

Daniel Guarnera
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Professor James Thurber
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Stranger in a Strange Land: The Ethics of Lobbying for Foreign Interests

“During the presidency of Ronald Reagan, no major law firm or lobbying organization would have represented the Soviet Union if it had tried to take over an American oil company.”
--Representative Frank Wolf (R-Va.)¹

Despite the rapid growth of the lobbying industry, the world of Washington is still often described as insular—there are familiar interests, familiar players, and familiar patterns. Over the past twenty years, however, there has been a slow but steady influx of new faces in Washington lobbying: foreign companies and foreign states. Representing a foreign client can bring with it unique substantive challenges; for example, it can be politically damaging if foreign interests appear to be promoted at the expense of American interests. But lobbying for foreign clients also raises new ethical challenges. Many of the ethical questions that arise from representing foreign clients can be seen in the case of the Chinese energy giant CNOOC’s attempted takeover of American oil company Unocal in the summer of 2005. Since all indicators point to increased lobbying by foreign entities—both public and private—in the future, the ethical lessons of the Unocal case are highly relevant for developing an ethical code that applies to the distinctive elements of foreign lobbying.

The increasing lobbying effort by foreign firms and governments corresponds to the current wave of globalization. As barriers to international trade and investment fall rapidly, the costs of expanding business operations in foreign countries are dramatically reduced. Foreign tax law, trade policy, and labor regulations have an increased impact on U.S. firms, and U.S. policy in all those areas similarly affects foreign businesses. This globalized commercial environment has led to a baffling array of business arrangements—joint ventures, subsidiaries, international mergers, etc. Whereas some companies are still closely associated

¹ Qtd. in Tiron, Roxana. “Wolf Grows at Lobbying for CNOOC”. *The Hill*. 14 July 2005. Available at <http://www.thehill.com/thehill/export/TheHill/News/Frontpage/071405/wolf.html>.

with the country in which they are headquartered (Sweden's Ikea, Japan's Honda, France's l'Oréal, etc.), most consumers are ignorant to the ownership structures of many popular brands (Stop & Shop and Giant Food are Dutch-owned, Firestone tires are Japanese, Miller beer is South African, etc.). "No one cares where the CEO sits," says Todd M. Malan, President & CEO of the Organization for International Investment (OFII), which represents U.S. subsidiaries of countries headquartered abroad.² Malan asks, "If Siemens [based in Germany] is going to make gas turbines in upper New York, and GE is going to build them in Italy, which is really more American?" In other words, the globally integrated structure of today's economy means that "foreignness" is often more an issue of perception than one of either legality or reality.

As foreign interests in American policy have increased, so have foreign investments in lobbying. In 2003, foreign companies spent about \$109 million on lobbying.³ This represents a 38 percent increase over 2000. Foreigners' political action committees (PACs) contributed \$9 million in the 2004 election cycle, almost 20 percent more than 2000.⁴ In addition to lobbying by foreign businesses, foreign governments spent over \$26 million on lobbying in 2004 (by comparison, organized labor's total lobbying efforts for that year were roughly equivalent).⁵

Much of this lobbying money has gone through trade associations. The largest such trade association is the Organization for International Investment (OFII), discussed earlier, which describes itself as a Chamber of Commerce for U.S. subsidiaries. OFII was founded in the early 1980s with seven members; it grew to 47 in 1995, 66 by 2000, and now has 140 corporate members from all over the world (including giants like GlaxoSmithKline, Shell Oil, and Tyco Intl.). "If you don't participate in Washington you get steamrolled," says OFII

² Malan, Todd. Personal Interview. 17 Oct. 2006.

³ Barshay, Jill. "The New Kids on K Street". *CQ*. 11 July 2005. p. 1890.

⁴ *Ibid.*

⁵ Katel, Peter. "Lobbying Boom". *CQ Researcher*. 22 July 2005. Vol. 15, Num. 26.

President & CEO Todd Malan, who coined the term “insourcing” to refer to the influx of jobs brought by foreign investment in the U.S.⁶ He notes that there are some substantive differences lobbyists must face when representing foreign clients. Some of OFII’s clients find PACs distasteful, for example, and are hesitant to let U.S.-based workers contribute. “Americans have conceptually accepted the idea that you should do something to politically advantage your employers,” says Malan. “That’s weird to a European ear. We explain that it’s no less than their peers are doing.”⁷ Clients sometimes risk media backlash in their home countries because of their contributions. He also notes that the growing Washington presence of non-traditional investor countries from the developing world may require more culturally sensitive communication between clients and lobbyists.

