

In sum, the evidence obtained and evaluated by this Office does not prove that the contributions made by tribal opponents and their representatives after the Hudson decision were part of a *quid pro quo* arrangement, or any other contingency agreement. Furthermore, there is considerable evidence that a variety of facts and motivations led to the decisions to donate funds, which a number of individuals and entities made over the course of several months. This is not to say that the evidence rules out the Hudson decision as a factor in these contribution decisions; rather, the evidence fails to prove that these donations were payments pursuant to a *quid pro quo* obligation, and suggests that multiple legitimate factors led to the donations.

The following discussion sets forth the high points and a representative sampling of these factual findings. We have attempted neither to recount here all of the reviewed evidence, nor to draw every reasonable inference or conclusion that could be derived from it. Some detail is provided, however, to frame the context for how extensively national Democratic organizations and campaigns courted Indian political contributions during the relevant time frame.⁵¹⁸

1. 1995 Contribution Activity Prior to the Hudson Decision

O'Connor and Kitto solicited their tribal clients for political contributions before Interior released its July 14 decision in the Hudson matter. The first such recorded effort by either lobbyist is Kitto's May 12, 1995, memo to tribal leaders concerning the joint Democratic Congressional Dinner, scheduled for May 23. As noted above, Kitto presented the event as a chance to meet with members of Congress, *see supra* at 122, and several of the Hudson opponent

⁵¹⁸Because of its limited probative value to the question of a possible *quid pro quo*, our analysis considered few facts relating to Republican Party solicitations and contributions within the Indian community. This is not to say such solicitations and contributions did not occur or were not reviewed, but they are not discussed in this report.