

Fowler asserts that his conduct was circumscribed not by these guidelines, but by prohibitions on criminal *quid pro quos*, as well as by his own ethical view that it was inappropriate to link discussion of contributions with discussion of substantive matters of interest to the donor, or to take action for a donor on the basis of a contribution. Yet, evidence suggests that Fowler and his staff engaged in fund-raising discussions with contributors for whom they then interceded with the Administration about various other matters.

**2) Evidence of DNC Conduct in Other Matters
Involving Both Contributions and Issues
Pending Before the Administration**

Fowler insists that he was motivated to meet with the O'Connor group on April 28, 1995, simply because O'Connor was a friend who had just hosted a luncheon for Fowler six weeks earlier, and not because of a fund-raising agenda.²⁶⁵ Yet, evidence suggests that Fowler dealt with DNC constituents or their representatives on other occasions where the anticipated agenda included both discussion of contributions and specific matters pending before the Administration. With regard to Patrick O'Connor in particular, documents and other evidence demonstrate that O'Connor repeatedly approached Fowler in just such situations following the Hudson application process.

Fowler can recall only two meetings during Fowler's tenure as DNC Chairman when O'Connor brought clients of his to meet with Fowler. The first was the April 28 Hudson opponents' group meeting, which was preceded by Fowler's March 15 meeting with O'Connor

²⁶⁵O'Connor insists that he and Fowler were mere acquaintances prior to the March 5, 1995, brunch, and that his appeal to Fowler on the Hudson matter was not born out of friendship – even though other witnesses, including O'Connor's own partner, understood that the two men were close friends.