

CHAPTER II

AMERICAN INTERNATIONAL CENTER

Ben, I need to set up a web site for the American International Center, which should have all sorts of goodies to make it look real ... Can you create something?

Email from Jack Abramoff to Benjamin Mackler, Mack Design, January 19, 2002

CHAIRMAN MCCAIN: [Scanlon] approached you in some way?

MR. GROSH: A phone call.

CHAIRMAN MCCAIN: And said?

MR. GROSH: Do you want to be head of an international corporation. [Laughter] It is a hard one to turn down. [Laughter]

Committee Chairman McCain and former Rehoboth Beach lifeguard David Grosh, Committee Hearing, June 22, 2005

A. INTRODUCTION

In the course of its hearings over the last two years, the Committee preliminarily found that the American International Center (“AIC”), a supposed think tank based in Rehoboth Beach, Delaware, and headed by two of Scanlon’s beach buddies, was not what it purported to be. In actuality, AIC was one of several entities owned or controlled by Michael Scanlon or Jack Abramoff that they used as part of their “gimme five” scheme—their secret scheme to wrongfully divert millions of dollars in fees paid by their Tribal clients for purely personal use. However, from 2001 through 2003, AIC was itself Abramoff’s ninth biggest lobbying client, reportedly paying him and his employer about \$1.7 million in lobbying fees.¹ In 2002 alone, AIC reportedly paid Greenberg Traurig \$840,000, making it the Firm’s fifth largest client that year.² Until the Committee’s hearings, the nature and business of AIC remained elusive: one industry observer described it at the time as “a client with interests that are hard to decipher.”³

In court filings associated with their federal criminal pleas, Abramoff and Scanlon admitted that they used AIC (and other Scanlon-controlled entities) to receive funds for work done by another Scanlon entity, called Capitol Campaign Strategies (“CCS”).⁴ Moreover, recently appearing before the Committee, a representative of Greenberg Traurig described AIC more plainly as “a sham”

¹ Brody Mullins, *Abramoff Shops Himself on K Street*, Roll Call, March 23, 2004.

² Shawn Zeller, *Lobbying & Law—K Street Cooled Off in 2002*, National Journal, April 19, 2003.

³ *Id.*

⁴ Plea Agreement, Factual Basis for the Plea at para. 2, *U.S. v. Michael P.S. Scanlon* (Dist. D.C., November 17, 2005) (CR-05-411); Plea Agreement, Factual Basis for the Plea at para. 4, *U.S. v. Jack A. Abramoff* (Dist. D.C., January 3, 2006) (CR-06-001).

and merely “a front for Mr. Abramoff and Mr. Scanlon to collect money.”⁵ Given the information the Committee has obtained during its investigation, the Committee shares that conclusion. Below, the Committee explains why.

After providing background on how AIC was started and how it was used as a conduit to further the Tribes’ grassroots strategies, this Chapter will describe how Abramoff and Scanlon used AIC to further their “gimme five” scheme, secretly splitting fees paid by the Coushatta Tribe of Louisiana (“Louisiana Coushatta”) and, to a lesser extent, the Mississippi Band of Choctaw Indians (“Choctaw”).

B. A DAY AT THE BEACH—HOW AIC WAS STARTED

AIC was apparently started in early 2001.⁶ In an interview with Committee staff, Christopher Cathcart, who ultimately served as Scanlon’s most senior and highest-paid assistant, described AIC as “a joint project” between Scanlon and Abramoff.⁷ Otherwise, Cathcart claims, he did not know what role Abramoff had in AIC.⁸

Early in 2001, Scanlon called his long-time friend and fellow life-guard David Grosh and asked him whether he wanted to serve as a director of an “international corporation.”⁹ Grosh, who knew quite well that his background was unsuited for such a position, thought that this was a joke but finally agreed:¹⁰

CHAIRMAN MCCAIN: [Scanlon] approached you in some way?

MR. GROSH: A phone call.

CHAIRMAN MCCAIN: And said?

MR. GROSH: Do you want to be head of an international corporation. [Laughter] It is a hard one to turn down. [Laughter].¹¹

Scanlon then offered Grosh \$500 per month to serve as a director of AIC.¹² At some point, Grosh asked Scanlon why he selected him.¹³ According to Grosh, Scanlon answered, “because you are a political unknown.”¹⁴ When Grosh asked Scanlon what AIC would do, Grosh recalled, Scanlon said that it “would have research done by subcontractors in support of a particular political objective and would deliver the research to different groups and people.”¹⁵ Notably, Grosh also recalled Scanlon mentioning that he had experience “running campaigns” in countries in Asia and Central America.¹⁶

⁵ “Tribal Lobbying Matters,” *Hearings before the Committee on Indian Affairs*, 109th Cong. at 22 (November 2, 2005) (testimony of Fred Baggett, Chair, National Government Affairs Practice, Greenberg Traurig).

⁶ Interview of Christopher Cathcart, former associate, Capitol Campaign Strategies, in Washington, D.C. (May 5, 2005).

⁷ *Id.*

⁸ *Id.*

⁹ Interview of David Grosh, former director, American International Center, in Washington, D.C. (February 8, 2005).

¹⁰ *Id.*

¹¹ “Tribal Lobbying Matters,” *Hearings before the Committee on Indian Affairs*, 109th Cong. at 35 (June 22, 2005) (testimony of David Grosh, former director, American International Center).

¹² Interview of David Grosh, former director, American International Center, in Washington, D.C. (February 8, 2005).

¹³ *Id.*

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ *Id.*

Grosh served as a director of AIC from February through September 2001.¹⁷ In his interview with Committee staff, he readily conceded that his professional and educational background were completely unrelated to the purported mission of AIC of “enhancing the methods of empowerment for territories, commonwealths and sovereign nations in the possession of and within the United States.”¹⁸ He also conceded that his background did not qualify him to serve on the board of “an international think tank.”¹⁹ Throughout the time that Grosh served as a director of AIC, he thought that “this was some silly game that Scanlon was playing.”²⁰

Between February and July 2001, “AIC had no office; AIC’s business address was the beach house that [Grosh] and [yoga instructor Brian Mann] rented” in Rehoboth Beach.²¹ In response to a question posed during a Committee hearing about what AIC did, Grosh responded that during the four or five months when he was “involved” with AIC, “we only rented the first floor of a house and installed some computers.”²²

Late in 2001 or early in 2002, Scanlon started talking to Mann about possibly working for him.²³ Mann was Grosh’s house-mate at the time.²⁴ In his deposition, Mann recalls that Scanlon was looking for office space, so Mann set him up with his landlord regarding empty space below where he lived.²⁵ After Mann started working for Scanlon, he came to learn that Scanlon did public relations work for Indian casinos.²⁶ In particular, Scanlon claimed he conducted projects intended to help those Tribes with their market share.²⁷ In furtherance of these projects, Mann began to research, and distribute to other Scanlon employees, articles regarding Scanlon’s Tribal clients.²⁸ In fact, according to Mann, “researching arti-

¹⁷ Interview of David Grosh, former director, American International Center, in Washington, D.C. (February 8, 2005).

