismissal of all criminal indictments, and negotiated a civil settlement with 49 AGs.

### Data Privacy and Information Security

We successfully represented numerous companies before AGs on data privacy matters, including conducting internal investigations and counseling on the legal, political, and public relations aspects of data breach incidents.

### Amicus Briefs

On behalf of **AT&T**, we secured the filing of AG *amicus* briefs in the *Twombly* and *LinkLine* Supreme Court antitrust cases.

Our attorneys secured the filing of an *amicus* brief by 40 AGs on behalf of the **Recording Industry Association of America** in the *Grokster* file-sharing Supreme Court case.

Our team secured the filing of *amicus* briefs by 23 AGs in *American Electric Power*, in which the Supreme Court limited public nuisance climate change claims.

We secured AG *amicus* support in the landmark Supreme Court case, **AT&T Mobility v. Concepcion**, in which the Court upheld the use of class action arbitration waivers in consumer arbitration clauses.



Number of former State AGs serving as U.S. Senators and Governors in 2014. State AGs frequently transition to more powerful leadership positions in government, and the relationships we build with them are lasting.

To keep current on AG issues, visit our blog, [stateagmonitor.com](http://stateagmonitor.com).



## 2013 Summer National Meeting

June 8-11 at The Grand Hotel  
286 Grand Avenue | Mackinac Island, Michigan | (906) 847-3331

### **Summer Meeting 2013 Travel Package** **(\$4,500)**

*\*This product is offered exclusively to RAGA Members in an effort to help reduce the number of travel arrangements required for this trip. With this package, you will have secured your flight, ground transportation, water transportation, luggage handling & hotel lodging. Spouse travel can be added to this package for \$2,000.*

- ✓ 1 Pass on a Chartered Boeing 737-800 with Attorneys General Sam Olens (GA), Tim Fox (MT), Jon Bruning (NE), Wayne Stenehjem (ND), Scott Pruitt (OK), Alan Wilson (SC), Pam Bondi (FL), & Luther Strange (AL) from Dulles International (IAD) departing 6/8/13 at 6:00PM to Pellston Regional Airport (2 hour flight time).

*\*Hot Meal and Beverages included.*

- ✓ Roundtrip Ground (MackinawShuttle.com) Transportation.
- ✓ Roundtrip Ferry Boat (SheplersFerry.com) Transportation.
- ✓ Upon arrival at the Grand Hotel you will be invited to attend Cynthia & Bill Schuette's Jewel in the Straits Welcome Cocktail Reception.
- ✓ All baggage handling through to your hotel room.
- ✓ 3 Nights (Saturday, Sunday and Monday) Lodging at the Grand Hotel.
- ✓ All taxes, charges and fees are included.
- ✓ 1 Pass on a Chartered Boeing 737-800 from Pellston Regional Airport departing 6/11/13 to Dulles International (Time tbd but estimated to be 12pm).
- ✓ The Package must be paid in full by April 30, 2013.
- ✓ The package is non-refundable but is transferrable to another qualified Member of RAGA.

**TOTAL AMOUNT DUE: \$4,500**

Please make check payable to: **Republican State Leadership Committee. Remit to:** Republican State Leadership Committee -1201 F Street, NW - Suite 675 Washington, DC 20004. If you have questions, please call Jessica Medeiros Garrison, RAGA Director, at (205) 568-4371 or [JGarrison@rslc.com](mailto:JGarrison@rslc.com). Feel free to use the RSLC's Overnight Carrier Account to deliver payment when it becomes available: (FedEx: 258824725, UPS: W86A25). **The tax ID# for the RSLC is 050532524.**

#### WIRING INSTRUCTIONS

**Account Name:** Republican State Leadership Committee , Corporate Dollars Account  
**Account Address:** 1201 F Street, NW, Suite 675, Washington, DC 20004  
**ABA #:** 254070116  
**Account #:** 15339203  
**Bank Name:** Citibank  
**Bank Contact:** Diana Booker (202) 638-0582

**Reserve your package online at [www.rslc.com/raga-travel-1](http://www.rslc.com/raga-travel-1)**

*Contributions or gifts to the Republican State Leadership Committee (RSLC) and its affiliated state PACs are not tax deductible. Contributions may be used for activities of the RSLC and its affiliated state PACs at the RSLC's sole discretion. The RSLC does not accept earmarked contributions. Contributions from foreign nationals are not solicited or permitted.*

1830

HAND DELIVERED COMMISSION ON ETHICS  
DATE RECEIVED

SEP 27 2013

**Form 9 QUARTERLY GIFT DISCLOSURE  
(GIFTS OVER \$100)**

|  |                      |                        |   |                     |
|--|----------------------|------------------------|---|---------------------|
| LAST NAME -- FIRST NAME -- MIDDLE NAME:<br><b>Bondi, Pamela Jo</b> |                      |                        | NAME OF AGENCY:<br><b>Office of the Attorney General-OLA</b>  |                     |
| MAILING ADDRESS:<br><b>PL-01 The Capitol</b>                       |                      |                        | OFFICE OR POSITION HELD:<br><b>Attorney General</b>   |                     |
| CITY:<br><b>Tallahassee</b>  | ZIP:<br><b>32399</b> | COUNTY:<br><b>Leon</b> | FOR QUARTER ENDING (CHECK ONE):<br><input type="checkbox"/> MARCH <input checked="" type="checkbox"/> JUNE <input type="checkbox"/> SEPTEMBER <input type="checkbox"/> DECEMBER |                     |
|  |                      |                        |   | YEAR<br><b>2013</b> |

**PART A — STATEMENT OF GIFTS**

**CONFIDENTIAL PROCESSED**

Please list below each gift, the value of which you believe to exceed \$100, accepted by you during the calendar quarter for which this statement is being filed. You are required to describe the gift and state the monetary value of the gift, the name and address of the person making the gift, and the date(s) the gift was received. If any of these facts, other than the gift description, are unknown or not applicable, you should so state on the form. As explained more fully in the instructions on the reverse side of the form, you are not required to disclose gifts from relatives or certain other gifts. You are not required to file this statement for any calendar quarter during which you did not receive a reportable gift.

| DATE RECEIVED   | DESCRIPTION OF GIFT                       | MONETARY VALUE  | NAME OF PERSON MAKING THE GIFT               | ADDRESS OF PERSON MAKING THE GIFT                           |
|-----------------|---|-----------------|--|---|
| <b>6/8-6/11</b> | <b>Flight, Hotel, food &amp; Beverage</b> | <b>2,393.99</b> | <b>Republican State Leadership Committee</b> | <b>1201 F. Street N.W. Suite 675 Washington, D.C. 20004</b> |
|                 |   |                 |  |   |
|                 |   |                 |  |   |
|                 |   |                 |  |   |

CHECK HERE IF CONTINUED ON SEPARATE SHEET

**PART B — RECEIPT PROVIDED BY PERSON MAKING THE GIFT**

If any receipt for a gift listed above was provided to you by the person making the gift, you are required to attach a copy of that receipt to this form. You may attach an explanation of any differences between the information disclosed on this form and the information on the receipt.

CHECK HERE IF A RECEIPT IS ATTACHED TO THIS FORM

**PART C — OATH**

I, the person whose name appears at the beginning of this form, do depose on oath or affirmation and say that the information disclosed herein and on any attachments made by me constitutes a true accurate, and total listing of all gifts required to be reported by Section 112.3148, Florida Statutes.

**Pam Bondi**  
SIGNATURE OF REPORTING OFFICIAL

STATE OF FLORIDA  
COUNTY OF **Leon**  
Sworn to (or affirmed) and subscribed before me this **26** day of **September**, 20**13**  
by **Pamela Jo Bondi**  
**Leslie H. Jacobs**  
(Signature of Notary Public-State of Florida)

(Print, Type, or Stamp Commissioned Name of Notary Public) **LESLIE H. JACOBS**  
Personally Known  OR  Not Personally Known  
Type of Identification Produced **CE 197379**  
**Expires 906, 2016**  
Bonded thru Troy Ewin Insurance 810-385-7019

**PART D — FILING INSTRUCTIONS**

This form, when duly signed and notarized, must be filed with the Commission on Ethics, P.O. Drawer 15709, Tallahassee, Florida 32317-5709; physical address: 3600 Maclay Blvd. South, Suite 201, Tallahassee, Florida 32312. The form must be filed no later than the last day of the calendar quarter that follows the calendar quarter for which this form is filed (For example, if a gift is received in March, it should be disclosed by June 30.)

## RAGA Summer Meeting 6/8-6/11

Attorney General Pam Bondi

Flight- \$623.80

Hotel- \$1,327.56

Food & Beverage- \$442.63



-----Original Message-----

From: Carlos Muniz [mailto:Carlos.Muniz@myfloridalegal.com]

Sent: Tuesday, November 20, 2012 9:08 AM

To: Smoyer, Divonne

Subject: Follow up

Hey there--hope all's well.

Does Tuesday at 3:00 work for you?

Please note that Florida has a broad public records law, and that all correspondence to me via email may be subject to disclosure.

"Smoyer, Divonne" <SmoyerD@dicksteinshapiro.com>

11/20/2012 10:07:38 AM

To: 'Carlos Muniz' <Carlos.Muniz@myfloridalegal.com>

cc:

Subject: RE: Follow up

Perfect. How about at the 330 Bar in the hotel? It is just off the lobby and around the corner from the Caribbean Ballroom, which is where the location of the NAAG plenary sessions.

I think you have my cell, but here it is again: (202) 600-6870.

Also, have a great Thanksgiving!

Divonne Smoyer

Partner

Dickstein Shapiro LLP

1825 Eye Street NW | Washington, DC 20006

Tel (202) 420-2665 | Fax (202) 379-9256

smoyerd@dicksteinshapiro.com

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-----Original Message-----

From: Trish Conners [mailto:Trish.Conners@myfloridalegal.com]  
Sent: Monday, September 24, 2012 2:32 PM  
To: Marquis, Milton  
Subject: Re: LIBOR

My number at the Capitol is 850-245-0178--just got a message from the Collins Bldg that you are trying to reach me. Couldn't tell if it was before or after I responded to your e-mail....

From: "Marquis, Milton" <MarquisM@dicksteinshapiro.com>  
To: Trish Conners <trish\_conners@oag.state.fl.us>  
Date: 09/24/2012 02:16 PM  
Subject: LIBOR

Hello Trish,

Just following up on a call you had with Bernie regarding LIBOR. I understand from him that your office is willing to meet with our team. I was calling to see whether you all are available next week, preferably the beginning of the week.



