



"It's time to throw the money-changers out of the temple of higher education."

— Senator Edward M. Kennedy, November 2006

# MONEY-CHANGERS IN THE SENATE

How the Student Loan Industry  
Enlisted Senators  
to Fight Reform  
and Protect Profits

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## Introduction

While Wall Street's campaign to resist meaningful regulatory reform makes headlines, financial industry lobbyists are having a field day on a second front. The student loan industry faces a serious challenge from advocates who question the reason for its existence, which is premised on massive, inefficient government subsidies.

Leading student lender Sallie Mae reported profits of \$324 million last year on the strength of its student loan business, which is heavily subsidized through the Federal Family Education Loan program (FFEL). Sallie Mae originated \$21 billion worth of loans backed by the program in 2009; other major lenders profiting from the program include Citigroup, Nelnet, JPMorgan Chase, and Wells Fargo.

Meanwhile, by ending the program with the Student Aid and Fiscal Responsibility Act (SAFRA), the Congressional Budget Office estimates that the federal government would save \$68 billion—money that would otherwise subsidize these banks' profits. The CBO score also estimates that students would pay significantly lower interest rates on their loans.

With billions in profits on the line, banks have waged an intensive, multimillion-dollar political and lobbying campaign to maintain the status quo: subsidies for the banks, at students' expense.

Their expensive campaign has won them some support. Last week, six Democratic senators sent a letter to Senate Majority Leader Harry Reid urging him to proceed with caution on reform efforts: Blanche Lincoln (D-Ark.), Mark Warner (D-Va.), Tom Carper (D-Del.), Ben Nelson (D-Neb.), Bill Nelson (D-Fla.), and Jim Webb (D-Va.).<sup>1</sup> The letter reads in part:

*We write to make you aware of our concern with provisions of contemplated student lending reform that could put jobs at risk. Increasing our nation's commitment to higher education funding is a priority, but we must proceed toward this objective in a thoughtful manner that considers potential alternative legislative proposals, while still delivering an equivalent amount of savings over the next ten years.*

What would prompt six senators to oppose efforts aimed at reducing lending costs by cutting out superfluous money-changers? The answer, of course, is the power of money, as deployed through a combination of campaign contributions and strategic lobbyist hires.



**Old boss, meet the new boss.**  
Student loan lobbyist Kelly Bingel, left,  
and her former employer, Sen.  
Blanche Lincoln.

This report documents the extensive ties between the six senators and major players in the student loan industry.

Among the findings:

- The report estimates that the student loan industry has spent \$15 million in the past year on a political campaign to rescue multibillion-dollar profits. Banks have waged an expensive and sophisticated battle to defeat SAFRA with campaign contributions, lobbying of congress and the CBO, help from major industry associations, and shadowy front groups to escape accountability.
- At least six former staffers to the six senators who signed the letter to Reid are currently lobbying for the student loan industry: Kelly Bingel (former chief of staff to Blanche Lincoln); Bill Leighty (former chief of staff to Mark Warner); Amy Tejral (former legislative director for Ben Nelson); Oscar Ramirez (gubernatorial campaign staffer for Mark Warner); Timothy Casey (legislative aide to Tom Carper); and Paul Brathwaite (Carper staffer).
- Lenders have employed front groups to lobby on their behalf. The Business Roundtable, the Consumer Bankers Association, the American Bankers Association, and the Chamber of Commerce (including CEO Tom Donohue) have all lobbied around student aid reform on behalf of unidentified lenders. Major lenders associated with these groups include JPMorgan Chase, Citigroup, Wells Fargo, Sallie Mae, and Bank of America.
- Student lenders and their lobbyists have showered the six senators with tens of thousands in campaign contributions over the last year, including \$15,000 from the PACs of Sallie Mae and Nelnet alone. In the past, the senators have also been top recipients of loan industry largess: Sallie Mae and Nelnet both maxed out to Bill Nelson in the space of three days during his 2006 campaign; two of Tom Carper's three top career contributors are JPMorgan Chase and Citigroup, both major players in the student loan industry; Ben Nelson has received \$19,000 from Nelnet's PAC in the past ten years.
- Jim Webb, Carper, and Ben Nelson sided with banks, against students, on a key education measure in 2007. Nelson also sponsored a failed 2007 amendment that would have maintained government subsidies to private student lenders.