¹⁸ *Id.*; *American International Center* (no longer available) <<http://www.amercent.org/mis-sion.html>> (setting forth AIC mission statement).

¹⁹ Interview of David Grosh, former director, American International Center, in Washington, D.C. (February 8, 2005).

²⁰ *Id.*

²¹ *Id.* At least one other entity owned or controlled by Scanlon, called the Scanlon Foundation for Kids, was later run out of this office. Deposition of Brian Mann, former director, American International Center, in Washington, D.C. (March 31, 2005). According to Mann, Scanlon intended the Foundation, which had no employees or physical assets but may have received outside contributions, for only two things: (1) buy books and school supplies for unprivileged children from a particular school and (2) buy, in conjunction with the YMCA, Christmas presents for a local “economically deprived” community. *Id.*

²² “Tribal Lobbying Matters,” *Hearings before the Committee on Indian Affairs*, 109th Cong. at 35 (June 22, 2005) (testimony of David Grosh, former director, American International Center). At some point, Scanlon had a telephone installed that he instructed Grosh never to answer. See Interview of David Grosh, former director, American International Center, in Washington, D.C. (February 8, 2005).

²³ Deposition of Brian Mann, former director, American International Center, in Washington, D.C. (March 31, 2005); Interview of David Grosh, former director, American International Center, in Washington, D.C. (February 8, 2005).

²⁴ Deposition of Brian Mann, former director, American International Center, in Washington, D.C. (March 31, 2005); Interview of David Grosh, former director, American International Center, in Washington, D.C. (February 8, 2005).

²⁵ Deposition of Brian Mann, former director, American International Center, in Washington, D.C. (March 31, 2005).

²⁶ *Id.*

²⁷ *Id.*

²⁸ *Id.*

cles is all [he] was doing for AIC or CCS.”²⁹ He was also given the authority to sign checks on behalf of AIC.³⁰

Grosh recalled that Scanlon enticed Mann and him to work for AIC by promising, among other things, that AIC would pay for both to go surfing at the island of St. Barts.³¹ Grosh never took that trip.³² But, Scanlon paid for Mann to fly to St. Barts about four times.³³

Grosh and Mann, who served as AIC’s only directors, recalled that AIC had fewer than five meetings of its board—all of which occurred in 2001.³⁴ Grosh recalled that Scanlon characterized those meetings as “a paperwork formality.”³⁵ Grosh did not recall what, if any, business was discussed at those meetings: “There was nothing to discuss ... As far as I knew, AIC had no business to discuss.”³⁶ Referring to AIC’s being held out as an international think tank, Grosh quipped, “If AIC was a think tank, I sure don’t know what we were thinking about.”³⁷ Mann could only recall discussing Scanlon’s acquiring, and his own cleaning, office space for AIC, and Grosh’s departure from the organization.³⁸

Records obtained by the Committee indicate that AIC held only two board meetings—on September 30 and October 30, 2001.³⁹ Apparently, the “business” they discussed included Grosh’s “relinquish[ing] his position” with AIC and installing Mann as the “Director of day to day [sic] operations of AIC”, for which he was to receive \$1500 a month.⁴⁰

By September 2001, Grosh concluded that “something was not quite right”: Scanlon had bought two houses in Rehoboth—both of which costs millions of dollars.⁴¹ Grosh recalls, “Scanlon was always throwing around money; no one makes that much money over such a short period of time.”⁴² Grosh was also uncomfortable with the aspect of Scanlon’s business that related to Indian gaming.⁴³ Therefore, Grosh decided to leave.⁴⁴ For his “services,” Grosh was compensated in total \$2,500 to \$3,000.⁴⁵

After Grosh left AIC, Mann was, as far as he knew, its only employee.⁴⁶ In fact, according to Mann, no one other than Grosh and

²⁹ *Id.*

³⁰ *Id.*

³¹ Interview of David Grosh, former director, American International Center, in Washington, D.C. (February 8, 2005).

³² *Id.*

³³ Deposition of Brian Mann, former director, American International Center, in Washington, D.C. (March 31, 2005).

³⁴ Interview of David Grosh, former director, American International Center, in Washington, D.C. (February 8, 2005); See also Deposition of Brian Mann, former director, American International Center, in Washington, D.C. (March 31, 2005).

³⁵ Interview of David Grosh, former director, American International Center, in Washington, D.C. (February 8, 2005).

³⁶ *Id.*

³⁷ *Id.*

³⁸ Deposition of Brian Mann, former director, American International Center, in Washington, D.C. (March 31, 2005).

³⁹ Capitol Campaign Strategies document production (BB/CCS 023748–49) (September 30, 2001); Capitol Campaign Strategies document production (BB/AIC 000634) (October 30, 2001).

⁴⁰ Capitol Campaign Strategies document production (BB/CCS 023748) (September 30, 2001).

⁴¹ Interview of David Grosh, former director, American International Center, in Washington, D.C. (February 8, 2005).

⁴² *Id.*

⁴³ *Id.*

⁴⁴ *Id.*

⁴⁵ *Id.*

⁴⁶ Deposition of Brian Mann, former director, American International Center, in Washington, D.C. (March 31, 2005).

himself was ever paid by AIC as an employee.⁴⁷ Moreover, the only time Mann recalled Grosh “ever doing anything was helping me literally put a desk together.”⁴⁸ Otherwise, he had “no idea” what Grosh did.⁴⁹

Mann, who Scanlon also publicly held out as a director of AIC, was (and remains) unsure about exactly what AIC did.⁵⁰ Mann testified that “[a]ll [he] knew was that [he] was providing newspaper clips,” as instructed.⁵¹ Mann readily conceded that his professional and educational background, like Grosh’s, were completely unrelated to the purported mission of AIC.⁵² Mann was at AIC until late 2002—at which time he started working for CCS and, subsequently, for other Scanlon-controlled entities including Scanlon Venture Capital (“SVC”) and Scanlon Capital Management (“SCM”).⁵³ Convinced that Scanlon was “a fraud,” Mann stopped working for SCM in October 2005.⁵⁴