**RE: LIBOR**

Trish Conners to: Marquis, Milton  
Cc: Greg Slemp, Laura Daugherty, Scott Palmer, Leslie Jacobs

09/26/2012 02:48 PM

We've gone ahead and reserved the Capitol conference room, so let's keep the location there. Thx. See you next week. T

"Marquis, Milton"

Hello Trish, I can now confirm the meeting at 1 p...

09/26/2012 02:47:16 PM

From: "Marquis, Milton" <MarquisM@dicksteinshapiro.com>  
To: Trish Conners <Trish.Conners@myfloridalegal.com>  
Cc: Scott Palmer <Scott.Palmer@myfloridalegal.com>, Laura Daugherty <Laura.Daugherty@myfloridalegal.com>, Greg Slemp <Greg.Slemp@myfloridalegal.com>  
Date: 09/26/2012 02:47 PM  
Subject: RE: LIBOR

Hello Trish,

I can now confirm the meeting at 1 pm Wed., Oct. 3. Please let me know the location of the meeting. Thanks.

Milton

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[www.stateagmonitor.com](http://www.stateagmonitor.com)

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-----Original Message-----

From: Trish Conners [<mailto:Trish.Conners@myfloridalegal.com>]  
Sent: Monday, September 24, 2012 8:44 PM  
To: Marquis, Milton  
Cc: Scott Palmer; Laura Daugherty; Greg Slemp  
Subject: Re: LIBOR

Sure. Leslie, can u calendar tentatively and grab our conference room for 1 pm next W with Milton Marquis, et al from Dickstein, Shapiro? Thx. T  
Florida Office of the Attorney General

----- Original Message -----



**Re: Greetings**  
Marquis, Milton to: Trish Conners

04/11/2013 11:32 AM

Sorry I got tied up after the AG enforcers session. Do you have a few minutes now or after the Chair Showcase? Thanks.

Sent from my iPhone

On Apr 11, 2013, at 8:50 AM, "Trish Conners"  
<Trish.Conners@myfloridalegal.com> wrote:

> Hello! Should be!  
> Florida Office of the Attorney General  
>  
>  
>  
> Visit our State AG Monitor blog  
> [www.stateagmonitor.com](http://www.stateagmonitor.com)

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[www.DicksteinShapiro.com](http://www.DicksteinShapiro.com)

----- Original Message -----

> From: "Marquis, Milton" [[MarquisM@dicksteinshapiro.com](mailto:MarquisM@dicksteinshapiro.com)]  
> Sent: 04/11/2013 08:47 AM AST  
> To: Trish Conners  
> Subject: Greetings

>  
>  
>

> Hello Trish,

>  
> Good to see you. You around this morning for a few minutes to discuss an issue? Thanks.

>

> Sent from my iPhone

>

> Visit our State AG Monitor blog  
> [www.stateagmonitor.com](http://www.stateagmonitor.com)

>

>

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**From: "Kalani, Lori" <KalaniL@dicksteinshapiro.com>**  
To: Jennifer Meale <Jennifer.Meale@myfloridalegal.com>  
Date: 04/16/2013 03:00 PM  
Subject: Re: Facebook and Cyber education

I will have proposed dates and times for the Inside Counsel interview no later than tomorrow COB. I just sent an email regarding Facebook, introducing you to Will Castleberry. He is the best! Between the two of us, we will make this happen.

**On Apr 16, 2013, at 1:49 PM, "Jennifer Meale" <Jennifer.Meale@myfloridalegal.com> wrote:**

Hi Lori,  
It was nice speaking with you today.

I'm checking to see when we may be able to get Inside Counsel down here for an in-person interview with Attorney General Bondi and a photo shoot in late April or early May, and I'll let you know ASAP. Also, I wanted to give you a basic idea of what we were hoping to do with Facebook. One of Attorney General Bondi's top priorities is fighting human trafficking. We currently offer cyber safety classes to middle and high schoolers throughout Florida. We'd like to partner with Facebook to dedicate a short portion of the overall cyber safety presentation to raising awareness about people soliciting victims (for sex trafficking) on social media sites.

We are completely flexible on the approach to accomplish this goal. We currently use a simple PowerPoint for the cyber safety. I was thinking that we could work with Facebook on a few tips and slides in the overall presentation--and/or create a short video--and then jointly do the presentation at a high school in Florida. I also like your idea of having a parent town hall meeting later that evening for families and more of a community event.

Please let me know your thoughts and if you need anything else.  
Best regards,  
Jenn

Jenn Meale  
Communications Director  
Office of Attorney General Pam Bondi  
The Capitol, Suite PL-01  
Tallahassee, Fla. 32399-1050  
850-245-0150 (main)  
850-294-7294 (cell)

**From: "Kalani, Lori" <KalaniL@dicksteinshapiro.com>**  
To: Jennifer Meale <Jennifer.Meale@myfloridalegal.com>  
Date: 04/17/2013 08:56 AM  
Subject: Re: Facebook and Cyber education

---

Hi. I talked to the publisher yesterday and he asked that you give me Pam's best times and dates, as he wants to make every effort to accommodate her. They would like to do the interview by end of April.

On Apr 17, 2013, at 8:36 AM, "Jennifer Meale" <Jennifer.Meale@myfloridalegal.com> wrote:

Thanks so much!

Jenn Meale  
Communications Director  
Office of Attorney General Pam Bondi  
The Capitol, Suite PL-01  
Tallahassee, Fla. 32399-1050  
850-245-0150 (main)  
850-294-7294 (cell)

# Talking with Florida Attorney General Pam Bondi about collaboration

Working with other AGs, federal authorities and the private sector is key to an AG's job

BY MELISSA MALESKE  
JULY 1, 2013



Read *InsideCounsel's* cover story on [how to work with attorneys general](#).

Pam Bondi, Florida's attorney general since January 2011, spoke to *InsideCounsel* about how her office has collaborated with other AGs, federal authorities and the private sector to tackle some of Florida's most pressing problems:



## On addressing Florida's prescription drug problem:

I was a prosecutor from Tampa, an assistant state attorney for 18 years, and I had never run for office before. In my general election I ran against two state senators, and I ended up hiring one of the Democrats to run my pill mills initiative. I didn't like the direction our state was going. Pill mills were opening up in strip malls everywhere. If you saw one of these doctors, they were just sitting in the back signing prescription pads all day. One of my first priorities when I was elected was to pass legislation to address pill mills.

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"Smoyer, Divonne" <SmoyerD@dicksteinshapiro.com>

6/17/2013 1:03:55 PM

To: "'carlos.muniz@myfloridalegal.com'" <carlos.muniz@myfloridalegal.com>

cc:

Subject: Hello!

Hi Carlos -- are you here in Boston yet? Do you have time for a 10-15 min mtg before the SAGE reception tonight?

Visit our State AG Monitor blog

[www.stateagmonitor.com](http://www.stateagmonitor.com)



**Information for October 11 Herbalife Meeting in Tampa**

**Lundahl, Emily** to: Catherine Crutcher  
(cate.crutcher@myfloridalegal.com)

10/03/2013 03:50 PM

---

History: This message has been forwarded.

---

Cate:

I was just about to email you when your email about the one pager came through. I do not have a one pager but the information below should help.

I am confirming the meeting with Herbalife [on Friday, October 11th](#) at 9am in your Tampa offices.

Lori will be joined by Brett Chapman, Chief Legal Officer, and John DeSimone, Chief Financial Officer, who will make the presentation on behalf of their company. Brett Chapman's bio can be viewed at: <http://www.herbalifebios.com/brett-r-chapman>. John DeSimone's can be viewed at: <http://www.herbalifebios.com/John-DeSimone>

Herbalife is a publically traded company that manufactures and sells products encouraging a healthy lifestyle. They utilize multi-level marketing as a means of direct sales to consumers. This year, the company has been the subject of an aggressive hedge fund short play. As part of the hedge fund's strategy to impact the stock price, certain short investors have been seeking regulatory intervention about certain aspects of Herbalife's business model.

Mr. Chapman and Mr. DeSimone will be prepared to discuss how Herbalife operates its business and will be prepared to answer any questions the AG and staff may have.

Thank you again for all of your help.



**RE: September 10**  
**Kalani, Lori** to: Catherine Crutcher

08/28/2013 11:31 AM

---

History:

This message has been replied to.

---

Hi Cate:

Good morning. The company is Herbalife. Would it be possible to squeeze in an Herbalife meeting in Tallahassee on the same day that we have the Verimed meeting? We are scheduled for September 25 at 4pm with Verimed. Would slightly before or after work for an Herbalife meeting?

**Lori E. Kalani**

Partner

Dickstein Shapiro LLP

(202) 420-3139

KalaniL@dicksteinshapiro.com

**rrussell@nmag.gov**

---

**From:** Lama, Albert <alama@nmag.gov>  
**Sent:** Wednesday, October 23, 2013 12:12 PM  
**To:** Kelly, JB  
**Subject:** Re: Herbalife Meeting Nov 4

Happy to do it. It will be good to see you. Have your client bring me a herbalife weight loss kit... I have put on a few pounds, LOL just kidding..

On Wed, Oct 23, 2013 at 10:11 AM, Kelly, JB <[KellyJB@dicksteinshapiro.com](mailto:KellyJB@dicksteinshapiro.com)> wrote:

Al:

Thank you for agreeing to meet with our client Herbalife on Monday November 4 at 3:00 in your Santa Fe office.

We will have Brett Chapman, Chief Legal Officer and John DeSimone, Chief Financial Officer make the presentation on behalf of their company. Brett's bio is here: <http://www.herbalifebios.com/brett-r-chapman>. John's bio is here: <http://www.herbalifebios.com/John-DeSimone> If Herbalife has additional representatives attending, I will let you know.

Herbalife is a publically traded company that manufactures and sells products encouraging a healthy lifestyle. They utilize multi-level marketing as a means of direct sales to consumers. This year, the company has been the subject of an aggressive hedge fund short play. As part of the hedge fund's strategy to impact the stock price, certain short investors have been seeking regulatory intervention about certain aspects of Herbalife's business model. It is my understanding that one particular hedge fund, Pershing Square run by Bill Ackman, has met with several Attorneys General to advocate for his position.

Mr. Chapman and Mr. DeSimone will be prepared to discuss how Herbalife operates its business and will be prepared to answer any questions you and your staff may have.

Thanks again Al. Please bring any other staff you think should attend. Hopefully General King can make all or part of the presentation. Let me know if there is anything else you need.