The report documents a host of additional ties between the six senatorial defenders of the status quo and the main organs of the student loan industry.

Given that deeply indebted students and young adults have little discretionary income to devote to catered dinners for senators and campaign coffers, we can only hope that transparency and accountability will balance the scales.

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## Background: Billions in Bank Profits on the Line

Student loan reform represents a multibillion dollar hit to Wall Street profits, and major lenders are fighting hard to preserve the status quo: multimillion-dollar salaries for executives, private golf courses, and company jets.

- The largest student lender, Sallie Mae, **originated nearly \$21 billion worth of government-backed loans** through the Federal Family Education Loan program (FFEL) in 2009, and **profits surged to \$324 million**, up from a loss of \$213 million one year ago, largely on the strength of these originations.<sup>2</sup>
- At a recent conference with investors, **Sallie Mae executives saw the elimination of FFEL as a \$194 million hurdle to overcome.**<sup>3</sup> Executives said that they had taken to calling the Obama administration plan four-letter words. The FFEL portfolio also generates around \$1 billion a year in cash flow, and is tightly integrated with the company's servicing operation.
- **Nelnet, another major lender, reported 2009 profits of \$139 million in 2009**, up from \$28.6 million in 2008.<sup>4</sup> The company has reported profits of over \$200 million since 2007, when the student loan industry was last threatened with substantial reforms. Citigroup, another major lender, originated over \$5 billion in FFEL loans, as did Wachovia Education Finance (now a subsidiary of Wells Fargo).
- In May 2008, **the student lenders were bailed out by the Ensuring Continued Access to Student Loans Act (ECASLA)**, which gave the banks further federal subsidies. The bill allowed lenders like Sallie Mae to sell loans back to the Department of Education through a number of loan-purchase programs.<sup>5</sup>
- Meanwhile, the Congressional Budget Office estimates that a transition to direct lending would save the federal government **\$68 billion over the next ten years.**<sup>6</sup> The CBO score also notes that students pay higher interest rates on loans originated through FFEL.
- The \$68 billion savings will otherwise subsidize private lenders like Sallie Mae to pay their executives exorbitant salaries and bonuses. **Sallie Mae chairman Albert Lord has reaped more than \$225 million from the student loan business** over the course of his career.<sup>7</sup> In 2008, even as profits declined, Lord received \$4.7 million in total compensation. He has used a portion of the proceeds to build himself a private golf course.<sup>8</sup>

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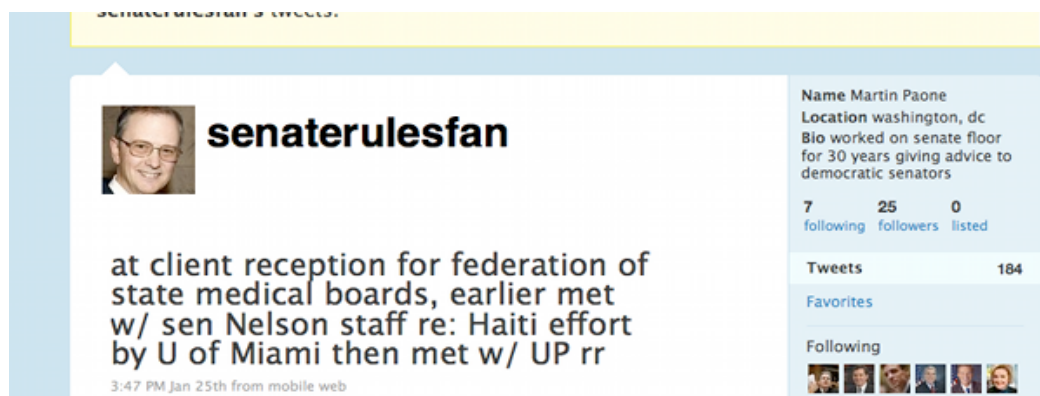
## A Multi-Pronged Strategy to Fight Reform and Protect Profits