Christopher Cathcart, who served as Scanlon’s top assistant and was therefore in a position to opine about AIC with authority, said he considered AIC an alter ego of Scanlon.⁵⁵ Mann agreed that, although he was getting paid by AIC, he was in fact working for Scanlon.⁵⁶ In his mind, the two were the same.⁵⁷

C. MAKING IT LOOK REAL—ABRAMOFF HAS AIC POST A WEBSITE

Despite Cathcart’s professed understanding of the nature of AIC, he and Abramoff worked together to, among other things, develop its website, apparently to make AIC look like a legitimate, established organization. Early in 2002, Scanlon asked Cathcart and Amy Biederman, another CCS associate, to help develop a website for AIC.⁵⁸ While Cathcart and Biederman worked on the website’s content, Abramoff had an outside contractor program and design it.⁵⁹ Indeed, it appears that Abramoff may have come up with the idea for the website—reaching out to a contractor named Benjamin Mackler of MackDesign Studios about the prospect of developing it, on January 19, 2002:

Ben, I need to set up a web site for the American International Center, which should have all sorts of goodies to make it look real. It should have links to various other think tanks, including ISIS in Malaysia, the statehood movement in Puerto Rico, Heritage, Americans for Tax Reform, National Center for Public Policy Research, Cato Institute, Toward Tradition. Can you create something?

⁴⁷ *Id.*

⁴⁸ *Id.*

⁴⁹ *Id.*

⁵⁰ *Id.*

⁵¹ *Id.*

⁵² *Id.*

⁵³ *Id.*

⁵⁴ *Id.*

⁵⁵ Interview of Christopher Cathcart, former associate, Capitol Campaign Strategies, in Washington, D.C. (May 5, 2005).

⁵⁶ Deposition of Brian Mann, former director, American International Center, in Washington, D.C. (March 31, 2005).

⁵⁷ *Id.*

⁵⁸ Interview of Christopher Cathcart, former associate, Capitol Campaign Strategies, in Washington, D.C. (May 5, 2005).

⁵⁹ *Id.*

What would the budget be? We'd need a section about "who we are", "contact us", our leadership, etc.⁶⁰

In response to a proposal from Mackler to develop a website for \$2,750, Abramoff asked, "[C]an you get things moving? Can you see what kind of domain name you can get: AIC.org, or AmericanInternationalCenter.org?"⁶¹

Mackler returned with a request to register a domain name for AIC and questions about the website's design. In response, Abramoff answered, "Yes to all."⁶²

Subsequently, he instructed Mackler to call Scanlon, who in turn told Mackler to contact Cathcart. Mackler turned again to Abramoff, saying that Scanlon chose a more expensive option for the website.⁶³

Abramoff replied, "The 3500 option is fine with me. let's [sic] do it."⁶⁴

Cathcart testified that ultimately he and Biederman spent only about an hour working on the website.⁶⁵ Cathcart recalled that Scanlon provided him with some information that he used for the website, including that it was "an international company" with "international clients"—namely Malaysia and Puerto Rico⁶⁶. Cathcart believed that he may have been given some written material for the website.⁶⁷ If so, he believed that it would have included the articles of incorporation, the bylaws, and other organizational documents.⁶⁸ Cathcart likewise recalled not drafting a mission statement, which he said would have been provided to him.⁶⁹ Otherwise, according to Cathcart, he and Biederman "didn't have much to go on."⁷⁰ Cathcart noted that they gave Scanlon the text that they developed for final approval.⁷¹ On or about January 21, 2002, Abramoff apparently reached out to Cathcart about the website, with Cathcart responding, "10-4. Should have most of the content tomorrow."⁷²

On a request from either Scanlon or Abramoff, on February 4, 2002, Cathcart forwarded a final copy of the text to Abramoff for comments and edits. Abramoff congratulated Cathcart, "Thanks, Chris. I have seen it. great [sic] work. Did Mike [Scanlon] give you the list of items the firm wants regarding AIC?"⁷³ On February 13, 2002, Abramoff followed-up with Cathcart to make sure that Mackler got paid.⁷⁴

⁶⁰ Email between Jack Abramoff, Greenberg Traurig, and Ben Mackler, Mack Design (no Bates number) (January 19, 2002) (emphasis added).

⁶¹ *Id.*

⁶² *Id.*

⁶³ *Id.*

⁶⁴ *Id.*

⁶⁵ Interview of Christopher Cathcart, former associate, Capitol Campaign Strategies, in Washington, D.C. (May 5, 2005).

⁶⁶ *Id.*

⁶⁷ *Id.*

⁶⁸ *Id.*

⁶⁹ *Id.*

⁷⁰ *Id.*

⁷¹ *Id.*

⁷² Email between Christopher Cathcart, Capitol Campaign Strategies, and Jack Abramoff, Greenberg Traurig (no Bates number) (January 31–February 4, 2002).

⁷³ Email from Jack Abramoff, Greenberg Traurig, to Christopher Cathcart, Capitol Campaign Strategies (no Bates number) (February 4, 2002).

⁷⁴ Email from Jack Abramoff, Greenberg Traurig, to Christopher Cathcart, Capitol Campaign Strategies (no Bates number) (February 13, 2002).

In its final form, the website set forth AIC's mission statement. It described AIC as "a Delaware-based corporation with the global minded purpose of enhancing the methods of empowerment for territories, commonwealths, and sovereign nations in possession of and within the United States."⁷⁵ In each of their depositions and interviews with Committee staff, Grosh, Mann and Cathcart said they had no idea what this meant.⁷⁶

The website also touted AIC as (1) "a premiere international think tank"; (2) "determined to influence global paradigms in an increasingly complex world."; (3) a "public policy foundation"; (4) founded "under the high powered directorship of David A. Grosh and Brian J. Mann"; (5) "[w]hile only recently incorporated ... striving to advance the cause of greater international empowerment for many years"; (6) "using 21st century technology and decades of experience to make the world a smaller place"; (7) "bringing great minds together from all over the globe"; (8) "seek[ing] to expand the parameters of international discourse in an effort to leverage the combined power of world intellect."; and (9) comprised of an "expert team."⁷⁷ To the extent that Grosh, Mann and Cathcart could speak to the truth of each of those representations, each agreed that they were false.⁷⁸

During his interview with Committee staff, Cathcart, who described his role at CCS through this period as a "go-fer" and doing "research and stuff,"⁷⁹ admitted to being embarrassed about writ-

⁷⁵ *American International Center* (no longer available) <<http://www.amercent.org/mision.html>>.