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**From:** Bistrow, Rick  
**Sent:** Monday, October 28, 2013 12:02 PM  
**To:** Kelly, JB  
**Subject:** RE: Herbalife follow up

JB—I will get back to you shortly. Rick

---

**From:** Kelly, JB  
**Sent:** Monday, October 28, 2013 6:20 AM  
**To:** Bistrow, Rick;  
**Subject:** Herbalife follow up

Hi Rick:

I was following up on my voice mail of last week. We represent Herbalife, a publically traded company that sells products consistent with a healthy life style. Herbalife is the subject of a hedge fund short play where the hedge fund has accused Herbalife of various marketing irregularities. The company has been meeting with a number of Attorneys General and staff and I was hoping we could make a presentation to your office on the morning of November 6. I would bring the Chief Legal Officer and the Chief Financial Officer.

Please let me know if such a meeting is possible.

Thanks Rick. Hope all is well.

JB Kelly



**Re: Follow-up**  
Trish Conners to: Kalani, Lori

02/14/2013 02:38 PM

thx

"Kalani, Lori" Trish: Thanks for the call earlier today. FYI, in th... 02/14/2013 01:49:39 PM

From: "Kalani, Lori" <KalaniL@dicksteinshapiro.com>  
To: "trish.conners@myfloridalegal.com" <trish.conners@myfloridalegal.com>  
Date: 02/14/2013 01:49 PM  
Subject: Follow-up

Trish:

Thanks for the call earlier today. FYI, in the last 10 months 4 Florida trial courts have granted summary judgments in favor of the Online Travel Companies. I have listed the cases below. Talk to you soon.

*Leon County, et al. v. Expedia.com, et al.* , No. 09CA4319 (Fla. 2d Jud. Cir. Ct. April 19, 2012)

*Orange County v. Expedia, Inc.* , No. 2006-CA-2104 (Fla. 9th Jud. Cir. Ct. June 22, 2012)

*Orbitz, LLC, et al, v. Broward County* , No. CA-126 (Fla. 2d Jud. Cir. Ct. July 13, 2012)

*Leon County v. Expedia, Inc.* , et al., No. 2009 CA 4882 (Fla. 2d Jud. Cir. Ct. Sept. 25, 2012).

**Lori E. Kalani**

Partner

Dickstein Shapiro LLP

1825 I Street, NW, Washington, DC 20006

(202) 420-3139 office

**BERNIE NASH, LORI KALANI, MILTON MARQUIS,  
DIVONNE SMOYER, JB KELLY & CHRIS TAMPIO**

cordially invite you to attend

Dickstein Shapiro's  
29<sup>th</sup> NAAG Spring Meeting Dinner

**Tuesday, February 26, 2013**

(following the NAAG Supreme Court Reception)

7:00 PM: Cocktails      8:00 PM: Dinner

**Tosca**

1112 F Street NW | Washington, DC

Transportation will be provided outside  
the Supreme Court starting at 6:30 PM

**DICKSTEINSHAPIRO**<sub>LLP</sub>

Kindly RSVP to:

Emily Lundahl at (202) 420-3304 | [lundahle@dicksteinshapiro.com](mailto:lundahle@dicksteinshapiro.com)

**37 2009 CA 004303 - DEPT OF LEGAL AFFAIRS OFFICE OF THE ATTORNEY GENER vs EXPEDIA INC**

| Status | Party  | Party Code | Attorney |
|--------|--|------------|----------|
|        | ORBITZ INC ,   | DEFENDANT  |          |
|        | ORBITZ LLC ,   | DEFENDANT  |          |
|        | HOTELS COM LP ,                                      | DEFENDANT  |          |
|        | TRAVELOCITY COM LP ,                                 | DEFENDANT  |          |
|        | DELAWARE HOT WIRE INC ,                              | DEFENDANT  |          |
|        | TRAVELWEB LLC ,                                      | DEFENDANT  |          |
|        | PRICE LINE COM INC ,                                 | DEFENDANT  |          |
|        | SITE59 COM LLC ,                                     | DEFENDANT  |          |
|        | DEPT OF LEGAL AFFAIRS OFFICE OF THE ATTORNEY GENER , | PLAINTIFF  |          |
|        | EXPEDIA INC ,  | DEFENDANT  |          |
|        | TRIP NETWORK INC ,                                   | DEFENDANT  |          |



|           |        |   |  |  |        |        |    |
|-----------|--------|---|--|--|--------|--------|----|
| 2/1/2012  | CO1_CA | COPIES RECEIPT: 603811 DATE: 02/01/2012 |  |  | \$0.00 | \$0.00 | BM |
| 5/10/2012 | CO1_CA | COPIES RECEIPT: 645283 DATE: 05/10/2012 |  |  | \$0.00 | \$0.00 | BM |
| 1/23/2013 | NOIN   | NOTICE OF INTENT TO DISMISS             |  |  | \$0.00 | \$0.00 | BM |
| 1/30/2013 | CO1_CA | COPIES RECEIPT: 742402 DATE: 01/30/2013 |  |  | \$0.00 | \$0.00 | BM |
| 4/8/2013  | NVD    | NOTICE OF VOLUNTARY DISMISSAL           |  |  | \$0.00 | \$0.00 | BM |
| 4/10/2013 | CO1_CA | COPIES RECEIPT: 774610 DATE: 04/10/2013 |  |  | \$0.00 | \$0.00 | BM |

[Top of Page](#)

| Event | Date | Start | Location | Judge | Result | Source |
|-------|------|-------|----------|-------|--------|--------|
|       |      |       |          |       |        |        |

114054737.txt

"Tampio, Christopher" <TampioC@dicksteinshapiro.com>  
7/17/2013 5:48:07 PM

To: 'Carlos Muniz' <Carlos.Muniz@myfloridalegal.com>  
CC:

Subject: RE: Preventing Abuse of Cough Treatments Act of 2013

Great.

would you consider joining us on a short tour Sunday at 3:30 of a nearby university campus?

Van leaves from of the front door of the Broodmore at 3:30 and we would have you back at 4:45?

I wanted to invite the AG but you mentioned he booked schedule.

I can send you the details?

Chris

Visit our State AG Monitor blog  
<http://www.stateagmonitor.com/>

114054737.txt

Inactive hide details for "Tampio, Christopher" ---07/17/2013 05:40:39 PM---I appreciate the update. I think the KY AGs office "Tampio, Christopher" ---07/17/2013 05:40:39 PM---I appreciate the update. I think the KY AGs office would be willing to co-author an AG letter to Con

From: "Tampio, Christopher" <TampioC@dicksteinshapiro.com>  
To: 'Carlos Muniz' <Carlos.Muniz@myfloridalegal.com>  
Date: 07/17/2013 05:40 PM  
Subject: RE: Preventing Abuse of Cough Treatments Act of 2013

I appreciate the update.

I think the KY AGs office would be willing to co-author an AG letter to Congress.

They told me to check with Florida and get back to them.

I will causally mention this issue to AG Bondi when I see her at the CWAG event in CO.

Visit our State AG Monitor blog  
<http://www.stateagmonitor.com/>

114054737.txt

Matt,

I received your contact information from Carlos Muniz.

Are you available to discuss a federal bill that would to restrict access to cough medicine by minors (dextromethorphan), the key ingredient in the most popular over-the-counter (OTC) cold and cough remedies?

The bill is right in the “wheel house” of support from the FL and KY AG offices for you leading roles in combating drug abuse – especially with kids/teens?

Industry supports the efforts as well.


When are you free for me to give you call – and what is the best number to reach you?

All the best.

Chris

Chris Tampio  
Senior Advisor  
Dickstein Shapiro LLP  
Tel (202) 420-2708  
tampioc@dicksteinshapiro.com

Visit our State AG Monitor blog  
<http://www.stateagmonitor.com/>



**BERNIE NASH, MILTON MARQUIS, LORI KALANI,  
JB KELLY, DIVONNE SMOYER, AND CHRIS TAMPIO**  
cordially invite you to attend

Dickstein Shapiro's  
**CWAG Summer Meeting Dinner**

**Tuesday, July 23, 2013**

6:15 PM: Cocktails 7:00 PM: Dinner

**The Penrose Room**  
The Broadmoor, 1 Lake Avenue  
Colorado Springs, CO 80906

**DICKSTEINSHAPIRO** LLP

Kindly RSVP by Friday, July 19

Emily Lundahl

(202) 420-3304

[lundahl@dicksteinshapiro.com](mailto:lundahl@ dicksteinshapiro.com)



Re: CWAG Summer Meeting Dinner - Tuesday, July 23, 6:15 pm. 📎

Catherine Crutcher to: Nash, Bernard

05/21/2013 12:39 PM

Good afternoon,

Thank you for the invitation!

Unfortunately, Attorney General Bondi will not be able to attend the dinner.

Have a great week.

Catherine Anne Crutcher  
Senior Executive Assistant to Attorney General Pam Bondi  
PL-01 The Capitol  
Tallahassee, FL 32399  
(850)245-0140

"Nash, Bernard"

Pam - I hope you will join us for dinner. Bernie

05/17/2013 03:57:03 PM

From: "Nash, Bernard" <NashB@dicksteinshapiro.com>  
To: "pam.bondi@myfloridalegal.com" <pam.bondi@myfloridalegal.com>  
Cc: "cate.crutcher@myfloridalegal.com" <cate.crutcher@myfloridalegal.com>  
Date: 05/17/2013 03:57 PM  
Subject: CWAG Summer Meeting Dinner - Tuesday, July 23, 6:15 pm

Pam – I hope you will join us for dinner.