In order to protect their exorbitant profits and executive salaries, the student loan industry, led by Sallie Mae, has waged an intensive, multimillion-dollar political campaign against reform. The industry first ramped up its political spending in 2007, when the Democrats regained the majority in Congress and Senator Edward Kennedy initiated a fight to reform student lending.

Since then the industry has hired a number of powerful Democratic insiders to push its agenda in Congress and with the Obama administration, and devised a sophisticated political strategy that

targets a number of key leverage points. In recent months, the industry has focused on finding enough Democratic senators to keep the bill from going forward as part of reconciliation (which only requires 50 votes).

- **Banks have spent an estimated \$15 million fighting student aid reform.** The estimate is extrapolated from lobbying filings, campaign finance reports and relative market share for three FFEL participants: Sallie Mae, Nelnet, ALL Student loan. Some banks lobby around much more than student loan reform, and other lenders lobby through industry associations, so the total was estimated based on banks that do report exact lobbying figures.<sup>9</sup>
- **Top student lenders Sallie Mae and Nelnet spent over \$4 million combined lobbying last year, and over \$12 million since 2007.**<sup>10</sup> The companies hired top insiders at the Podesta Group, Wilmer Hale, Avenue Solutions, and other lobbying firms with close ties to key senators and Obama administration officials. Other industry players, such as Citigroup, are also lobbying around the legislation, but since they are also lobbying around other issues it is more difficult to quantify their expenditures.
- **Sallie Mae has targeted the Congressional Budget Office in its efforts to shape student loan reform.** According to lobbying filings, Sallie Mae has lobbied the non-partisan Congressional Budget Office, a key player in the student loan reform fight.<sup>11</sup> The CBO's recent score lowered estimates of the cost savings associated with student lending because so many schools had already switched to direct lending in anticipating the end of FFEL. Lobbyists used the report to enlist senators concerned about cost savings.
- **Bank lobbyists have worked to ensure that Senate rules work in their favor.** A key objective appears to have been keeping SAFRA out of reconciliation, where the bill would only need 50 votes in the Senate. One Sallie Mae lobbyist, Martin Paone, is a Senate rules expert, having once served as the Democratic Secretary of the Senate under Senator Harry Reid. His twitter handle: @senaterulesfan.<sup>12</sup>



- **Significant lobbying and political activity is being executed by a number of affiliated industry groups.** The Business Roundtable, the Consumer Bankers Association, the American Bankers Association, and the Chamber of Commerce are all lobbying around student loan reform on behalf of their members.<sup>13</sup> Chamber of Commerce CEO Tom Donohue has personally lobbied around the bill.<sup>14</sup>

- **Student lenders have created shadowy industry associations to push their agenda.** One group, the Student Loan Coalition, was hired by John Dean, a lobbyist for the Consumer Bankers Association, who then contracted a number of lobbyists at Mehlman, Vogel, Castagnetti who have primarily lobbied around healthcare legislation. At least one lobbying firm, the Glover Park Group, has been lobbying on behalf of an undisclosed client.<sup>15</sup>
- **Bank lobbyists are enlisting friends in Congress to propagate myths about job loss resulting from the bill.** One Congressman, Rep. Buck McKeon, parroted the words of his longtime donor John Dean, a longtime education lobbyist for the Consumer Bankers Association:

Dean says if it passes, private lenders would have to cut 35,000 jobs, the nation's long-term debt would go up and borrowers would have fewer choices.<sup>16</sup>