⁷⁶ See Interview of David Grosh, former director, American International Center, in Washington, D.C. (February 8, 2005); Deposition of Brian Mann, former director, American International Center, in Washington, D.C. (March 31, 2005); Interview of Christopher Cathcart, former associate, Capitol Campaign Strategies, in Washington, D.C. (May 5, 2005).

⁷⁷ *American International Center* (no longer available) <<http://www.amercent.org/mision.html>>.

⁷⁸ See Interview of David Grosh, former director, American International Center, in Washington, D.C. (February 8, 2005); Deposition of Brian Mann, former director, American International Center, in Washington, D.C. (March 31, 2005); Interview of Christopher Cathcart, former associate, Capitol Campaign Strategies, in Washington, D.C. (May 5, 2005).

⁷⁹ Interview of Christopher Cathcart, former associate, Capitol Campaign Strategies, in Washington, D.C. (November 5, 2004). Supposed AIC director Brian Mann and former Abramoff associate Stephanie Leger Short maintained in their deposition and interview, respectively, that Cathcart was by no means a "go-fer." Deposition of Brian Mann, former director, American International Center, in Washington, D.C. (March 31, 2005); Interview of Stephanie Leger Short, former associate, Greenberg Traurig, in Washington, D.C. (August 18, 2005). In fact, separately, both described Cathcart as Scanlon's "right-hand man." Deposition of Brian Mann, former director, American International Center, in Washington, D.C. (March 31, 2005); Interview of Stephanie Leger Short, former associate, Greenberg Traurig, in Washington, D.C. (August 18, 2005) (limiting "right hand man" observation to CCS' work for Louisiana Coushatta). Mann also described Cathcart as "the manager of the D.C. office" and CCS' "director of operations." Deposition of Brian Mann, former director, American International Center, in Washington, D.C. (March 31, 2005). Tigua representative Marc Schwartz, who directly interacted with Cathcart on the Tribe's behalf, described Cathcart as Scanlon's "gotta-make-what-Scanlon-sold, work" guy. Interview with Marc Schwartz, president, Partners Group Consultants, in Washington, D.C. (November 10, 2004). Mann insisted that Cathcart "hired and fired" and "managed whatever client situations we had at the time—managed the D.C. office." Deposition of Brian Mann, former director, American International Center, in Washington, D.C. (March 31, 2005). Moreover, Mann remembered Cathcart "being the manager, being in charge of the office when Scanlon wasn't there, or even when Scanlon was there, I guess, directing the different folks to do what they needed to do." *Id.* Mann also recalled that Cathcart did "a lot of client management, like he interacted with the Tribes directly, either through whatever contact people the Tribes had or the chiefs or whoever ... that person may have been." *Id.* From his first-hand experience, Mann also "assum[ed] [Cathcart had] a hand with Scanlon in coming up with [grassroots campaign] strategies and execution of those strategies." *Id.* Cathcart also provided Mann instruction and guidance on what he should be researching. *Id.* Mann agreed that "when Scanlon wasn't around, [Cathcart] was The Man." *Id.* Mann's account is corroborated by, among other things, Cathcart's robust role in assisting the Slate of Eight's successful campaign for the Tribal

ing AIC's web page but noted that Biederman "developed the puffery."⁸⁰ Cathcart never thought a client would see AIC's website, although he never explained how the website would otherwise be used.⁸¹ According to Cathcart, "[e]veryone who worked with AIC knew it was the same thing as Mike [Scanlon]."⁸² In his interview with Committee staff, Cathcart claimed that he did not even know why Scanlon wanted a website.⁸³ Cathcart claimed that he thought Scanlon wanted a website "like he wanted the Range Rover."⁸⁴ As described below, those Tribes that Abramoff and Scanlon directed to pay to and through AIC, did so to their detriment. Therefore, any role that Cathcart may have had in helping to facilitate payments by the Tribe to AIC, or to any other "gimme five" entity for that matter, may be an area ripe for further inquiry.⁸⁵

On at least one occasion, Abramoff's employer, Greenberg Traurig, apparently tried to get information about AIC. Sometime in 2002, the director of the firm's national lobbying practice, Fred Baggett, first heard about AIC.⁸⁶ According to Baggett, Greenberg Traurig was "to jointly represent [it] with a gentleman named Khaled Saffuri" on "Malaysian-related interests and issues."⁸⁷ At that time, Baggett was unaware of who owned the company; Abramoff represented to him that AIC was "an established Washington area-based think tank like ... the Heritage Center or any other number of think tanks."⁸⁸ Abramoff also told Baggett that AIC "had a number of interests and were involved in a broad range of issues. One of the issues that they were involved in and for which we were retained to assist them with were enhancing business, economic development opportunities in Malaysia, and that they were receiving funds from Malaysian business interests to further their and advance their, their efforts with the U.S. Govern-

Council of the Saginaw Chippewa Indian Tribe, discussed in Part 1, Chapter 3, Section of this Report, entitled "Saginaw Chippewa Tribe of Michigan: 'Slate of Eight'—Abramoff and Scanlon's Trojan Horse." Dramatic growth in Cathcart's responsibilities under Scanlon is reflected in the considerable increase in his compensation: in April 2001, when Cathcart apparently started working with Scanlon, he drew a salary of \$44,540 plus an additional \$35,000 in bonus. Letter from Charles Leeper, Esq., Spriggs & Hollingsworth, to Pablo E. Carrillo, Chief Investigative Counsel, Senate Committee on Indian Affairs (November 12, 2004). But, by December 2003, when Cathcart left CCS, he received a salary of \$105,000, plus a bonus approximating \$390,000. *Id.* During his employment with Scanlon, Cathcart received a total of about \$740,000 in compensation. *See id.*

⁸⁰ Interview of Christopher Cathcart, former associate, Capitol Campaign Strategies, in Washington, D.C. (May 5, 2005).