Bernie

**Bernard Nash**

Partner

Dickstein Shapiro LLP

1825 Eye Street NW | Washington, DC 20006

Tel (202) 420.2209 | Direct Fax (202) 379.9353

[nashb@dicksteinshapiro.com](mailto:nashb@dicksteinshapiro.com)

PROCESSED

Confidential

HAND DELIVERED

#1830

COMMISSION ON ETHICS

DATE RECEIVED

DEC 27 2013

Form 9

QUARTERLY GIFT DISCLOSURE  
(GIFTS OVER \$100)

LAST NAME -- FIRST NAME -- MIDDLE NAME:

Bondi Pamela Jo

NAME OF AGENCY:

Office of the Attorney General-DLA

MAILING ADDRESS:

PL-01 The Capitol

OFFICE OR POSITION HELD:

Attorney General

CITY:

ZIP:

COUNTY:

Tallahassee 32399 Leon

FOR QUARTER ENDING (CHECK ONE):

YEAR

MARCH  JUNE  SEPTEMBER  DECEMBER

2013

PART A — STATEMENT OF GIFTS

Please list below each gift, the value of which you believe to exceed \$100, accepted by you during the calendar quarter for which this statement is being filed. You are required to describe the gift and state the monetary value of the gift, the name and address of the person making the gift, and the date(s) the gift was received. If any of these facts, other than the gift description, are unknown or not applicable, you should so state on the form. As explained more fully in the instructions on the reverse side of the form, you are not required to disclose gifts from relatives or certain other gifts. You are not required to file this statement for any calendar quarter during which you did not receive a reportable gift.

| DATE RECEIVED | DESCRIPTION OF GIFT            | MONETARY VALUE | NAME OF PERSON MAKING THE GIFT        | ADDRESS OF PERSON MAKING THE GIFT              |
|---------------|--------------------------------|----------------|---------------------------------------|--|
| 8/1-8/4       | Flight, hotel, food & beverage | 2,898.03       | Republican State Leadership Committee | 1301 F St. NW Suite 675 Washington, DC 20004   |
| 9/9-9/10      | Flight, hotel, food & beverage | 1,997.52       | Republican State Leadership Committee | 1301 F St. NW Suite 675 Washington, D.C. 20004 |
|               |                                |                |                                       |  |
|               |                                |                |                                       |  |

CHECK HERE IF CONTINUED ON SEPARATE SHEET

PART B — RECEIPT PROVIDED BY PERSON MAKING THE GIFT

If any receipt for a gift listed above was provided to you by the person making the gift, you are required to attach a copy of that receipt to this form. You may attach an explanation of any differences between the information disclosed on this form and the information on the receipt.

CHECK HERE IF A RECEIPT IS ATTACHED TO THIS FORM

PART C — OATH

I, the person whose name appears at the beginning of this form, do depose on oath or affirmation and say that the information disclosed herein and on any attachments made by me constitutes a true accurate, and total listing of all gifts required to be reported by Section 112.3148,

Florida Statutes.

Pam Bondi  
SIGNATURE OF REPORTING OFFICIAL

STATE OF FLORIDA

COUNTY OF Leon

Sworn to (or affirmed) and subscribed before me this 19th day of December, 2013

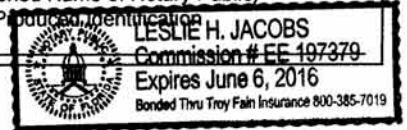
by Pam Bondi

Leslie H. Jacobs  
(Signature of Notary Public-State of Florida)

(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known  OR Produced Identification

Type of Identification Produced



PART D — FILING INSTRUCTIONS

This form, when duly signed and notarized, must be filed with the Commission on Ethics, P.O. Drawer 15709, Tallahassee, Florida 32317-5709; physical address: 325 John Knox Road, Building E, Suite 200, Tallahassee, Florida 32303. The form must be filed no later than the last day of the calendar quarter that follows the calendar quarter for which this form is filed (For example, if a gift is received in March, it should be disclosed by June 30.)

RAGA ERC Retreat 8/1-8/4, 2013

Attorney General Pam Bondi

Flight- \$769.80

Hotel- \$1,725.00

Food & Beverage- \$403.23





Re: Fw: Invitation to Pfizer's Kendall Square Attorneys General Tour --  
Thursday a.m., June 20

Catherine Crutcher to: SmoyerD

06/05/2013 10:17 AM

Good morning,

Unfortunately, the Attorney General will not be available for this tour. If anything changes we will let you know.

Have a great week!

Catherine Anne Crutcher  
Senior Executive Assistant to Attorney General Pam Bondi  
PL-01 The Capitol  
Tallahassee, FL 32399  
(850)245-0140

Carlos Muniz

----- Forwarded by Carlos Muniz/OAG on 06/05/...

06/05/2013 10:03:43 AM

From: Carlos Muniz/OAG  
To: Catherine Crutcher/OAG@OAG  
Date: 06/05/2013 10:03 AM  
Subject: Fw: Invitation to Pfizer's Kendall Square Attorneys General Tour -- Thursday a.m., June 20

----- Forwarded by Carlos Muniz/OAG on 06/05/2013 10:03 AM -----

From: "Smoyer, Divonne" <SmoyerD@dicksteinshapiro.com>  
To: "kathy.krutcher@myfloridalegal.com" <kathy.krutcher@myfloridalegal.com>  
Cc: 'Carlos Muniz' <Carlos.Muniz@myfloridalegal.com>  
Date: 06/05/2013 09:54 AM  
Subject: Invitation to Pfizer's Kendall Square Attorneys General Tour -- Thursday a.m., June 20

Dear Kathy (and Carlos) –

I write to follow up on the below invitation from Pfizer to General Bondi.

My colleagues at Pfizer and I look forward to seeing both the Attorney General and Carlos at the NAAG meeting in Boston in two weeks, and we would be delighted if they would be able to join us for a tour of Pfizer's research facility near MIT on the morning of Thursday, June 20 after the close of the NAAG meeting. More details of the tour are on the enclosed briefing sheet.

When convenient, please let me know if we can expect the pleasure of their company.

Many thanks and kind regards,

Divonne Smoyer

**Divonne Smoyer**

Partner

Dickstein Shapiro LLP

1825 Eye Street NW | Washington, DC 20006

Tel (202) 420-2665 | Fax (202) 379-9256

[smoyerd@dicksteinshapiro.com](mailto:smoyerd@dicksteinshapiro.com)

Dear General Bondi:

We write to invite you on a tour of Pfizer's Kendall Square research and development facility in Cambridge, Massachusetts, the morning of June 20, 2013, after the conclusion of the NAAG Summer Meeting in Boston.

The Kendall Square facility houses Pfizer's Neuroscience Research Unit, which is conducting cutting-edge research on the treatment of a variety of conditions, including Alzheimer's and Parkinson's diseases. During the tour, Pfizer will provide a walkthrough of its labs and a presentation from Michael Ehlers, the Chief Scientific Officer of the Neuroscience Research Unit, regarding the work of the Unit and Pfizer's R&D process and pipeline. Pfizer also will provide you with an overview of its anti-counterfeiting efforts, presented by its global security division, as well as a discussion of the rigorous controls Pfizer has in place to comply with state and federal laws, presented by its compliance division.

Pfizer will arrange for transportation to the Kendall Square facility from the Westin Copley at 7:30 a.m., with return transportation at 10:00 a.m. Light breakfast will be served. For additional information, please see the attached flyer.

If you are interested in attending, please contact Divonne Smoyer by June 13, 2013 at (202) 420-2665 or

[smoyerd@dicksteinshapiro.com](mailto:smoyerd@dicksteinshapiro.com). Your staff members in attendance at NAAG are welcome to attend as well.

With appreciation for your consideration,  
Markus Green and Robert Jones

---

**UNITED STATES**  
**SECURITIES AND EXCHANGE COMMISSION**

Washington, D.C. 20549

**FORM 8-K**

**CURRENT REPORT**

**Pursuant to Section 13 or 15(d) of The Securities Exchange Act of 1934**

Date of Report (Date of earliest event reported): **May 18, 2011**

**BRIDGEPOINT EDUCATION, INC.**

(Exact name of registrant as specified in its charter)

**Item 8.01. Other Information.**

On May 18, 2011, we received from the Attorney General of the State of New York (“Attorney General”) a Subpoena Duces Tecum (“Subpoena”) relating to the Attorney General’s investigation of whether we and our academic institutions have complied with certain New York state consumer protection, securities and finance laws. Pursuant to the Subpoena, the Attorney General has requested from us and our academic institutions documents and detailed information for the time period March 17, 2005, to present. We are evaluating the Subpoena and intend to comply with the Attorney General’s request.

**SIGNATURES**

Pursuant to the requirements of the Securities Exchange Act of 1934, as amended, the registrant has duly caused this report to be signed on its behalf by the undersigned hereunto duly authorized.

Date: May 19, 2011

**Bridgepoint Education, Inc.**

By: /s/ Daniel J. Devine

Name: Daniel J. Devine

Title: Chief Financial Officer

**Item 8.01 Other Information.**

On July 21, 2014, Bridgepoint Education, Inc. (the “Company”) and Ashford University received from the Attorney General of the State of Massachusetts (“Attorney General”) a Civil Investigative Demand relating to the Attorney General's investigation of for-profit educational institutions and whether the university's business practices complied with Massachusetts consumer protection laws. Pursuant to the Investigative Demand, the Attorney General has requested from the Company and Ashford University Massachusetts student information and complaints for the time period January 1, 2006, to present. The Company and the university are evaluating the Investigative Demand and intend to comply with the Attorney General's request.

On July 22, 2014, the Company received from the U.S. Securities & Exchange Commission (“SEC”) a subpoena relating to certain of the Company’s accounting practices, including revenue recognition, receivables and other matters relating to the Company’s previously disclosed intention to restate its financial statements for fiscal year ended December 31, 2013 and revise its financial statements for the years ended December 31, 2011 and 2012, and the prior revision of the Company’s financial statements for fiscal year ended December 31, 2012. Pursuant to the subpoena, the SEC has requested from the Company documents and detailed information for the time period January 1, 2009, to present. The Company is evaluating the subpoena and intends to fully cooperate in the investigation.

**SIGNATURES**

Pursuant to the requirements of the Securities Exchange Act of 1934, as amended, the registrant has duly caused this report to be signed on its behalf by the undersigned hereunto duly authorized.

Date: July 25, 2014

**Bridgepoint Education, Inc.**

By: \_\_\_\_\_  
/s/ Andrew S. Clark

Name: Andrew S. Clark

Title: Chief Executive Officer and President

**Item 8.01. Other Information.**

On September 30, 2011, Ashford University received from the Attorney General of the State of North Carolina (“Attorney General”) an Investigative Demand relating to the Attorney General's investigation of whether the university's business practices complied with North Carolina consumer protection law. Pursuant to the Investigative Demand, the Attorney General has requested from Ashford University documents and detailed information for the time period January 1, 2008, to present. The university is evaluating the Investigative Demand and intends to comply with the Attorney General's request.

---

## ASSURANCE OF VOLUNTARY COMPLIANCE

---

**In the matter of:**

**BRIDGEPOINT EDUCATION, INC.,  
A Delaware Corporation**

**and**

**ASHFORD UNIVERSITY, L.L.C.  
A California Limited Liability Company**

---

### **INTRODUCTION**

This Assurance of Voluntary Compliance (“AVC” or “Assurance”) is entered into between the State of Iowa, by Attorney General Thomas J. Miller, and Bridgepoint Education, Inc., (“Bridgepoint” or “BPI”) and its wholly owned subsidiary, Ashford University L.L.C. (“Ashford”) (collectively “Respondents”).