In addition to trade associations, many foreign companies have retained the services of private lobbying firms. For example, Sweden’s Securitas (the largest private security firm in the U.S.) made headlines when it contracted with the firm Venable after its airport screening personnel were failed to avert the 9/11 hijackings.⁸ This new wave of private lobbying is not limited to Western companies. For example, in the first half of 2005 there were at least 17 private lobbying contracts between Chinese companies and U.S. firms.⁹

As a reflection of the potentially altered ethical landscape of foreign lobbying, there is a separate law regulating foreign lobbyists. The Foreign Agents Registration Act (FARA) monitors regulation of political activities conducted in the United States on behalf of foreign businesses and nations. FARA was originally created to force public disclosure of Nazi propaganda efforts in the U.S. in the 1930s, but its current incarnation (amended in 1996) applies to any “agent of a foreign principal” that attempts to influence Congress, the federal

⁶ Qtd. in Barshay, Jill. “The New Kids on K Street”. *CQ*. 11 July 2005. p. 1890.

⁷ Malan, Todd. Personal Interview. 17 Oct. 2006.

⁸ *Ibid.*

⁹ “Report of the Attorney General on the Administration of the Foreign Agents Registration Act”. U.S. Department of Justice. 30 June 2005. p. 41-44. Available at <http://www.usdoj.gov/criminal/fara/SemiAnnualReportsToCongress2004-2007/1sthalf2005FARAREporttoCongress.pdf>.

bureaucracy, or American public opinion.¹⁰ An “agent,” according to FARA, is an entity who acts “directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign principal.”¹¹ Lobbyists whose activities qualify under FARA must register with the Department of Justice and submit semi-annual financial information.

There are exemptions to FARA registration, including lawyers representing foreign clients in the courts, diplomats recognized by the State Department, and people whose work is neither political nor commercial (i.e. exclusively academic, charitable, or religious). The most important exemption, however, was added to the Lobbying Disclosure Act in 1998. Reflecting the increases in foreign lobbying, the LDA held that lobbyists registered as domestic lobbyists under the LDA did not need to register separately under FARA. This exception does not apply to lobbyists representing foreign governments or political parties.¹²

The history of foreign lobbying in the U.S. proves that foreign lobbying is by no means insulated against the kinds of unethical behavior which can plague domestic lobbying. In one of best-known ethical scandals of the past forty years—sometimes referred to as “Koreagate”—the Washington-based South Korean national Tongsun Park illegally lobbied Congress for policies favorable to South Korea.¹³ With the help of Rep. Richard Hanna (D-Ca.), Park used his position as exclusive agent for rice sales to his nation to collect large commissions from U.S. rice exports and used some of the profits to give donations to campaigns. The Justice Department indicted him in 1977 for failure to register as a foreign agent and campaign finance violations. Park fled the country but returned after he was granted immunity to implicate his accomplices before Congress. Ultimately, Rep. Hanna agreed to a plea bargain and was sentenced to two-and-a-half years in prison. Two other

¹⁰ Woodstock Theological Center. Washington: Georgetown University Press, 2002.

¹¹ *Ibid.*

¹² “Report of the Attorney General on the Administration of the Foreign Agents Registration Act”. U.S. Department of Justice. 30 June 2005. p. 41-44. Available at <http://www.usdoj.gov/criminal/fara/SemiAnnualReportsToCongress2004-2007/1sthalf2005FARAREporttoCongress.pdf>.

¹³ Katel, Peter. “Lobbying Boom”. *CQ Researcher*. 22 July 2005. Vol. 15, Num. 26.

former congressmen were found to have received illegal contributions up to \$407,000, and twenty-five members had received lesser gifts.¹⁴

Park and Hanna's abuse of their positions and illegal handling of contributions clearly violate even the most minimal legal and ethical standards of lobbying. As the Unocal example demonstrates, however, foreign lobbying can expose far murkier ethical ground. The following case study explores this under-addressed area of lobbying ethics. The case brings to light three particularly important ethical questions, each of which is discussed below.