⁸¹ *Id.*

⁸² *Id.*

⁸³ *Id.*

⁸⁴ *Id.*

⁸⁵ Other examples of such activities include Cathcart's providing the database "access page" that Democracy Data & Communications ("DDC") designed for Capitol Campaign Strategies, to another vendor. As described above, that vendor apparently used that information, which was proprietary to DDC, to develop a far less functional database designed to mimic DDC's considerably more capable product. Scanlon "sold" the less functional version to at least one of the Tribes for millions. Also, on May 1, 2003, as Abramoff and Scanlon's financial relationship was apparently waning, they schemed to deceive the Louisiana Coshatta into paying them a total of \$2,000,000. In furtherance of that scheme, which they executed successfully, Scanlon had the Tribe pay an entity he controlled called Atlantic Research and Analysis ("ARA"). This transaction is discussed more fully in Part 2, Chapter 3, Section F, entitled "Capital Athletic Foundation: In 2003 Abramoff Funnels Tribal Money Through Conduits to CAF." Whether Cathcart knew, or should have known, that some of his activities were helping Abramoff and Scanlon further their "gimme five" scheme on the Tribes remains unclear.

⁸⁶ Interview of Fred Baggett, Chair, National Government Affairs Practice, Greenberg Traurig, in Washington, D.C. (September 29, 2005).

⁸⁷ *Id.*

⁸⁸ *Id.* (reflecting that Abramoff informed Baggett about AIC).

ment, and that's what, we were hired by AIC to assist them in that.”⁸⁹

At some point, Greenberg Traurig “asked Jack to explain [the] AIC and the nature of the relationship” to “ensure that we [did] not have a problem [with the Foreign Agents Registrations Act (FARA)].”⁹⁰ In that context, it appears that Scanlon withheld important information regarding AIC from the firm. In fact, in a response to queries from Greenberg Traurig to AIC, on February 7, 2002, Scanlon directed Cathcart to “[i]nsertr [sic] somewhere”: “While Mr. Abnramoof [sic] and His [sic] team have been an unbelievebal [sic] assest [sic] tou [sic] our organization, we feel that if as a vendor of ours if we are presented with such an unexplicalbe [sic] line of questioning again, we will unfortuantley [sic] review and vote on your continuing representation at our next board meeting.”⁹¹ The letter that was apparently sent back to Greenberg Traurig was drafted under the signature of one of AIC’s supposed directors, Brian J. Mann. Noticeably absent from the letter was any indication that Scanlon in fact owned or controlled the company; that the firm’s Tribal clients were making payments directly to AIC; or that Abramoff would receive a share of those proceeds that the Tribes paid to AIC. This Report explicates each of those issues below.

D. HOW ABRAMOFF AND SCANLON USED CONDUITS TO REPRESENT THE TRIBES

Just as Abramoff and Scanlon used CCS and the Capital Athletic Foundation (“CAF”) to wrongfully extract “gimme five” proceeds from the Tribes so, too, did they use AIC. The Choctaw and, more significantly, the Louisiana Coushatta were injured by Abramoff and Scanlon’s use of AIC as a “gimme five” vehicle. Understanding how Abramoff and Scanlon were able to do so requires understanding, among other things, how historically Abramoff and Scanlon had those Tribes use conduits to implement their grassroots strategies.

As described more fully in those sections of this Report addressing the Choctaw and the Louisiana Coushatta, from 1998 through 2001, Abramoff and Scanlon had each Tribe use conduits to implement their grassroots campaigns. Over time, those Tribes became accustomed to (1) paying substantial fees for their grassroots activities and (2) paying those fees to or through conduits.

As those sections indicate, the vendor that Abramoff and Scanlon used, and relied on, the most to implement those campaigns was former Christian Coalition Executive Director and political strategist Ralph Reed.⁹² While working with Abramoff from 1999 through 2001, Reed conducted a variety of grassroots activities in support of the interests of Abramoff gaming clients, including, telemarketing (patch-through, tape-recorded messages and call-to-ac-

⁸⁹ *Id.*

⁹⁰ *Id.*

⁹¹ Email from Michael Scanlon, Capitol Campaign Strategies, to Christopher Cathcart, Capitol Campaign Strategies (no Bates number) (February 7, 2002).

⁹² A detailed description of Abramoff’s business relationship with Reed *vis-a-vis* the Tribes and, in particular, how Abramoff relied on Reed to conduct grassroots activities on behalf of his Tribal gaming clients, is set forth in Part I, Chapter 1, Section D, of this Report, entitled “Mississippi Band of Choctaw Indians: Substantial Fees and Conduit Organizations.”

tion phone calls), targeted mail, legislative counsel and local management, as well as rallies and petitions.

A May 10, 1999, email between Abramoff and one of his assistants indicates that Preston Gates sent payments to Reed totaling \$1,303,903, apparently from Abramoff's clients.⁹³

But, by 2001, Abramoff or Scanlon had the Tribes using conduits which they owned or controlled, most notably AIC. As the following reflects, from 2001 through 2003, Abramoff or Scanlon directed both the Choctaw and the Louisiana Coushatta to pay AIC a total of \$6,308,854.

PAYMENTS FROM LOUISIANA COUSHATTA AND CHOCTAW TO AIC

Choctaw Payments to AIC

1.	2/27/01	\$200,000
2.	4/9/01	150,000
3.	5/2/01	175,000
4.	5/11/01	960,654
		<hr/>
		1,485,654
		<hr/>
1.	2/22/02	1,000,000
2.	12/11/02	170,000
		<hr/>
		1,170,000
		<hr/>
		<hr/>
	Total	2,655,654
		<hr/>
		<hr/>

Louisiana Coushatta Payments to AIC

1.	3/16/01	400,000
2.	3/21/01	258,000
3.	3/30/01	298,000
4.	4/27/01	397,200
5.	4/9/03	2,300,000
		<hr/>
	Total	3,653,200
		<hr/>
		<hr/>
	Grand Total of Payments from Louisiana Coushatta and Choctaw to AIC	6,308,854
		<hr/>
		<hr/>

The following⁹⁴ suggests that in 2001 and early 2002 much of that money ultimately went to entities owned or controlled by Reed.

PAYMENTS BY SCANLON-CONTROLLED ENTITIES TO REED-CONTROLLED ENTITIES

Payments from AIC to Reed-Controlled Entities

3/16/01	Century Strategies	\$45,000
3/16/01	Century Strategies	350,000
3/16/01	Century Strategies	50,000
3/16/01	Century Strategies	100,000
3/22/01	Century Strategies	200,000

⁹³ Email from Jack Abramoff, Preston Gates Ellis & Rouvelas Meeds, to [REDACTED] (GTG-E000018933) (May 10, 1999).

⁹⁴ The Louisiana Coushatta made this payment through Southern Underwriters, an apparently moribund insurance firm owned or controlled by former Louisiana Coushatta casino CEO Aubrey Temple. A discussion of this transaction is contained *infra* in Part 1, Chapter 2, entitled "Coushatta Tribe of Louisiana."