This AVC resolves the State of Iowa’s concerns regarding Respondents’ compliance with the Iowa Consumer Fraud Act, Iowa Code § 714.16 (2013) (“Consumer Fraud Act”), and particularly with respect to Ashford’s recruitment and enrollment practices and certain post-enrollment practices.

Respondents are entering into this Assurance solely for the purpose of settlement and nothing contained herein shall constitute or may be construed as an admission or concession of any violation of law, or of any other matter of fact or law, or of any liability or wrongdoing, all of which Respondents expressly deny.

### **PARTIES**

1. The State of Iowa, through Attorney General Thomas J. Miller, is specifically authorized to enforce the Consumer Fraud Act.

2. Bridgepoint is a Delaware corporation with corporate headquarters at 13500 Evening Creek Drive North, Suite 600, San Diego, California. It was founded in 1999.

3. Ashford is a limited liability company organized under the laws of California by Bridgepoint in December 2004 that primarily offers online degree programs. Ashford also operates the Clinton, Iowa-based college formerly known as The Franciscan University of the Prairies. Ashford is accredited by the Western Association of Schools and Colleges.

### **THE ATTORNEY GENERAL'S ALLEGATIONS**

4. The Attorney General alleges that in the course of offering for sale and selling online education degree programs, Ashford used unconscionable sales practices through which Ashford telemarketers, under significant pressure to enroll students, engaged in violations of the Consumer Fraud Act by:

- a) making false or misleading statements to prospective students in order to convince them to enroll;
- b) utilizing unfair and high pressure sales tactics, including but not limited to emotionally-charged appeals to persuade prospective students to make an uninformed decision to enroll;
- c) failing to disclose material facts to prospective students;
- d) misrepresenting to prospective students who wished to become teachers that an Ashford Education Degree would allow students to become classroom teachers when, in fact, many Ashford graduates are subject to additional requirements on a state-by-state basis that may include student teaching or practicum experience, additional coursework, additional testing, or earning an additional degree, all requiring substantial additional expenditures by students;



e) unfairly imposing a “Technology Services Fee” on all students after six weeks of enrollment, and then retaining the fee regardless of how long the student remained enrolled at Ashford.

5. The Attorney General alleges that as a result of this conduct, many students did not complete a course of study, could not obtain professional licensure, and were saddled with substantial student loan debt that they could not repay nor discharge.

6. The Attorney General believes that, in combination with changes Respondents have made over the past several years, the requirements of this AVC will provide an improved enrollment process at Ashford University that complies with the Consumer Fraud Act.

### **RESPONDENTS’ POSITION**

7. Respondents deny wrongdoing or liability of any kind, but have agreed to enter into this Assurance in order to resolve all issues raised regarding the Consumer Fraud Act during the Attorney General’s inquiry.

### **DEFINITIONS**

Whenever the terms listed below are used in this AVC, the following definitions shall apply:

8. “Academic Advisor” means any natural person employed by Respondents whose primary job responsibility is to provide current Ashford students with guidance on Ashford policies, program offerings, degree options, and information about alternatives, limitations and potential consequences of academic decisions in order to assist students in achieving their educational and career goals.

9. “Admissions Counselor” means any natural person employed by Respondents whose primary job responsibility is to recruit prospective students, including, but not limited to,

Carlos Muniz  
9/25/2013 8:37:39 AM

To: "Tampio, Christopher" <TampioC@dicksteinshapiro.com>  
cc:

Subject: Re: Meeting in November?

Sure. Let me see which of those dates are best and get back to you.

Hope all's well.

From: "Tampio, Christopher" <TampioC@dicksteinshapiro.com>  
To: "Carlos Muniz (Carlos.muniz@myfloridalegal.com)"  
<Carlos.muniz@myfloridalegal.com>  
Date: 09/24/2013 04:22 PM  
Subject: Meeting in November?

Good afternoon Carlos,  
Are you available to meet in your office with my client Bridgepoint Education  
in November. How about November 14th or 15th or the 20th-22nd?

We would like you to attend with the appropriate education and consumer affairs  
staff members. We can have AG Bondi stop by as well if her schedule permits.

Looking forward to visiting warm Florida in November.

All the best.

Chris

Chris Tampio  
Senior Advisor  
Dickstein Shapiro LLP  
1825 Eye Street NW | Washington, DC 20006

Carlos Muniz

10/1/2013 1:41:45 PM

To: "Tampio, Christopher" <TampioC@dicksteinshapiro.com>

cc:

Subject: RE: Meeting in November?

Thanks. 13th should be fine, too. My assistant, Cate Crutcher, will be reaching out to you. Hope all's well.

From: "Tampio, Christopher" <TampioC@dicksteinshapiro.com>

To: 'Carlos Muniz' <Carlos.Muniz@myfloridalegal.com>

Date: 09/30/2013 04:56 PM

Subject: RE: Meeting in November?

Having twin boys has taught me plenty of patience. Working with nice people like you makes it easier!

Having said that -- the client now has a conflict November 14th. Can we do the meeting November 13th right after the AG meeting in South Carolina? It will also save them from flying back to Cali for a meeting on the 15th.

The main objective for the meeting would be for Bridgepoint to talk to you and other appropriate staff, about their educational programs and their policies and procedures as it relates to students, marketing and compliance. Maybe you have the head of Consumer Protection and an education policy person join the meeting? And maybe have AG Bondi "stop by."

For the meeting we plan to have 3 or 4 of the following Bridgepoint team members depending on their availability.

Elyce Morris- AVP, External Relations & Special Legal Counsel (Bridgepoint)

Dr. Gregory Geoffroy – Chair, Board of Trustees, Ashford University

Melissa Garrett – AVP, Government Affairs (Bridgepoint)

Dr. Richard Pattenaude - President of Ashford University

Sheri Jones- Sr. Vice President, Administrative Services (Ashford)

Chris Tampio

Senior Advisor

Dickstein Shapiro LLP

Tel (202) 420-2708

tampioc@dicksteinshapiro.com

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<http://www.stateagmonitor.com/>

## Lipton, Eric

---

**From:** Turner, Kevin <KTurner@ago.state.al.us>  
**Sent:** Monday, February 10, 2014 9:55 AM  
**Subject:** RE: Meeting Attendees

Luther, me and Noel Barnes, Consumer Protection Section Chief.

Kevin L. Turner  
Chief Deputy Attorney General  
Office of the Alabama Attorney General  
334.353.2196 (direct)  
334.324.9584 (cell)  
[kturner@ago.state.al.us](mailto:kturner@ago.state.al.us)

-----Original Message-----

From: Tampio, Christopher [<mailto:TampioC@dicksteinshapiro.com>]  
Sent: Monday, February 10, 2014 7:46 AM  
To: Turner, Kevin  
Subject: Meeting Attendees

Kevin,  
Do you have a list of who from your office will be in the meeting with Bridgepoint tomorrow?

Thanks.

Our attendees will be:

Chris Tampio, Dickstein Shapiro  
Elyce Morris, Associate Vice President, External Relations and Special Legal Counsel  
Sheri Jones, Senior Vice President, Administrative Services  
Gregory Geoffroy, Chairman of the Board of Trustees

Sent from my iPad

Visit our State AG Monitor blog  
[www.stateagmonitor.com](http://www.stateagmonitor.com)

### Confidentiality Statement

This email message, including any attachments, is intended solely for the use of the addressee(s) named above. This communication may contain privileged and/or confidential material. If you are not the intended recipient, you have received this communication in error, and any review, use, printing, copying, or other dissemination of this email message is strictly prohibited. If you are not the intended recipient, please notify the sender immediately by reply email message or notify our email administrator at [postmaster@dicksteinshapiro.com](mailto:postmaster@dicksteinshapiro.com) and permanently delete and destroy the original message and any and all copies, including printouts and electronic copies on any computer system.

Dickstein Shapiro LLP  
[www.DicksteinShapiro.com](http://www.DicksteinShapiro.com)

## Lipton, Eric

---

**From:** Turner, Kevin <KTurner@ago.state.al.us>  
**Sent:** Monday, February 10, 2014 5:43 PM  
**Subject:** RE: Meeting Attendees

Ok. Let's plan on Jalapenos at 6:45. I can meet you at the hotel and we can walk over or meet you there. It's across the street from your hotel in "The Alley"

Kevin L. Turner  
Chief Deputy Attorney General  
Office of the Alabama Attorney General  
334.353.2196 (direct)  
334.324.9584 (cell)  
kturner@ago.state.al.us

-----Original Message-----

From: Tampio, Christopher [mailto:TampioC@dicksteinshapiro.com]  
Sent: Monday, February 10, 2014 4:31 PM  
To: Turner, Kevin  
Subject: Re: Meeting Attendees

Can you bring a phone charger for me to borrow for the eve?

It's the universal skinny input.

Blackberry.

Sent from my iPad

> On Feb 10, 2014, at 3:51 PM, "Turner, Kevin" <KTurner@ago.state.al.us>  
> wrote:

>

> What you in the mood for re dinner? There's Italian, BBQ and Mexican

> all

> across from your hotel.

>

>

> Kevin L. Turner

> Chief Deputy Attorney General

> Office of the Alabama Attorney General

> 334.353.2196 (direct)

> 334.324.9584 (cell)

> kturner@ago.state.al.us

>

>

>

> Visit our State AG Monitor blog



**Dickstein Shapiro's 2014 State AG Executive Briefing**

**Lundahl, Emily** to: Catherine Crutcher  
(cate.crutcher@myfloridalegal.com)

02/18/2014 11:24 AM

---

History: This message has been forwarded.

---

Hi Cate,

Attached is the invitation for our Executive Briefing that has room information, etc. If you click on the "For more information" section, you should see who the other panelists are. We are currently working on the topics and questions. I should be able to get you something later today.

Emily

**Emily J. K. Lundahl**

*State AG Policy Coordinator*

(202) 420-3304


lundahle@dicksteinshapiro.com

Please join us for Dickstein Shapiro's third annual State AG Executive Briefing in Washington, DC. This briefing will feature two panels: (1) State Attorneys General (AGs); and (2) Chief Deputies. The discussion will be followed by a networking reception. This event is a unique opportunity for business and legal leaders to better understand the special role that AGs have in our legal and political system, how their offices work collaboratively with each other, and to discuss current and emerging issues for AGs. Attendees are encouraged to bring their questions to these interactive sessions.