The Chinese National Offshore Oil Company (CNOOC) was a private energy company in which the Chinese government held a 70% share.¹⁵ Anxious to secure the oil reserves needed to fuel China's rapid industrialization, on June 22, 2005 CNOOC initiated the procedures for a hostile takeover of the medium-sized California-based energy company Unocal. Unocal's board of directors had been in discussions with American energy giant Chevron about a buyout, but CNOOC's offer of \$18.5 billion was \$1.5 - 2 billion higher than Chevron's bid.¹⁶

It appears that CNOOC expected at least some degree of negative reaction in Washington. On the same day as the buyout offer, CNOOC e-mailed members of Congress defending the bid and referring any future questions to CNOOC's legislative representative, the law firm Akin, Gump, Strauss, Hauer & Feld, LLP. Akin Gump, which employs over 900 professional staff, collected \$27 million for its lobbying efforts in 2005, ranking it third among all lobbying firms.¹⁷ Its high-profile advisors included former Clinton aid Vernon Jordan, former HHS Secretary Tommy Thompson, Carter advisor Robert Strauss, and former

¹⁴ Katel, Peter. "Lobbying Boom". *CQ Researcher*. 22 July 2005. Vol. 15, Num. 26.

¹⁵ "Criticism Widespread for China Unocal Deal". Fox News. 13 July 2005. Available at www.foxnews.com/story/0,2933,162338,00.html.

¹⁶ Lohr, Steve. "Unocal Bid Denounced at Hearing". *New York Times*. 14 July 2005. Available at <http://www.nytimes.com/2005/07/14/business/worldbusiness/14unocal.html?ex=1278993600&en=e921ac6f7fa7e5f0&ei=5090&partner=rssuserland&emc=rss>.

¹⁷ "Money in Politics Databases." PoliticalMoneyLine. 13 July 2005. Qtd. in Katel, Peter. "Lobbying Boom". *CQ Researcher*. 22 July 2005. Vol. 15, Num. 26.

U.S. Rep. Bill Paxon (R-N.Y.).¹⁸ The firm has a long history of international involvement and maintains five international offices.¹⁹

CNOOC became introduced to Akin Gump through senior partner James C. Langdon, Jr. The *Washington Post* reports that Langdon met with CNOOC executives in February 2005 through a long-time friend, Goldman-Sachs Vice President William Wicker.²⁰ Ultimately, CNOOC paid Akins Gump \$260,000 in 2005 for its lobbying efforts.²¹ (CNOOC also contracted several other firms including BKSH & Associates, the Brunswick Group, and, most notably, the Republican public relations firm Public Strategies, Inc.)

Langdon's recruitment by CNOOC raises the first ethical quandary. Since 2001, he had been a member of the President's Foreign Intelligence Advisory Board (PFIAB). In February 2005, he was appointed PFIAB Chairman. The PFIAB was created in 1956 to provide independent, civilian analysis of the effectiveness of U.S. intelligence efforts (past chairmen include Brent Scowcroft and former Rep. Thomas Foley [D-Wa.]). As a member of the PFIAB, Langdon had the highest possible security clearance and was responsible for intelligence briefings so secret that most members of Congress could not read them. It was possible that the PFIAB would be asked to provide a national security analysis of the buyout. Langdon's involvement quickly drew criticism. "One has to wonder whether Mr. Langdon's involvement in Chinese affairs will be tolerated by intelligence agencies that have different interests than those of Mr. Langdon's firm," said Steven Aftergood, director of the Federation of American Scientists' Project on Government Secrecy.²²

Langdon recused himself from any further involvement with CNOOC or Unocal through both the firm and the PFIAB. But was the recusal enough to quell any question of

¹⁸ Full biographies can be found by searching at <http://www.akingump.com/attorney.cfm>.

¹⁹ "Akin Gump Firm Brochure". Available at http://www.akingump.com/docs/pdf/firm_brochure.pdf.

²⁰ Weisman, Jonathan. "Bush Advisor Helped Law Firm Land Job Lobbying for CNOOC". *Washington Post*. 12 July 2005. p. D01.

²¹ "China National Offshore Oil Corp. Client Summary, 2005". Lobbying Database. Center for Responsive Politics. <http://www.opensecrets.org/lobbyists/clientsum.asp?txtname=China+National+Offshore+Oil+Corporation&year=2005>

²² Weisman, Jonathan. "Bush Advisor Helped Law Firm Land Job Lobbying for CNOOC". *Washington Post*. 12 July 2005. p. D01.

impropriety? It is important to note that the potential favoritism that Langdon might show CNOOC in his capacity as PFIAB chairman has no immediate corollary in domestic lobbying; the national security of the United States was at stake. Langdon's situation was complicated by the fact that PFIAB chairman is a civilian position, not a full time job. Thus how broad must the wall of propriety around him be? How many countries should he avoid business dealings with because they might potentially come under scrutiny by the PFIAB?