Rep. Howard P. "Buck" McKeon (R-Calif.) said the proposal would eliminate 30,000 loan industry jobs. "It boggles my mind," McKeon said.<sup>17</sup>

Dean has donated over \$8000 to McKeon. A recent Nation article showed that estimates of job loss are vastly overstated.<sup>18</sup>

- **Sallie Mae and Nelnet have spent nearly \$5 million in PAC contributions over the past ten years, and have already spent over \$400,000 in the 2010 cycle.** Sallie Mae's PAC has spent \$331,820 in the 2010 cycle, and \$991,992 in the 2008 cycle.<sup>19</sup> Nelnet's has spent \$25,500 in the current cycle, and spent \$431,000 in the 2006 cycle.<sup>20</sup>

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## Bank Lobbyists Have Close Ties to Six Senators Who Wrote to Reid

The six Democratic senators who signed the letter to Reid -- Carper, Lincoln, Warner, Webb, Ben Nelson, and Bill Nelson -- have especially close ties to the lobbyists enlisted by student lenders to fight reform. At least six of the student loan industry lobbyists used to work for one of the senators in some capacity.<sup>21</sup> Who works for who now?



*Nelnet lobbyist Amy Tejral and her old boss, Senator Ben Nelson.*

- **Ben Nelson's former legislative director, Amy Tejral, lobbies for Nelnet, a major student lender based in Nebraska.**<sup>22</sup> Tejral joined Avenue Solutions, a small Washington lobbying firm, in 2007, the same year that Nelnet hired Avenue to begin lobbying around student lending issues. Avenue has taken in \$300,000 from Nelnet over the three years since Tejral joined the firm. Elizabeth Barnett, Lincoln's former health policy adviser, is also one of the three partners at Avenue Solutions.
- **Blanche Lincoln's former chief of staff, Kelly Bingel, is currently lobbying for the student loan industry.**<sup>23</sup> Bingel works for Mehlman, Vogel, Castagnetti, a firm which has played a key role in the healthcare reform fight. Lincoln and Bingel were members of the same sorority, Chi Omega. Bingel on meeting Lincoln: "The first thing she said when she saw my resume was, 'Oh, she's a Chi Omega!'"<sup>24</sup>

Many of the Mehlman lobbyists have been working for healthcare interests over the past year, including former aides to Max Baucus, Rahm Emanuel, and Bill Frist. During the second quarter of 2009, they were enlisted by John Dean, a lobbyist for the Consumer Bankers Association, to lobby on behalf of the "Student Loan Coalition." It is unclear who is behind the Student Loan Coalition.



*Sallie Mae lobbyist Bill Leighty and his old boss, Senator Mark Warner.*

- **Sallie Mae lobbyist Bill Leighty was Mark Warner's "right arm" during his first term as governor of Virginia.** Leighty was Warner's chief of staff during his term as governor, from 2002 to 2007. In 2007, upon leaving Tim Kaine's administration, he registered with the state of Virginia as a Sallie Mae lobbyist.
- **Lottie Shackelford, one of Lincoln's major donors, is a Sallie Mae lobbyist.**<sup>25</sup> Shackelford, the former mayor of Little Rock and vice chair of the Democratic National Committee, has given Lincoln \$3750 over the past five years, including \$2000 in 2009. She first began lobbying for Sallie Mae in 2007. In December, Lincoln's office issued a press release in which Shackelford thanked Lincoln for her efforts to pass healthcare reform:

"Arkansas's families and businesses would benefit tremendously under the Senate's plan for health reform by having access to quality and affordable health care," said Lottie Shackelford, a widely respected leader in Arkansas and former mayor of Little Rock. "We need the reforms this bill brings. This would not be possible without Senator Lincoln's efforts, and I thank her for her commitment to moving our state forward." The press release did not identify Shackelford as a lobbyist.<sup>26</sup>

- **Top Warner donor Susan Brophy works at the Glover Park Group, which has been lobbying against student loan reform.** Brophy has donated \$5,300 to Warner and his PAC, and has close ties to the Senator through her husband, Gerald McGowan. According to the *New York Times*, the Glover Park Group has been lobbying against student loan reform on behalf of an undisclosed client. In recent years, Glover has represented the American Banking Association.