**When**

Monday, February 24, 2014



**Re: Fw: Dickstein Shapiro's 2014 State AG Executive Briefing** 

**Trish Conners** to: Catherine Crutcher  
Cc: Jennifer Meale, Tyler Cathey

02/18/2014 11:37 AM

This is the one where I turned down the Deputy panel invitation to me due to a conflict, fyi.

Catherine Crutcher Hi Cate,

02/18/2014 11:28:01 AM

From: Catherine Crutcher/OAG  
To: Jennifer Meale/OAG@oag, Tyler Cathey/OAG@oag, Trish Conners/OAG@oag  
Date: 02/18/2014 11:28 AM  
Subject: Fw: Dickstein Shapiro's 2014 State AG Executive Briefing

AG agreed to do this...

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

**From:** Lundahl, Emily <LundahlE@dicksteinshapiro.com>  
**Sent:** Tuesday, February 18, 2014 11:24 AM  
**To:** Catherine Crutcher (cate.crutcher@myfloridalegal.com)  
**Subject:** Dickstein Shapiro's 2014 State AG Executive Briefing

Hi Cate,

Attached is the invitation for our Executive Briefing that has room information, etc. If you click on the "For more information" section, you should see who the other panelists are. We are currently working on the topics and questions. I should be able to get you something later today.

Emily

**Emily J. K. Lundahl**  
*State AG Policy Coordinator*  
(202) 420-3304  
lundahle@dicksteinshapiro.com

Please join us for Dickstein Shapiro's third annual State AG Executive Briefing in Washington, DC. This briefing will feature two panels: (1) State Attorneys General (AGs); and (2) Chief Deputies. The discussions will be followed by a networking reception. This event is a unique opportunity for business and legal leaders to be



3:30 PM - 6:00 PM EST

**Where**

The Ritz-Carlton, Salon 3B  
1150 22nd Street, NW  
Washington, DC

**Agenda**

**3:30 - 3:45 PM Welcome and Introduction**

Bernard Nash, State AG Practice Leader

**3:45 - 4:30 PM Chief Deputy Perspective: Collaboration Among State AGs**

**Moderator:** JB Kelly, Partner, State AG Practice

**Speakers:**

- Joe Dandurand, Missouri Deputy Attorney General
- Carol Isaacs, Michigan Chief Deputy Attorney General (*new speaker*)
- Brad Phelps, Arkansas Chief Deputy Attorney General (*new speaker*)

**4:30 - 5:15 PM Emerging State AG Issues: 2014 and Beyond**

**Moderator:** Lori Kalani, Partner, State AG Practice

**Speakers:**

- Pam Bondi, Florida Attorney General
- Jon Bruning, Nebraska Attorney General
- George Jepsen, Connecticut Attorney General

**5:15 - 6:00 PM Networking Reception**

**For more information, please click [here](#).**

Please respond by clicking either [Yes](#) or [No](#). We look forward to your response.

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Dickstein Exec Briefing Mon , Feb 24 -- Emerging AG Issues

Kalani, Lori to: Catherine Crutcher

Cc: "Lundahl, Emily"

02/20/2014 10:11 AM

---

History: This message has been forwarded.

---

Cate:

Please pass the note below on to the AG.

General Bondi:

I appreciate your willingness to participate in our AG Executive Briefing next Monday, February 24. As a reminder, you will be joining AGs George Jepsen and Jon Bruning on a 45-minute panel beginning at 4:30PM on "Emerging State AG Issues." More than 40 attendees have RSVP'd, including in-house counsel, government affairs, and strategy experts in Fortune 500 companies, industry groups, academia, and other institutions (I have attached the invitation and agenda).

Because you have taken an innovative and leading role on prescription drugs, my intent is to direct specifically to you, a few questions regarding this subject, such as:

- 1. Why you and other AGs have focused on prescription drug abuse and the steps you have taken to combat their abuse.**
- 2. What role AGs can play in promoting technologies and methods to make prescription drugs less likely to be abused, such as tamper-resistant technologies and pill tracking programs**
- 3. What is next for AGs on this topic.**

I will be asking similarly specific questions of General Jepsen on financial fraud issues, and of General Bruning on patent trolls. I also will be directing some questions to all three of you for your thoughts on some other emerging issues, such as data privacy and breaches; False Claims Act cases; online advertising and marketing; and AGs' use of new technology to communicate with consumers and identify issues.

Let me know if you have any questions or thoughts on the above. Once again, thank you very much for participating in what should be a fascinating discussion.

Best,

Lori

**Lori E. Kalani**

Partner

Dickstein Shapiro LLP

(202) 420-3139

KalaniL@dicksteinshapiro.com

**Visit our State AG Monitor blog**

<http://www.stateagmonitor.com/>

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..2014. Dickstein Shapiro AG Executive Briefing Invite.pdf.

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## Information

## Summary

## Meet the AGs

## Meet the Chief Deputies

## Meet the Moderators

## Contact Us

Information Summary

## Summary

Please join us for Dickstein Shapiro's third annual State AG Executive Briefing in Washington, DC. This briefing will feature two panels: (1) State Attorneys General (AGs); and (2) Chief Deputies. The discussions will be followed by a networking reception. This event is a unique opportunity for business and legal leaders to better understand the special role that AGs have in our legal and political system, how their offices work collaboratively with each other, and to discuss current and emerging issues for AGs. Attendees are encouraged to bring their questions to these interactive sessions.

**When**

Monday, February 24, 2014  
3:30 PM - 6:00 PM EST

**Where**

The Ritz-Carlton, Salon 3B  
1150 22nd Street, NW  
Washington, DC

**Agenda****3:30 - 3:45 PM Welcome and Introduction**

Bernard Nash, State AG Practice Leader

**3:45 - 4:30 PM Chief Deputy Perspective: Collaboration Among State AGs**

AG offices expand their reach and pool resources by collaborating on investigations and enforcement actions. They also expand their impact through jointly filed *amici* briefs and letters to Congress and federal regulators. This panel of chief deputies will provide insight into how AGs work together and coordinate their actions:

- Multi-State Investigation and Litigation
- State False Claims Act Interventions and Filings
- CAFA Decisions
- *Amici* Briefs
- Sign-on Letters

**Moderator:** JB Kelly, Partner, State AG Practice

**Speakers:** Joe Dandurand, Missouri Deputy Attorney General

Carol Isaacs, Michigan Chief Deputy Attorney General

Brad Phelps, Arkansas Chief Deputy Attorney General

**4:30 - 5:15 PM Emerging State AG Issues: 2014 and Beyond**

AGs often are out front on complex legal issues. AG investigations, enforcement actions, settlements, and policymaking have reshaped entire sectors of the economy. Hear AGs discuss:

- Patent Trolls
- State False Claims Acts
- Financial Fraud

**Moderator:** Lori Kalani, Partner, State AG Practice

**Speakers:** Pam Bondi, Florida Attorney General

Jon Bruning, Nebraska Attorney General

George Jepsen, Connecticut Attorney General

**5:15 - 6:00 PM Networking Reception**

To keep current on AG issues, please visit our blog or follow us on Twitter:



**Bernie Nash Lori Kalani Milton Marquis JB Kelly  
Divonne Smoyer Maria Heard Chris Tampio**

*cordially invite you to attend*

**Dickstein Shapiro's 30th  
NAAG Winter Meeting Dinner**

**Tuesday, February 25, 2014**

(following the NAAG Supreme Court Reception)

**7:00 PM Cocktails**

**8:00 PM Dinner**

**Tosca**

**1112 F Street, NW, Washington, DC**

Kindly RSVP to: Emily Lundahl at (202) 420-3304 or [lundahle@dicksteinshapiro.com](mailto:lundahle@dicksteinshapiro.com)



**Dickstein dinner - February 25**

**Lundahl, Emily** to: Catherine Crutcher  
(cate.crutcher@myfloridalegal.com)

02/10/2014 04:11 PM

---

Hi Cate,

General Bondi and Lori Kalani spoke on the phone earlier today. General Bondi mentioned to Lori that she will attend our dinner on February 25th, so please pencil it on her calendar. Our dinner is Tuesday, Feb. 25, immediately after NAAG's Supreme Court reception. The dinner will be held at Tosca, 1112 F St., NW.

Thank you,

Emily

**Emily J. K. Lundahl**

*State AG Policy Coordinator*

Dickstein Shapiro LLP

1825 Eye Street NW | Washington, DC 20006

Tel (202) 420-3304 | Fax (202) 420-2201

lundahle@dicksteinshapiro.com

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---



**Dickstein dinner**

**Lundahl, Emily** to: Catherine Crutcher  
(cate.crutcher@myfloridalegal.com)

02/20/2014 10:58 AM

---

History: This message has been replied to.

---

Hi Cate,

I'm just checking in about General Bondi attending our dinner next Tuesday. I think the General and Lori spoke, and Lori was under the impression that she is attending. Can you please confirm?

Thanks,

Emily

**Emily J. K. Lundahl**  
*State AG Policy Coordinator*  
Dickstein Shapiro LLP  
1825 Eye Street NW | Washington, DC 20006  
Tel (202) 420-3304 | Fax (202) 420-2201  
lundahle@dicksteinshapiro.com

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---



RE: Dickstein dinner  
Lundahl, Emily to: 'Catherine Crutcher'

02/20/2014 11:03 AM

---

OK. Thanks.

**Emily J. K. Lundahl**  
State AG Policy Coordinator  
(202) 420-3304  
lundahle@dicksteinshapiro.com

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**From:** Catherine Crutcher [mailto:cate.crutcher@myfloridalegal.com]  
**Sent:** Thursday, February 20, 2014 11:03 AM  
**To:** Lundahl, Emily  
**Subject:** Re: Dickstein dinner

Good morning,

I was not engaged in this conversation. If Lori extended a personal invitation through a conversation with the AG, then perhaps Lori knows?

Sincerely,

Catherine Anne Crutcher  
Senior Executive Assistant to Attorney General Pam Bondi  
PL-01 The Capitol  
Tallahassee, FL 32399  
(850)245-0140

▼ "Lundahl, Emily" ---02/20/2014 10:58:16 AM---Hi Cate, I'm just checking in about General Bondi attending our dinner next Tuesday. I think the Ge



**Pam Bondi**  
Attorney General

*You're Invited*

*To a Reception In Support Of*

***Florida Attorney General  
Pam Bondi***

*Monday, February 24, 2014*

*6:00-7:00pm*

*At*

*Office of Home Depot*

*1155 F Street NW, Ste. 400*

*Washington, DC 20004*

Minimum Suggested Contribution: \$3,000.

Please make checks payable to: Pam Bondi for Attorney General.