4/03/01	Century Strategies	198,000
4/20/01	Century Strategies	100,000
4/30/01	Century Strategies	398,000
5/02/01	Century Strategies	100,000
5/10/01	Century Strategies	750,000

Total	<u>\$2,291,000</u>
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Payments from CCS to Reed-Controlled Entities

6/29/01	Century Strategies	100,000
7/01/01	Capitol Media	618,000
7/16/01	Century Strategies	46,350
8/1/01	Century Strategies	47,000
11/08/01	Capitol Media	100,000
11/09/01	Capitol Media	350,000
12/31/01	Century Strategies	250,000
2/19/02	Capitol Media	51,679
2/25/02	Capitol Media	60,000
2/25/02	Capitol Media	100,000

Total	<u>\$1,723,029</u>
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Grand Total of all Payments by Scanlon-Controlled Entities to Reed-Controlled Entities

Grand Total	<u>\$4,014,029</u>
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As the foregoing indicates, from March through May 2001, AIC paid one of Reed's companies, called Century Strategies, \$2,291,000. And, from June 2001 to February 2002, another Scanlon-controlled entity, CCS paid Century Strategies and another company owned by Reed called Capitol Media \$1,723,029, for a total of \$4,014,029.

But, as early as November 2001, things had begun to change. With a history of successful grassroots projects behind them and Abramoff or Scanlon having had the Tribes pay to or through entities that they owned or controlled, they apparently began to squeeze Reed out and started to keep most of the money paid by the Tribes for themselves.⁹⁵

By December 18, 2001, Abramoff appeared resolved to pushing Reed out, writing to Scanlon, "Next year, we need to give [Reed] a pittance and we need to keep most of this ourselves."⁹⁶

On January 4, 2002, Abramoff and Scanlon expressed concerns about work that Reed did for one of their Tribal clients. About that

⁹⁵ See, e.g., Email from Michael Scanlon, Capitol Campaign Strategies, to Jack Abramoff, Greenberg Traurig (Bates number 001139446) (November 25, 2001). This email indicates that Scanlon at least proposed to conduct many of the grassroots activities that Reed first provided for Abramoff's Tribal lobbying clients. In describing what he intended to do for the Choctaw on a particular grassroots project, Scanlon told Abramoff: "[H]ere are the broad strokes of what I am going to do. I am putting our own field operation in [REDACTED] to cover all three sites. I am turning [sic] on phones hitting reps and dems [sic], I am launching a negative ad campaign against [REDACTED] and [REDACTED], and others. This will be big, and now that the slots are in, its gonna take some time to be effective." On December 10, 2001, Abramoff expressed concern about the budget requests Reed wanted him to submit to his Tribal clients: "Ralph, they are going to faint when they see these numbers. They will want to know why we have not built up any residual strength for the tons of money we have already spent. Give me some ammo on that and I'll do my best." Email from Jack Abramoff, Greenberg Traurig, to Ralph Reed, Century Strategies (GTG-E000019059) (December 10, 2001).

⁹⁶ Email from Jack Abramoff, Greenberg Traurig, to Michael Scanlon, Capitol Campaign Strategies (GTG-E000023792) (December 18, 2001).

project, Scanlon asked, “Did Ralph spend all them [sic] money he was given to fight this—or does he have some left?”⁹⁷

Abramoff responded, “That’s a silly question! He “spent” it all the moment it arrived in his account. He would NEVER admit he has money left over. Would we?”⁹⁸

Scanlon replied, “No—but Id [sic] like to know what the hell he spent it on—he didn’t even know the dam [sic] thing was there—and didn’t do shit to shit [sic] to shut it down!”⁹⁹

Abramoff decreed, “I agree. He is a bad version of us! no [sic] more money for him.”¹⁰⁰

Days later, on January 8, 2002, while reviewing their “gimme five” income for January 2002, Abramoff had an idea as to how he and Scanlon could dramatically reduce their overhead. His suggestion intended to completely cut out Reed: “[W]e are spending over \$10M with other people! We have to buy mail house, phone house, etc. so we get part of that one too!”¹⁰¹

Scanlon agreed, “[Y]our [sic] right—we have to move fast to lock in phones and—mail. I think we can cut 5mil [sic] right off the top of our outgoing expenses that way just to start.”¹⁰²

Abramoff concurred, “Let’s do it fast so we can stop throwing away money.”¹⁰³

By early 2002, Abramoff’s business arrangement with Reed *vis-a-vis* his Tribal clients seemed to have run its course. Regarding a \$50,000 payment to Reed for work supporting the Choctaw, on February 7, 2002, Abramoff admonished Scanlon to “go ahead and pay him so I can get him off my back.”¹⁰⁴ Documents in the Committee’s possession reflect that the last payment Abramoff made to Reed, through any entity owned or controlled by Scanlon, regarding any of Abramoff’s Tribal clients, was on or about February 25, 2002.

Under the original paradigm, most of the money these Tribes paid (at Abramoff or Scanlon’s request) to or through conduits seemed to have gone to grassroots activities conducted or coordinated by Reed—with a percentage taken by Reed as a “manage-

⁹⁷ Email between Jack Abramoff, Greenberg Traurig, and Michael Scanlon, Capitol Campaign Strategies (GTG-E00001817) (January 4, 2002).

⁹⁸ *Id.* (emphasis in original).

⁹⁹ *Id.*

¹⁰⁰ *Id.*

¹⁰¹ Email between Jack Abramoff, Greenberg Traurig, and Michael Scanlon, Capitol Campaign Strategies (Bates number 305641) (January 8, 2002).