McGowan, Brophy's husband, is the treasurer of Warner's PAC, Forward Together. McGowan also co-chaired a fundraiser for Warner during his 2008 campaign for senator. McGowan has given \$16,600 to Warner over the course of his career, including \$4,600 during his 2008 Senate campaign and \$2,000 during his first run for the Senate, in 1995. Brophy gave \$3,300 during his 2008 campaign.

- **Sallie Mae lobbyist Oscar Ramirez worked for Warner's gubernatorial campaign in 2001, and worked for Warner's PAC in 2006.** Ramirez joined the Podesta Group in 2009 from the Department of Labor, where he was a top aide to Secretary of Labor Hilda Solis.<sup>27</sup>
- **Timothy Casey, a legislative aide to Tom Carper from 2005 to 2007, is now lobbying for the Apollo Group.**<sup>28</sup> The Apollo Group owns the University of Phoenix, which has partnered with Sallie Mae on student loan deals. In its most recent 10-K, the Apollo Group lists SAFRA and an end to the Federal Family Education Loan Program as a possible risk to future revenues.
- **Tom Carper's longtime former chief of staff, Jonathon Jones, is a Wall Street lobbyist.** Jones, Carper's chief of staff from 2001 to 2006, has lobbied against financial reform and consumer financial protections for a range of clients, including the Business Roundtable, which is also fighting student loan reform. Jones is a partner in the lobbying firm Peck, Madigan, which has also lobbied against financial reform for the Chamber of Commerce.<sup>29</sup>
- **Paul Brathwaite, a former Carper staffer, is a Sallie Mae lobbyist.** Brathwaite joined the Podesta Group after serving as executive director of the Congressional Black Caucus.<sup>30</sup>
- **Mark Warner's current chief of staff, Luke Albee, was a Fannie Mae lobbyist until 2008.** Not Sallie Mae, but another financial industry behemoth that enjoys the backing of the federal government. After leaving Senator Pat Leahy's office in 2005, Albee went to work for Ricchetti, Inc, where he lobbied on behalf of Fannie Mae and a number of other clients.<sup>31</sup>

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## Six Senators Were Top Recipients of Student Loan Industry Cash

Major student loan industry players haven't just greased the palms of the six senators' former staffers; they've also made extensive campaign contributions to the six senators themselves. Sallie Mae, Nelnet, Citigroup, and JPMorgan Chase have made tens of thousands of dollars of PAC contributions to the six senators over the course of their careers; their executives and lobbyists have made tens of thousands of dollars in additional contributions.

- **Ben Nelson is a top recipient of contributions from student lender Nelnet.** The company's PAC has given him \$19,000 over the course of his career, and \$4,000 in 2009 alone.<sup>32</sup>
- **Sallie Mae's PAC maxed out to Blanche Lincoln's primary campaign account in 2009,** and donated \$4000 in December 2009 alone. Previously, she had received \$2000 from the lender.
- **The three partners of Avenue Solutions donated \$10,300 to Lincoln in 2009.** Avenue is the only lobbying firm currently employed by student lender Nelnet. Elizabeth Barnett, formerly Lincoln's health policy adviser, is a principal at Avenue Solutions.
- **At least two Sallie Mae lobbyists, Tony Podesta and Niles Godes, have given to five of the six senators.** Godes has given \$10,400, to all but Mark Warner, and Podesta has given a total of \$5500, to all but Jim Webb.
- **Sallie Mae's PAC maxed out to Warner during his 2008 Senate campaign.** The PAC made contributions totaling \$10,000, maxing out to both his primary and general account.
- **Nelnet and Sallie Mae both maxed out to Bill Nelson's general campaign account in 2006.** Nelson received \$10,000 within three days from the two companies' PACs, in late September 2006.
- **Nelnet is also a top contributor to Mark Warner.** The company gave \$7500 to his 2008 Senate campaign.
- **Sallie Mae's PAC is a top contributor to Tom Carper.** Carper has received \$13,500 from Sallie Mae's PAC over the course of his career, including \$3,500 in 2009 alone.
- **JPMorgan Chase and Citigroup -- both major players in student lending -- are two of Carper's three top career contributors.**<sup>33</sup> Between individual and PAC contributions, Citigroup has given Carper over \$80,000 over the course of his career, and JPMorgan Chase has given over \$70,000. Only MBNA, which was acquired by Bank of America in 2005, has given more.