For Additional Information and to RSVP, please contact  
Debbie Aleksander at [Debbie@pambondi.com](mailto:Debbie@pambondi.com) or 850.339.8116

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Also includes donations from various other groups that lobby attorneys general, from the Beer Wholesalers to soft drink industry.

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| Bondi, Pam (REP)(ATG)        | 2/24/2014        | \$        | 1,000      | MOCEK GREGORY                          | WASHINGTON, DC 20007        | ATTORNEY               |
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| <b>Bondi, Pam (REP)(ATG)</b> | <b>2/24/2014</b> | <b>\$</b> | <b>500</b> | <b>PATRICK LYNCH GROUP, LLC</b>        | <b>PROVIDENCE, RI 02903</b> | <b>GOVT. RELATIONS</b> |
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| Bondi, Pam (REP)(ATG)        | 2/24/2014        | \$        | 500        | WHEELER THOMAS B.                      | NAPLES, FL 34102            | RETIRED                |

Source: Florida state records

## *The Following Host Committee*

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*Invite you to a Reception in Support of*

*Attorney General Pam Bondi*

*With Special Guests*

*Donald Trump and Mayor Rudy Giuliani*

*Friday, March 14, 2014*

*6:30-8:00pm*

*The Mar-a-Lago Club*

*1100 South Ocean Blvd*

*Palm Beach, FL 33480*

*Suggested Minimum Contribution: \$3,000*

*RSVP to Debbie Aleksander at [Debbie@pambondi.com](mailto:Debbie@pambondi.com) or 850-339-8116*

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**State Attorneys General**

**A Communication from the Chief Legal Officers  
of the Following States and Territories:**

**Arizona \* Florida \* Guam \* Hawaii \* Kansas  
Michigan \* Missouri \* Montana \* Nebraska \* North Dakota  
South Carolina \* South Dakota \* Texas \* Utah  
Vermont \* Wyoming**

February 4, 2014

The Honorable Bob Goodlatte  
Chairman, Committee on the Judiciary  
United States House of Representatives  
2138 Rayburn House Office Building  
Washington, D.C. 20515

The Honorable Patrick Leahy  
Chairman, Committee on the Judiciary  
United States Senate  
224 Dirksen Senate Office Building  
Washington, D.C. 20510

The Honorable John Conyers, Jr.  
Ranking Member, Committee on the Judiciary  
United States House of Representatives  
B-351 Rayburn House Office Building  
Washington, D.C. 20515

The Honorable Chuck Grassley  
Ranking Member, Committee on the Judiciary  
United States Senate  
224 Dirksen Senate Office Building  
Washington, D.C. 20510

Dear Chairman Goodlatte, Chairman Leahy, Ranking Member Conyers, and Ranking Member Grassley:

We write to request that Congress carefully consider the policy implications of a recent reversal of the U.S. Department of Justice's (DOJ) interpretation of the Wire Act, 19 U.S.C. Section 1084, as it applies to Internet gambling.

For years, the federal government had consistently deemed the Wire Act to prohibit all forms of gambling involving interstate wire transmissions – including transmissions over the Internet. In late 2011, reversing its own longstanding interpretations, the DOJ's Office of Legal Council issued a legal opinion stating that the Wire Act only bans sports betting, and that it does not apply to online lottery sales.

The impact of this opinion – which in effect opens the door to the spread of Internet gambling – will have a potentially significant impact on state and local law enforcement. As such, we urge Congress to fully review, assess, understand and debate the significant policy implications entailed in the spread of Internet gambling, including concerns related to money laundering; access by minors; fraud; exploitation of individuals with a gambling addiction; and terrorist financing.

Since the 2011 opinion, Nevada, New Jersey and Delaware have already passed legislation legalizing various forms of internet gambling. The rules now vary in each of these jurisdictions, and given the inherently *interstate* nature of internet gambling transactions, we anticipate that it will become increasingly difficult to effectively regulate such conduct as additional jurisdictions consider legalizing internet gambling.

Given the expected enforcement challenges to various state laws, we ask that Congress restore the decades-long interpretation of the Wire Act to allow Congress and the states to more fully consider the public policy ramifications of the DOJ's reinterpretation of the Wire Act and to give federal and state law enforcement agencies time to fully assess and report on the implications Internet gambling has on our respective charges to protect the citizens of our states.

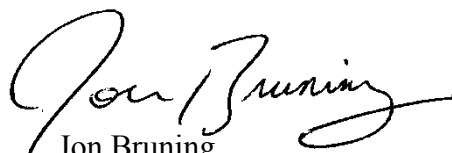
To be sure, we believe Congress may only regulate transactions which are interstate in nature, consistent with fundamental constitutional principles. Our system of government commands that other matters be left to the state authorities. To the extent Internet gambling is interstate in nature, federal oversight, in addition to state regulation, is appropriate.

We appreciate your consideration of this request, and stand ready to assist as you more fully consider the public policy implications raised by this recent decision.

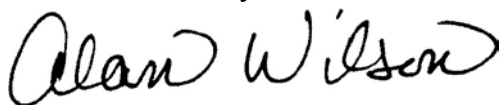
Sincerely,



Chris Koster  
Missouri Attorney General



Jon Bruning  
Nebraska Attorney General



Alan Wilson  
South Carolina Attorney General



Tom Horne  
Arizona Attorney General



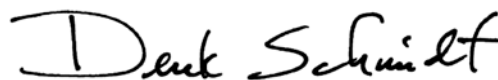
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Peter K. Michael  
Wyoming Attorney General

Copy: The Honorable John Boehner, Speaker, United States House of Representatives  
The Honorable Nancy Pelosi, Minority Leader, United States House of Representatives  
The Honorable Harry Reid, Majority Leader, United States Senate  
The Honorable Mitch McConnell, Minority Leader, United States Senate

## Attorney General Pam Bondi News Release

January 9, 2014

Media Contact: Jenn Meale

Phone: [\(850\) 245-0150](tel:8502450150)

[en Español](#)

 [Print Version](#)

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### **Attorney General Pam Bondi Announces Selection of Tyler Cathey as Chief Deputy Attorney General**

TALLAHASSEE, Fla.—Attorney General Pam Bondi today announced her selection of Tyler Cathey to serve as the Chief Deputy Attorney General. Cathey is currently an attorney with the Tampa office of Englander Fischer LLP. He previously worked in private practice with the Tampa office of the law firm of Holland & Knight, and he served as Special Counsel to the Attorney General's 2010 statewide campaign during the general election.

"Tyler is an excellent attorney, and we are excited to add his legal expertise, strong work ethic and leadership skills to the outstanding team in the Attorney General's Office. I am so proud of the team we have built across our state and the work that is being done every day to help advance the important priorities of our office, such as ending human trafficking, stopping prescription drug abuse, and combating Medicaid fraud," stated Attorney General Pam Bondi.

Cathey is a graduate of Muhlenberg College and the University of Florida, Levin College of Law. He was a Gubernatorial Fellow in Governor Jeb Bush's Office of General Counsel. Cathey served on the Federal Judicial Nominating Commission of Florida—Middle District, and he was the Captain of the 2010 USA Rugby Men's National Championship team. Cathey and his wife, Callie, have four children.

Cathey replaces Carlos Muniz, who served as Chief of Staff and Deputy Attorney General since Attorney General Bondi took office.





**RE: So sorry - entire mtg canceled**

**Matthew Durkin** to: Karen White, Lauren Niehaus

03/25/2014 06:25 PM

"Kalanil@dicksteinshapiro.com", "Patrick Lynch",  
Cc: "FN@interactivglobalsolutions.com" , John Suthers,  
"Catherine Cortez Masto (catherine@ag.nv.gov)", "Heather D.

---

Thanks.

Is anyone up for another tourist adventure?

**From:** Karen White [mailto:karen.white@cwagweb.org]

**Sent:** Tuesday, March 25, 2014 4:24 PM

**To:** Lauren Niehaus

**Cc:** Kalanil@dicksteinshapiro.com; Patrick Lynch; FN@interactivglobalsolutions.com; John Suthers; Matthew Durkin; Catherine Cortez Masto (catherine@ag.nv.gov); Heather D. Procter; Nilda Pedrosa (Nilda.Pedrosa@myfloridalegal.com); tyler.cathey@myfloridalegal.com; Jeff Tsai (jeffrey.Tsai@doj.ca.gov); Brian Nelson (Brian.nelson@doj.ca.gov); Mateo Munoz (Mateo.Munoz@doj.ca.gov); David.beltran@doj.ca.gov; Drew Spence (Drew.Spence@doj.ca.gov); Susan Lustig; Juan Rodriguez (Juan.Rodriguez@doj.ca.gov)

**Subject:** So sorry - entire mtg canceled

The combination of time change weather logistics is not going to work. Please gather in lobby at 6:45 for 5 min walk (or 2 min ride) to dinner.

Karen White  
Executive Director  
CWAG

[Karen.White@cwagweb.org](mailto:Karen.White@cwagweb.org)

(916) 833-2603

Pardon Any Mistypes/Fragments

Sent from my iPhone

On Mar 25, 2014, at 3:34 PM, "Lauren Niehaus" <[lniehaus@cwagweb.org](mailto:lniehaus@cwagweb.org)> wrote:

Secretary of Economy Guajardo Is running late coming from a meeting at the President's office.

We will now leave the hotel at 4:50, meet with Sec. Guajardo from 5:30-6:15pm, then be done with the evening.

Please confirm receipt!

Thanks,

Lauren Niehaus  
Director of Program Coordination  
CWAG Alliance Partnership  
303.827.9039 – Cell



**So sorry - entire mtg canceled**

**Karen White** to: Lauren Niehaus

"Kalanil@dicksteinshapiro.com", "Patrick Lynch",

Cc: "FN@interactivglobalsolutions.com"

"John.Suthers@state.co.us", Matthew Durkin, "Catherine

03/25/2014 06:24 PM

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Executive Director  
CWAG

[Karen.White@cwagweb.org](mailto:Karen.White@cwagweb.org)

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Lauren Niehaus  
Director of Program Coordination  
CWAG Alliance Partnership  
303.827.9039 – Cell  
[LNiehaus@cwagweb.org](mailto:LNiehaus@cwagweb.org)

1300 I Street  
Sacramento, CA 95814  
[www.cwagweb.org/AP](http://www.cwagweb.org/AP)



**Article - In week, Mexico finds 370 abandoned child migrants**

Matthew Durkin, Jeff Tsai

**Lauren Niehaus** to: (jeffrey.Tsai@doj.ca.gov), Brian Nelson  
(Brian.nelson@doj.ca.gov),

03/30/2014 10:33 PM

Cc: "Nilda Pedrosa (Nilda.Pedrosa@myfloridalegal.com)"  
"tyler.cathey@myfloridalegal.com", Karen White

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Colleagues – below please find a link to an article General Bondi passed along to share with all of you in our Mexico Delegation – please share with your AGs, thanks!