¹⁰² *Id.*

¹⁰³ *Id.*

¹⁰⁴ Email from Jack Abramoff, Greenberg Traurig, to Michael Scanlon, Capitol Campaign Strategies (GTG-E000018505) (February 7, 2002). On July 23, 2002, Reed provided Abramoff with information that suggested the need to launch a grassroots campaign to squelch support for a casino in DeSoto Parish, Louisiana. Seeing a business opportunity for himself and Scanlon, Abramoff told Scanlon, “Forget Ralph, but this poll is very interesting. Can you get to [Louisiana Coushatta Tribal Council member] William [Worfel] and get us some \$ so we can fight this?” Email from Jack Abramoff, Greenberg Traurig, to Michael Scanlon, Capitol Campaign Strategies (GTG-E000020112) (July 23, 2002). Similarly, on July 24, 2002, with a Texas federal judge having shut down the Alabama-Coushatta’s casino in Livingston, Reed provided Abramoff with information about the possibility that the Alabama-Coushatta might launch a legislative initiative to have its casino reopened. Seeing a potential business opportunity, Abramoff immediately forwarded the information to Scanlon: “Forget about Ralph, but you should call [Louisiana Coushatta Chairman] Lovelin [Poncho] and [Tribal Council member] William [Worfel] ... and claim victory on this one, but warn that the [Alabama-Coushatta] are not going away ... we need more \$\$\$\$.” Email from Jack Abramoff, Greenberg Traurig, to Michael Scanlon, Capitol Campaign Strategies (GTG-E000020107) (July 24, 2002).

ment fee” or similar charge.¹⁰⁵ But after February 2002, without the Tribes’ knowledge or consent, most of the money that they paid to or through those entities went into Abramoff’s and Scanlon’s pockets—with only a fraction going to the underlying grassroots effort. Having been accustomed to paying high fees for grassroots work in the past, the Tribes were not suspicious.¹⁰⁶ How Abramoff and Scanlon succeeded in using AIC in furtherance of their “gimme five” scheme is discussed below.

E. AIC AS A “GIMME FIVE” ENTITY

As early as May 2001, Abramoff and Scanlon were extracting “gimme five” income from payments made by the Choctaw through AIC. Abramoff informed Scanlon then, “[REDACTED] is active again. I am going to try to get us \$175K. \$100K to Ralph; \$25K to contributions (\$5K immediately to Conservative Caucus); rest gimme five.”¹⁰⁷

But, the Tribe that would be most injured as a result of its payments to AIC would be the Louisiana Coushatta. With his businesses and private charity apparently facing financial difficulty, on March 30, 2003, Abramoff told his tax advisor Gail Halpern that he expected some money to come in: “I have \$1M coming in (I hope directly to CAF or Eshkol) probably next week, and \$1M due within the next 2 weeks to Kaygold. Both from CCS. How long will this money last both for the school and the restaurants?”¹⁰⁸ Needless to say, all this would be Tribal money.

Ultimately, Abramoff decided not to use CCS; they elected to use AIC. And, to induce the Louisiana Coushatta into paying AIC, Scanlon wrote then-Tribal Councilman William Worfel in a Strategy Memorandum, on or about April 18, 2003, “We sent you and [sic] Invoice [sic] from the AIC which is merely an entity I direct which was used to conduct public relations activities for various clients. As we discussed, the AIC will pay for operations conducted by CCS (myself and my team) and Jack or others vendors and staff.”¹⁰⁹

So, on or about April 9, 2003, the Louisiana Coushatta paid AIC \$2,300,000. But, the Tribe was never told that payments made by the Tribe to AIC would go to Scanlon and Abramoff.¹¹⁰ Quite the contrary, from Abramoff, Louisiana Coushatta Tribal representatives understood that AIC was an entity that supported anti-gam-

¹⁰⁵ Documents, however, indicate that at least with respect to one project, Reed received more than simply the management fee he itemized on his invoices: apparently, he and an individual named Neal Rhoades shared additional commissions derived from profits that were built into costs charged by vendors (associated with Reed) to Preston Gates, which were likely expensed to the Tribes. Ralph Reed document production (no Bates number) (undated) (“Preston Gates—[REDACTED] Gambling Project Reconciliation as of June 13, 1999”). Those vendors apparently included, among others, National Media and Millennium Marketing. *Id.*

¹⁰⁶ Interview of Nell Rogers, planner, Mississippi Band of Choctaw Indians, in Choctaw, Mississippi (April 27–29, 2005).

¹⁰⁷ Email from Jack Abramoff, Greenberg Traurig, to Michael Scanlon, Capitol Campaign Strategies (GTG–E0001321307) (May 2, 2001).

¹⁰⁸ Email from Jack Abramoff, Greenberg Traurig, to Gail Halpern, May & Barnhard, P.C. (GTG–000012166) (March 28, 2003).

¹⁰⁹ Capitol Campaign Strategies document production (BB/LC 007325) (April 18, 2003). The request in this memorandum (4/18) appears to have resulted in the Louisiana Coushatta’s payment of \$2,300,000 to AIC (on or about 4/9). So, the date of this document relative to the date of the resulting payments suggests that the date on the memorandum is probably a typographical error.

¹¹⁰ Interview with Kathryn Van Hoof, former counsel, Coushatta Tribe of Louisiana, in Lecompte, Louisiana (September 21, 2005).

ing efforts, which the Tribe could support.¹¹¹ The Tribe was misled: on April 13, 2003, AIC paid Abramoff \$991,000, through his alter ego, Kaygold.¹¹²

In an April 18, 2003, strategy memorandum, Scanlon also told Worfel, “[o]n the financial side, the lion’s share of your effort this year is for database build up, and voter targeting, and staff time. We currently have seven staff members working on this project including myself. Most of the staff will be exclusively working on your program for the rest of the year. Jack is also involved heavily on a daily/weekly basis.” Scanlon’s suggestion to Worfel about where the “lion’s share” of the Tribe’s money would go was also misleading: on April 22, 2003, Scanlon routed the \$1,300,000 left over from the Tribe’s \$2,300,000 payment to AIC, to CCS.¹¹³

AMERICAN INTERNATIONAL CENTER ACCOUNT SNAPSHOT

Date	Description	To/From	Amount
4/1/2003	Balance		\$14,900.13
4/9/2003	Wire Transfer	Coushatta	2,300,000.00
4/13/2003	Check 1103	Kaygold	(991,000.00)
4/18/2003	Check 1113	Scanlon	(15,000.00)
4/22/2003	Wire Transfer	CCS	(1,300,000.00)
4/29/2003	Closing Balance		1,083.93

From there, between May 1, 2003, and May 5, 2003, Scanlon executed a series of shareholder draws for apparently purely personal expenses that completely extinguished the Tribe’s payment to AIC. Those transactions are explicated below.¹¹⁴

CAPITOL CAMPAIGN STRATEGIES ACCOUNT SNAPSHOT

Date	Description	To/From	Amount
4/1/2003	Balance		\$1,062,845.58
4/14/2003	Taxes Payable	DC	(214,018.00)
4/21/2003	Shareholder Draw	Scanlon	(100,000.00)
4/22/2003	Wire Transfer	Coushatta/AIC	1,300,000.00
4/22/2003	Prof. Campaign; LA	Basswood Research	(15,600.00)
5/1/2003	Balance		1,844,678.59
5/1/2003	Shareholder Draw; 25 Tidewater; 2310	Tony Beto, Inc.	(21,594.00)
5/1/2003	Shareholder Draw; 2311	Dockety Design	(88,724.00)
5/2/2003	Shareholder Draw; 2312	Lin Sang Logistics	(150,000.00)
5/5/2003	Shareholder Draw	Michael Scanlon	(150,000.00)
5/5/2003	Shareholder Draw	Michael Scanlon	(991,000.00)
5/5/2003	Balance		427,174.71

As the foregoing indicates, there were five such “shareholder draws”: May 1, 2003, to Tony Beto, Inc. for \$21,594; May 1, 2003, to Dockety Design for \$88,724; May 2, 2003, to Lin Sang Logistics for \$150,000; and two payments, dated May 5, 2003, to Michael Scanlon for \$150,000 and \$991,000.