Careful consideration of these questions leads to the conclusion that Langdon should have avoided any business dealings with China that could possibly relate to national security. Given his direct responsibility for providing unbiased intelligence analysis, Langdon should have avoided any question of impropriety. After the war on terror and North Korea, China is probably America's third most important security threat. Civilian post or not, the responsibility of guarding the nation's security interests should outweigh any business involvement. While there may be some countries where the national security threat is minor enough to permit some personal business relations, China is not a marginal case. And while there may be some Chinese industries sufficiently far removed from security issues to permit business dealings, the oil industry is not a marginal case either. While Langdon's recusal was the proper course of action after having introduced CNOOC and Akin Gump, he could have avoided a great deal of negative scrutiny on both himself and his firm if he had avoided any relationship with CNOOC from the beginning.

A second objection was raised by *Washington Post* editorialist Robert Novak. In a column on Independence Day 2005, "Slick Lobbying for China," Novak noted that Akin Gump had previously represented Chevron as well; the firm had just cancelled its contract with Chevron in April. "Money talks in Washington, and it does not matter much who does the paying," concluded Novak.²³ The implication is that Akin Gump acted unethically by

²³ Novak, Robert. "Slick Lobbying for China". *Washington Post*. 4 July 2005. Available at <http://www.davidstuff.com/incorrect/novak3.htm>.

choosing the higher-paying foreign client over the longer-serving domestic one. (Akin Gump Chairman R. Bruce McLean responded with a letter to the editor, arguing that the firm had been upfront with both parties and had not “abandoned” any client.²⁴)

Novak seems to insinuate that Chevron deserved extra consideration not only because it was the older client but also because it was an American company. If there are similar contracts with two competing interests (one foreign, one domestic), should a firm give precedence to the American client? In this case, the answer must resolutely be “no.” A firm may choose its own clients. Not only did Akin Gump terminate its contract months before the buyout offer (and additionally, Chevron was hardly dependent solely on Akin Gump for its weighty lobbying portfolio in the first place²⁵), but it is a firm’s prerogative to decide whether it wants to represent a foreigner over an American client. While there may be public relations advantages to choosing the American, neither decision would be unethical provided that it discussed transparently with both parties.

The final objection was more fundamental: should Akin Gump ever have agreed to lobby for CNOOC in the first place because to do so might have been “unpatriotic”? Rep. Curt Weldon (R-Pa.) shared Novak’s conclusion that money trumped all, but added that greed had trumped Akin Gump’s patriotism: “Unfortunately, corporate dollars often transcend national security,” he said.²⁶ Most of Weldon’s colleagues agreed. By a vote of 398-15, the House passed a resolution declaring that the sale of Unocal would “threaten to impair the national security of the United States.”²⁷

Rep. Frank Wolf (R-Va.) wrote a strongly worded letter to Akin Gump expressing his “great disappointment and shock” that it would represent CNOOC, putting itself “on the

²⁴ McLean, R. Bruce. “China’s Oil Bid: Akin Gump Did the Right Thing”. *Washington Post*. 10 July 2005. Available at Lexis-Nexis.

²⁵ Republican fundraiser and lobbyist Wayne Berman of the Federalist Group, whose wife was President Bush’s social secretary, took primary responsibility for representing Chevron during the Unocal bid, in addition to Chevron’s in-house government relations department.

²⁶ Weisman, Jonathan. “Bush Advisor Helped Law Firm Land Job Lobbying for CNOOC”. *Washington Post*. 12 July 2005. p. D01.