**In week, Mexico finds 370 abandoned child migrants**

[http://ipad.aol.com/article/2014/03/29/in-week-mexico-finds-370-abandoned-child-migrants/20859440/?picid=maing-grid7%7cmain5%7cd117%7csec1\\_Ink2%2526pLid%253D459028%3fncid=txtlnkusaolp0000058&](http://ipad.aol.com/article/2014/03/29/in-week-mexico-finds-370-abandoned-child-migrants/20859440/?picid=maing-grid7%7cmain5%7cd117%7csec1_Ink2%2526pLid%253D459028%3fncid=txtlnkusaolp0000058&)

Lauren Niehaus  
Director of Program Coordination  
CWAG Alliance Partnership  
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[LNiehaus@cwagweb.org](mailto:LNiehaus@cwagweb.org)

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Sacramento, CA 95814  
[www.cwagweb.org/AP](http://www.cwagweb.org/AP)

HAND DELIVERED

FLORIDA COMMISSION ON ETHICS

1830

Form 9

QUARTERLY GIFT DISCLOSURE (GIFTS OVER \$100)

SEP 29 2014

RECEIVED

|  |               |                 |   |  |
|--|---------------|-----------------|---|--|
| LAST NAME -- FIRST NAME -- MIDDLE NAME:<br>Bondi Pamela Jo |               |                 | NAME OF AGENCY:<br>Office of the Attorney General-DIA   |  |
| MAILING ADDRESS:<br>PL-01 The Capitol                      |               |                 | OFFICE OR POSITION HELD:<br>Attorney General  |  |
| CITY:<br>Tallahassee                                       | ZIP:<br>32399 | COUNTY:<br>Leon | FOR QUARTER ENDING (CHECK ONE):<br><input type="checkbox"/> MARCH <input checked="" type="checkbox"/> JUNE <input type="checkbox"/> SEPTEMBER <input type="checkbox"/> DECEMBER |  |
|  |               |                 | YEAR<br>2014  |  |

PROCESSED CONFIDENTIAL  
PART A — STATEMENT OF GIFTS

Please list below each gift, the value of which you believe to exceed \$100, accepted by you during the calendar quarter for which this statement is being filed. You are required to describe the gift and state the monetary value of the gift, the name and address of the person making the gift, and the date(s) the gift was received. If any of these facts, other than the gift description, are unknown or not applicable, you should so state on the form. As explained more fully in the instructions on the reverse side of the form, you are not required to disclose gifts from relatives or certain other gifts. You are not required to file this statement for any calendar quarter during which you did not receive a reportable gift.

| DATE RECEIVED | DESCRIPTION OF GIFT                               | MONETARY VALUE | NAME OF PERSON MAKING THE GIFT           | ADDRESS OF PERSON MAKING THE GIFT                            |
|---------------|---|----------------|--|--|
| 6/19-6/23     | Flight, hotel, food & beverage b ground transport | 6,796.85       | Republican Attorneys General Association | 1747 Pennsylvania Ave, N.W. Suite 800 Washington, D.C. 20006 |
|               |   |                |  |  |
|               |   |                |  |  |
|               |   |                |  |  |

CHECK HERE IF CONTINUED ON SEPARATE SHEET

PART B — RECEIPT PROVIDED BY PERSON MAKING THE GIFT

If any receipt for a gift listed above was provided to you by the person making the gift, you are required to attach a copy of that receipt to this form. You may attach an explanation of any differences between the information disclosed on this form and the information on the receipt.

CHECK HERE IF A RECEIPT IS ATTACHED TO THIS FORM

PART C — OATH

|  |   |
|--|---|
| I, the person whose name appears at the beginning of this form, do<br>depose on oath or affirmation and say that the information disclosed<br>herein and on any attachments made by me constitutes a true accurate,<br>and total listing of all gifts required to be reported by Section 112.3148,<br>Florida Statutes.<br><br><u>Pam Bondi</u><br>SIGNATURE OF REPORTING OFFICIAL | STATE OF FLORIDA<br>COUNTY OF <u>Leon</u><br>Sworn to (or affirmed) and subscribed before me this<br><u>26</u> day of <u>September</u> , 20 <u>14</u><br>by <u>Pamela Jo Bondi</u><br><u>Leslie H. Jacobs</u><br>(Signature of Notary Public-State of Florida)<br><u>Leslie H. Jacobs</u><br>(Print, Type, or Stamp Commissioned Name of Notary Public)<br>Personally Known <input checked="" type="checkbox"/> OR Produced Identification<br>Type of Identification Produced |
|--|---|

PART D — FILING INSTRUCTIONS



This form, when duly signed and notarized, must be filed with the Commission on Ethics, P.O. Drawer 15709, Tallahassee, Florida 32317-5709; physical address: 325 John Knox Road, Building E, Suite 200, Tallahassee, Florida 32303. The form must be filed no later than the last day of the calendar quarter that follows the calendar quarter for which this form is filed (For example, if a gift is received in March, it should be disclosed by June 30.)

Edmund Randolph Club Event & RAGA Summer Meeting, 6/19-23/2014

Attorney General Pam Bondi

Flight- \$721.58

Hotel- \$4,246.00

Food & Beverage- \$1,457.27

Ground transportation- \$372.00

## **STATEMENTS FROM ATTORNEY GENERAL PAM BONDI OR HER OFFICE**

"My office aggressively protects Floridians from unfair and deceptive business practices, and absolutely no access to me or my staff is going to have any bearing on my efforts to protect Floridians."

### **FOLLOW UP STATEMENTS**

QUESTION: On Aug 16, 2012, Jen, you were quoted in a business news publication saying: Florida AG Pam Bondi is "actively reviewing the Libor matter" and has issued subpoenas, spokeswoman Jenn Meale said. Can you tell me this review is still underway, or if the matter has been closed, or if you have file any specific public matters related to this. My research shows me that you have not taken any action publicly on this topic so far.

**Answer: We have progressed from reviewing the Libor matter to actively investigating Libor, and we have issued 20 civil investigative demands to date.**

QUESTION: Similarly, with Herbalife. I know you met with representatives from Herbalife. Some other states have announced investigations of the company. You have not initiated one, I have been told. Fact checking. Can you confirm that there is no active investigation of the company.

**Answer: Over the past two years, we have received three complaints regarding Herbalife, and there is no formal investigation at this time.**

QUESTION: Bridgepoint Education. Again, I know your office has met with representatives from the company. I know that Bridgepoint has issued statements anytime it has been subject to a subpoena or enforcement action, in states including Mass, . There is no public record of any action by Florida related to Bridgepoint. I wanted to ask if you are investigating the company or do not have an active investigation.

**Answer: Our office met with Bridgepoint on November 13, 2013 in Tallahassee, and we had received only a handful of complaints about Ashford University or Bridgepoint--all prior to the meeting. In our meeting, Bridgepoint laid out all of the substantial changes they had undertaken at their schools to address the issues that had been prevalent in the other for-profit matters we had investigated and settled. They also explained the circumstances surrounding the investigation Iowa, which showed that either the concerns there were limited to the schools with a physical presence in Iowa or had been addressed subsequently by the significant changes Bridgepoint had made. We have received no complaints about Ashford University or Bridgepoint since that meeting.**

QUESTION: I have read that the Attorney General was reluctant to move ahead with this case (37 2009 CA 004303 - DEPT OF LEGAL AFFAIRS OFFICE OF THE ATTORNEY GENER vs EXPEDIA INC) because she felt that the state law was too ambiguous and urged the legislature to clarify it. I see below, from the docket, this case was dismissed, which I read that the Attorney General's office voluntarily moved to dismiss the case. Please confirm that everything in this paragraph is accurate.

**Answer: The Attorney General's Office dismissed the case after a ruling by the First District Court of Appeal in Tallahassee on February 28, 2013 that the transactions were not taxable, and that is where the case stands. The Florida Department of Revenue, which would be the agency responsible for collecting the tax, has taken the position that the law is ambiguous and any statement by our office to that effect was based upon that agency's view, as well as judicial rulings during the course of our litigation. The ruling, which was a 2-1 decision, reflects the ambiguity in state law. See the attached opinion.**

Q: When I asked about why the AG dropped this case, you cited an appeals court decision that went in the favor of the online travel companies. But I was noticing that the Florida Supreme Court has still not

decided on the matter. So why would the AG dismiss a case when the very same question is pending before the state Supreme Court?

**ANSWER:** Our case was still in the early procedural stages when the First DCA ruled on the case now before the Supreme Court. When the First DCA ruled that the transactions were not taxable, our case had no chance of successfully advancing on the merits, whether we took a voluntary dismissal or waited for the trial court to dismiss based upon the binding First DCA decision and then appealed that dismissal to the First DCA. Because the First DCA had already ruled on the issue, any appeal from a trial court dismissal would also have had no chance of success. If the Supreme Court ultimately reverses the First DCA and rules in the local governments' favor, we will be in a position to take advantage of that ruling and refile the case as warranted. We are in the same position regardless.

5) The Accretive issue relates to contact with your office in April 2012 by representatives from Dickstein. At the time, the Minnesota Attorney General was investigating the company, a case that [was settled in July 2012](#). Dickstein during this interim period contacted a number of attorneys general offices to address questions they might have about the company and its operations, with a goal of discouraging any other states from following Minnesota's lead and suing Accretive. In one April 26, 2012 email from Bernie Nash at Dickstein to Carlos Muniz from your office--there is not much to the email--just a reference to Accretive and the fact that the company operated through Sacred Heart and St. Vincent Jacksonville in Florida. Here is my direct question: did the verbal and email appeals from Dickstein play a role in any decision your office made to not initiate your own action against Accretive. Dickstein in marketing materials has said that it "convinced" other attorneys general not to follow Minnesota's lead.

**Answer) No. As with any potential enforcement matter, this office conducted its own due diligence by, among other things, contacting the Minnesota Attorney General's Office when Minnesota's allegations came to light. We subsequently determined that not only had this office not received a single related consumer complaint, but also that the unfair debt collection practices alleged in the Minnesota complaint appeared to be largely Minnesota-specific, a fact later confirmed by the Federal Trade Commission in a closing letter to Accretive Health's counsel.**