¹¹¹ *Id.*

¹¹² Diehl & Company document production (D00411–512) (undated) (General Ledger, Capitol Campaign Strategies).

¹¹³ *Id.*

¹¹⁴ These entries are taken from CCS’ accounting ledger and cross-referenced with other information in the possession of the Committee. Of all vendor transactions reflected in the ledger, only vendor transactions greater than or equal to \$25,000 or traceable to any Tribe are included.

The Committee has been able to locate a Tony Beto in Lewes, Delaware. Apparently an architect, Beto has been described as having knowledge and experience with zoning procedures, particularly in Sussex County, Delaware, where Scanlon made some major real estate purchases.¹¹⁵ Likewise, the Committee found a company called Dockety Design Construction, a single-family housing contractor located in Rehoboth Beach, Delaware. Apparently, it specializes in home remodeling and new home building.¹¹⁶ Finally, the Committee located a company called Linsang Logistics LLC in Silver Spring, MD. Apparently Linsang creates technology-based companies “that expand global access to information” and charters its private jet.¹¹⁷ Given that the foregoing charges are likely unrelated to any work done for the Louisiana Coushatta, they are likely purely personal in nature. With the original \$2,300,000 that the Louisiana Coushatta paid AIC just about entirely extinguished, the Committee has seen no evidence that the Tribe received the intended benefit for this very large payment.

According to media reports, Scanlon and Abramoff may have used AIC for other illicit purposes, including circumventing requirements under the Foreign Agents Registration Act (“FARA”), particularly with respect to the Embassy of Malaysia.¹¹⁸ However, those activities are unrelated to the Tribes’ allegations of misconduct. Accordingly, while the Committee has information corroborative of some of those media reports,¹¹⁹ the Committee has arrived at no definitive conclusions regarding those activities.

F. CONCLUSION

Among the more interesting of Abramoff and Scanlon’s “gimme five” entities, that is, entities owned or controlled by Abramoff or

¹¹⁵ See Brian Reynolds-Hughes, *Proposed \$35M amphitheater coming to Sussex?*, Cape Gazette, December 31, 2002, <http://www.beachpaper.com/storiesmorgue/arts/2003arts/amphitheater121302.html>; Chris Barrish, *Abramhoff cohort spent millions on Sussex homes*, The News Journal, May 14, 2006, <<http://www.delawareonline.com/apps/pbcs.dll/article?AID=/20060514/NEWS/605140367/1006>>.

¹¹⁶ Planetblueprints.com ‘Custom Homes For a More Beautiful Planet’ (visited February 14, 2006) <http://planetblueprints.com/html/about_us.html>; *Rehoboth Beach business directory* (visited Feb. 14, 2006) <http://www.rehobothbeach.com/bus_buildersremodel.asp>.

¹¹⁷ *Offsetting Expenses with Aircraft Management*, Executive Flyer Magazine, Spring 2003, <http://executiveflyer.com/EFMagazine/Vol2_Issue1/OffsettingExp_Ed.htm>.

¹¹⁸ Peter H. Stone, *K Street Stumble*, National Journal, March 27, 2004, at 958–63.

¹¹⁹ During her interview with Committee staff, former Abramoff associate Stephanie Leger Short testified, “[T]he public line was that the [AIC] was a think tank; the real line was that that’s how Jack did work for Malaysia and Eritrea.” Interview of Stephanie Leger Short, former associate, Greenberg Traurig, in Washington, D.C. (August 18, 2005). Looking back, Leger opined that Abramoff did work for Malaysia and Eritrea through AIC to avoid registering under FARA. *Id.* According to documents and financial records in the Committee’s possession, the Embassy of Malaysia made four payments of \$300,000 each to AIC, on June 29, 2001, October 5, 2001, January 3, 2002, and March 13, 2002. Almost immediately afterwards, AIC made payments to an individual named Khaled Saffuri in the amount of \$90,000, \$45,000, and \$45,000 on October 8, 2001, January 3, 2002, and March 20, 2002 respectively, apparently for “salary/consulting” purposes regarding Malaysia. Soon thereafter, each one of those payments was followed by an additional disbursement of \$100,000, \$210,000, \$245,000, and \$255,000 to Greenberg Traurig on July 5, 2001, October 8, 2001, February 22, 2002, and February 26, 2002, respectively.

Saffuri appears to have been a lobbyist at an Abramoff owned or controlled entity called the Lexington Group. At one time, Saffuri was reportedly the Assistant Executive Director of the American Muslim Council (“AMC”), where he apparently served as a lobbyist. See Greenberg Traurig document production (GTG007370-JA-P) (March 27, 2001). The AMC was apparently founded in 1990 by Abdurahman Mohamed Alamoudi, an open supporter of Palestinian terror organization Hamas. *Id.* A few years ago, Alamoudi was implicated in a plot to assassinate the Saudi Crown Prince Abdullah. See *Department of Justice* (visited October 15, 2004) <http://www.usdoj.gov/opa/pr/2004/October/04_crm_698.htm> (describing Abdurahman Alamoudi’s sentencing in a Terrorism Financing Case).

Scanlon that they used in their kickback scheme, is the putative international think tank, AIC. With two of Scanlon's beach buddies sitting on its board, AIC's purpose was actually to collect fees associated with activities conducted by others and, in some cases, divert those fees to entities owned or controlled by Scanlon or Abramoff. In other words, AIC was a sham. From 2001 through 2003, the Choctaw and the Louisiana Coushatta collectively paid AIC about \$6,308,854. While much of this money went to vendors who actually conducted grassroots activities for the Tribes, such as Ralph Reed, as the Tribes had intended, millions were not used for that purpose.