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## In Past Votes, Senators Sided With Banks, Against Students

Banks and student loan companies have fought to maintain the status quo for years. In the past, several of the six senators have consistently staked out positions that favored banks over students. In 2007, Senator Edward Kennedy introduced a Senate budget reconciliation bill that sought to cut \$18 billion in lender subsidies and increase student access to loans. The vote tallies

on two key amendments reveal where the sympathies of several of the six senators lie, including Jim Webb, Tom Carper, and Bill Nelson.

- **In 2007, Ben Nelson introduced an amendment to maintain subsidies to student lenders like Nelnet and Sallie Mae.**<sup>34</sup> The amendment, S 2337, sought to restore the nearly \$20 billion in private lender subsidies that Kennedy sought to cut. It failed 35-62. Nelson was the only Democrat to vote yes, and 12 Republicans joined the Democrats in voting no.
- **In 2007, Jim Webb, Ben Nelson, and Tom Carper voted against a direct lending program that would have expanded student aid access -- and cut into bank profits.**<sup>35</sup> Senator Sherrod Brown introduced the amendment after receiving a letter from a constituent with crushing student loan debt. It would have created a supplemental loan program that would have allowed students to bypass private lenders. Nelson, Carper, and Webb were three of the eight Democrats who joined with the Republicans to defeat the amendment.