²⁷ *Ibid.*

payroll of the Chinese government.”²⁸ “I would hope Akin Gump would drop the client,” said Wolf. “Just drop them; everyone makes a mistake.” Akin Gump responded to Rep. Wolf in a letter that blithely asserted, “Our client is not the government of China ... [lawmakers] should not be surprised.”²⁹ Hearings were held, and three of the four speakers (including former CIA chief James Woolsey) argued that Congress should consider blocking the acquisition based on disrupting China’s alleged goal of dominating the energy market.³⁰

This third ethical dilemma is an international variation on a fundamental lobbying question: when should a client be dropped because its interests are distasteful or against the lobbyist’s values? As with domestic lobbying, a client should never be accepted unless the firm is confident in its ability to represent it well; as Robert Healy puts it, “Everyone deserves a lawyer, not everyone deserves a lobbyist.”³¹ This basic rule applies to foreign lobbying as well. Before accepting a client, a lobbyist should make clear the role he or she is willing to play and where the boundaries lie. In this case, it seemed that Akin Gump sincerely believed it could represent CNOOC’s interests. The takeover certainly did not rise to the level of treason nor did it violate any American laws. CNOOC had a legitimate claim to make and Akin Gump helped them express it in Washington. The allegations of some congressmen that Akin Gump betrayed its country to the enemy is hyperbolic and should not have influenced the firm’s ethical calculations as it considered whether to take CNOOC as a client.

On July 22, the Unocal shareholders accepted Chevron’s offer. Arguments that selling Unocal to the Chinese would be a security risk and that Chevron was unable to fairly compete against a state-owned company carried the day. “CNOOC had no employees in the U.S.,” says Todd Malan. “Unocal had tons of outside consultants. CNOOC was outgunned from the

²⁸ Tiron, Roxana. “Wolf Growls at Lobbying for CNOOC”. *The Hill*. 14 July 2005. Available at <http://www.thehill.com/thehill/export/TheHill/News/Frontpage/071405/wolf.html>.

²⁹ *Ibid.*

³⁰ Lohr, Steve. “Unocal Bid Denounced at Hearing”. *New York Times*. 14 July 2005. Available at <http://www.nytimes.com/2005/07/14/business/worldbusiness/14unocal.html?ex=1278993600&en=e921ac6f7fa7e5f0&ei=5090&partner=rssuserland&emc=rss>.

³¹ Healy, Robert. Presentation to “The Ethics of Lobbying” class. Fall 2006.

get-go.”³² Although advocates of free markets and those most concerned about strong national security took different messages from the buyout’s resolution, the case raised important questions about the ethics of lobbying for foreign clients. Firstly, it showed that it can be more difficult to represent foreigners. Secondly, it underscored that the same basic ethical guidelines apply to all lobbying, domestic or foreign: obey regulations, respect members of government, be responsive, be accurate, and be upfront about political risks.³³ In Malan’s words, “The key to all advocacy ethics is transparency. If the interests of the advocate are clear, elected officials and the public that put them there are able to make discerning judgments.”³⁴ Transparency makes firms responsible for their actions before Congress and the public, the two ultimate judges on whether a given behavior is ethical.

There are some reasons that lobbyists may “prefer” a domestic client over a foreign one. Domestic clients may be easier to deal with because there are fewer cultural barriers, longer-established personal or political connections, a stronger emotional connection to the interest, etc. But these are practical, not ethical, considerations. It is an individual firm’s prerogative to weigh those factors for itself.

The Unocal case also demonstrates perhaps the greatest difference between domestic and foreign lobbying—national security implications must be handled sensitively. If a lobbyist has a personal involvement in the American intelligence community, for example, it would be best if they avoid representing countries that are top targets of intelligence gathering. “I believe Congress has a right and a need to know just how much that [a] government is spending for [lobbying in the U.S.], and whether American officials have been placed in conflict of interest situations,”³⁵ said Richard D’Amato, a long-time Democratic foreign policy advisor, as he testified about Unocal before Congress. This is reasonable and

³² Malan, Todd. Personal Interview. 17 Oct. 2006.

³³ Adapted from Michael Berman’s 6 Rules of Ethical Lobbying. Ethics and Lobbying Seminar. Fall 2006.

³⁴ Malan, Todd. Personal Interview. 17 Oct. 2006.

³⁵ D’Amato, Richard. “Statement of Hon. Richard D’Amato: National Security Dimensions of the Possible Acquisition of Unocal by CNOOC and the Role of CFIUS”. 13 July 2005. http://www.globalsecurity.org/military/library/congress/2005_hr/050713-damato.pdf

underscores the fact that transparency remains the prime ethical consideration when representing international, as well as domestic, clients.

In giving voice to foreign companies and countries, lobbyists help give Congress the broadest possible perspective on their policies. In our globalized world, policies can ripple across oceans and affect people half a world away. By obeying domestic all ethical guidelines (none more important than transparency), and being particularly aware of national security implications, lobbyists can successfully and ethically evolve into the age of globalized lobbying.

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