## Notes

- <sup>1</sup> <http://www.nytimes.com/2010/03/11/us/politics/11loans.html?src=me>
- <sup>2</sup> Sallie Mae 2009 10-k, <http://www.sec.gov/Archives/edgar/data/1032033/000095012310018176/w76911e10vk.htm>
- <sup>3</sup> [http://studentlendinganalytics.typepad.com/student\\_lending\\_analytics/2010/03/insights-from-sallie-mae-investor-meeting-may-become-bank-holding-company-2010-private-loan-goals-no.html#more](http://studentlendinganalytics.typepad.com/student_lending_analytics/2010/03/insights-from-sallie-mae-investor-meeting-may-become-bank-holding-company-2010-private-loan-goals-no.html#more)
- <sup>4</sup> Nelnet 2009 10-k, [http://sec.gov/Archives/edgar/data/1258602/000143774910000526/nelnet\\_10k-123109.htm](http://sec.gov/Archives/edgar/data/1258602/000143774910000526/nelnet_10k-123109.htm)
- <sup>5</sup> <http://firedoglake.com/student-lenders-and-the-ecasla-bailout/>
- <sup>6</sup> [http://www.cbo.gov/ftpdocs/113xx/doc11343/03-15-Student\\_Loan\\_Letter.pdf](http://www.cbo.gov/ftpdocs/113xx/doc11343/03-15-Student_Loan_Letter.pdf)
- <sup>7</sup> <http://www.washingtonpost.com/wp-dyn/content/article/2008/01/10/AR2008011003785.html>
- <sup>8</sup> <http://www.washingtonpost.com/wp-dyn/content/article/2006/01/26/AR2006012602162.html>
- <sup>9</sup> All lobbying data is drawn from OpenSecrets.org. To see all organizations lobbying around SAFRA, go here: <http://www.opensecrets.org/lobby/billsum.php?id=109568&lname=H.R.3221>
- <sup>10</sup> Figures derived from lobbying data on OpenSecrets.org.
- <sup>11</sup> <http://soprweb.senate.gov/index.cfm?event=getFilingDetails&filingID=269E4D73-49E4-4B89-93CA-7B367D3A6C07>
- <sup>12</sup> <http://74.125.47.132/search?q=cache:XpqLhTw1n80J:https://twitter.com/senaterulesfan>
- <sup>13</sup> <http://www.opensecrets.org/lobby/billsum.php?id=109568&lname=H.R.3221>
- <sup>14</sup> <http://soprweb.senate.gov/index.cfm?event=getFilingDetails&filingID=BBEEEDF7-14EC-47DE-91FA-07380D2BB851>
- <sup>15</sup> <http://thecaucus.blogs.nytimes.com/2010/03/12/student-loan-bill-opposed-by-group-packed-with-ex-clinton-aides/>
- <sup>16</sup> <http://www.wbur.org/npr/124731280>
- <sup>17</sup> <http://www.washingtonpost.com/wp-dyn/content/article/2010/03/16/AR2010031603763.html?hpid=sec-education>
- <sup>18</sup> [http://www.thenation.com/doc/20091221/de\\_la\\_torre](http://www.thenation.com/doc/20091221/de_la_torre)
- <sup>19</sup> <http://www.opensecrets.org/pacs/lookup2.php?strID=C00331835&cycle=2008>
- <sup>20</sup> <http://www.opensecrets.org/pacs/lookup2.php?strID=C00370015&cycle=2006>
- <sup>21</sup> Employment data was drawn from OpenSecrets.org (revolving door database), [legistorm.com](http://legistorm.com), and [LittleSis.org](http://LittleSis.org).
- <sup>22</sup> <http://soprweb.senate.gov/index.cfm?event=getFilingDetails&filingID=8DB86F3F-20B3-4CE4-8DCE-B53A261597C3>
- <sup>23</sup> [http://www.opensecrets.org/revolving/rev\\_summary.php?id=35121](http://www.opensecrets.org/revolving/rev_summary.php?id=35121)
- <sup>24</sup> <http://c.chiomega.com/content.aspx?topic=13&type=context&id=14>
- <sup>25</sup> <http://soprweb.senate.gov/index.cfm?event=getFilingDetails&filingID=308FD2A5-8D36-4AA5-AEC4-237E53373FFC>
- <sup>26</sup> <http://lincoln.senate.gov/newsroom/2009-12-22-2.cfm>
- <sup>27</sup> <http://www.linkedin.com/pub/oscar-ramirez/6/1b8/a3a>
- <sup>28</sup> [http://www.legistorm.com/person/Timothy\\_J\\_Casey/21169.html](http://www.legistorm.com/person/Timothy_J_Casey/21169.html)
- <sup>29</sup> <http://soprweb.senate.gov/index.cfm?event=getFilingDetails&filingID=009F5F3A-B194-42EB-98DA-1864B9DEA1D8>
- <sup>30</sup> <http://www.opensecrets.org/lobby/lobbyist.php?lname=Jones%2C+Jonathon&id=Y00000200810&year=2009>
- <sup>31</sup> [http://www.opensecrets.org/revolving/rev\\_summary.php?id=70143](http://www.opensecrets.org/revolving/rev_summary.php?id=70143)
- <sup>32</sup> <http://www.opensecrets.org/lobby/lobbyist.php?lname=Albee%2C%20Luke&id=Y00000405880&year=2008>
- <sup>33</sup> All campaign finance data is drawn from OpenSecrets, <http://opensecrets.org>.
- <sup>34</sup> <http://www.opensecrets.org/politicians/contrib.php?cycle=Career&cid=N00012508&type=l>
- <sup>35</sup> <http://www.govtrack.us/congress/amendment.xpd?session=110&amdt=s2337>
- <sup>36</sup> <http://www.govtrack.us/congress/amendment.xpd?session=110&amdt=s2376>



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