



U.S. SMALL BUSINESS ADMINISTRATION
WASHINGTON, D.C. 20416

OFFICE OF THE ADMINISTRATOR

November 5, 2018

Anne L. Weismann
Chief FOIA Counsel
455 Massachusetts Avenue, NW
Washington, DC 20001
aweismann@citizensforethics.org

Dear Ms. Weisman:

This letter is in response to your Freedom of Information Act ("FOIA") request No. SBA-2018-001117 in which you have requested the following:

- (1) copies of records sufficient to show all travel taken or planned by a presidentially-appointed Senate confirmed ("PAS") officials in the SBA to any event attended by a sitting member of the United States House of Representatives in that member's district between May 1, 2018 through November 6, 2018.
- (2) copies of records sufficient to show all the political events to which PAS officials in the SBA traveled from January 20, 2017 to the present, identifying the event, agency participants, and the costs of each trip.
- (3) copies of records sufficient to show all the political events PAS officials in the SBA are scheduled to attend in 2018, including but not limited to those events expected to have mixed travel, i.e., travel for official and political purposes, identifying the event, agency participants, and anticipated costs of each scheduled trip.
- (4) copies of records sufficient to show the formula the SBA uses to apportion costs incurred during travel that has both official and political components.
- (5) copies of all records concerning how the SBA ensures compliance with the Hatch Act's restrictions on political travel.

With respect to items 1 and 3, SBA has performed a search of its records and is releasing the attached travel authorizations which are responsive to your request. For purposes of clarification, the enclosed documents demonstrate three mixed travel trips for Administrator McMahon (Buffalo, NY; Kentucky and Ohio; and Orange County and Los Angeles, CA). The remaining information reflects travel by Administrator McMahon which focused on advancing the mission of the SBA and included participation by locally elected officials seeking to further the interests of SBA in serving the small businesses in and around their districts.

SBA has no documents responsive to item 2. In response to items 4 and 5, SBA is releasing in full a memo from SBA's Designated Agency Ethics Official.

If you are dissatisfied with the Agency's decision, you may file an administrative appeal within 90 days of the date of this letter to:

Office of Hearings and Appeals
Attention: Delorice Ford, FOIA Officer
409 3rd Avenue, SW – 8th Floor
Washington, DC 20416

If you are unable to resolve your FOIA dispute through our FOIA Public Liaison in the Office of Hearings and Appeals, the Office of Government Information Services (OGIS), the Federal FOIA Ombudsman's office, offers mediation services to help resolve disputes between FOIA requesters and Federal agencies. The contact information for OGIS is:

Office of Government Information Services
National Archives and Records Administration
8601 Adelphi Road--OGIS
College Park, MD 20740-6001
ogis@nara.gov
ogis.archives.gov
202-741-5770
877-684-6448

Sincerely,



Pradeep Belur
Chief of Staff

Document Header Information

Document Type: VCHI Document VCH022840
Name:
Travel TANUM030798 Trip Name: IGNITE - NY
Authorization
Number:
TA Date: 01/22/18 Currency: USD
Organization: SBA_HQ_201010_ADMINISTRATOR Current PAID
Status:
Purpose: 2110 -TDY (Non-Disaster/Disaster) Document Traveling on the IGNITE Tour to Buffalo, NY. **TRAVELER WILL
Detail: TRAVEL FROM BUFFALO VIA PRIVATE AIR AT NO COST TO THE
AGENCY.** -MIXED TRAVEL-
Type Code: 0000-Other

Traveler Profile

Name: MCMAHON, LINDA E ID: 1001179752
TID: 000739342 Organization: SBA_HQ_201010_ADMINISTRATOR
Duty Station: CARD HOLDER
Office Address: 409 3rd Street, S.W. Suite 7000
Washington, DC 20024 EMAIL: linda.mcmahon@sba.gov
Office Phone: [REDACTED] Cell Phone: [REDACTED]
Home Address: Home Phone: [REDACTED]
Alternate Address: Alternate Phone:

Document Information

Trip Number:
1
Purpose: Traveling on the IGNITE Tour to Buffalo, NY. **TRAVELER WILL TRAVEL FROM BUFFALO VIA PRIVATE AIR AT NO COST
TO THE AGENCY.** -MIXED TRAVEL-

Itinerary Locations

| From | To | Itinerary Location | Purpose | Per Diem Rates |
|----------|----------|--------------------|-----------------------------------|----------------|
| 01/19/18 | 01/20/18 | BUFFALO, NY | 2110 -TDY (Non-Disaster/Disaster) | 104.00 / 64.00 |

Document Totals

| | |
|----------------------------|--------|
| Total Expenses: | 571.86 |
| Reimbursable Expenses: | 571.86 |
| Non-Reimbursable Expenses: | .00 |
| Advance Applied: | .00 |
| Net to Traveler: | .00 |
| Net to Government: | 438.81 |
| Pay to Charge Card: | .00 |
| | 133.05 |

Document Totals by Expense Category

| Expense Category | Cost | Advance Amount |
|------------------|--------|----------------|
| Com. Carrier | 342.81 | .00 |
| Lodging | 118.30 | .00 |
| M&IE-PerDiem | 96.00 | .00 |
| Transxn Fees | 14.75 | .00 |
| Total Expenses: | 571.86 | .00 |

Trip 1 Details**Expenses**

Trip#: 1

Total Non-Per 371.86 Total Per Diem 200.00
Diem Expenses:

| | | | | |
|--|-----------------|--------------|--------|--------------|
| 01/19/2018 | Adjustments | Adjustments | .00 | CASH/OTHER |
| Comment: MIXED TRAVEL - Political Campaign cost to be reimbursed by Campaign to SBA per formula attached. | | | | |
| 01/19/2018 | Airline Flight | Com. Carrier | 342.81 | CASH/OTHER |
| Comment: **USE OF TMC HAS BEEN WAIVED. APPROVED MEMO ATTACHED. TRAVELER WILL BE REIMBURSED FOR FARE PURCHASED; AS IT IS LESS THAN THE TMC COACH FARE. **TRAVELER WILL TRAVEL FROM BUFFALO VIA PRIVATE AIR AT NO COST TO THE AGENCY.** | | | | |
| 01/19/2018 | Lodging | Lodging | 104.00 | IBA * |
| 01/19/2018 | Lodging Tax | Lodging | 14.30 | IBA |
| 01/19/2018 | M&IE | M&IE-PerDiem | 48.00 | CASH/OTHER * |
| 01/20/2018 | M&IE | M&IE-PerDiem | 48.00 | CASH/OTHER * |
| 01/22/2018 | TDY Voucher Fee | Transxn Fees | 14.75 | IBA |

Per Diem Allowances

Trip#: 1 Total Per Diem Allowances: 200.00

| Date | Rate | Ldg Cost | Ldg Allowed | M&IE Cost | M&IE Allowed | B L D Conf% |
|------------|---------------|----------|-------------|-----------|--------------|-------------|
| 01/19/2018 | 104.00/ 64.00 | 104.00 | 104.00 | 48.00 | 48.00 | |
| 01/20/2018 | 104.00/ 64.00 | 0.00 | 0.00 | 48.00 | 48.00 | |

Account Summary for the Selected Trip

| | | |
|--------------------------------|----------------------------------|--------|
| Org: | Label: 5944702 Acct Code: | 571.86 |
| SBA_HQ_201010_ADMINISTRATOR | | |
| Expense Category: Com. Carrier | Fiscal Year: 2018 Amount: 342.81 | |
| Expense Category: Lodging | Fiscal Year: 2018 Amount: 118.30 | |
| Expense Category: M&IE-PerDiem | Fiscal Year: 2018 Amount: 96.00 | |
| Expense Category: Transxn Fees | Fiscal Year: 2018 Amount: 14.75 | |
| Total: | | 571.86 |

Payment Detail Information

| Organization | Label | Accounting String | Payment Method | Amount |
|-----------------------------|---------|-------------------|----------------|--------|
| SBA_HQ_201010_ADMINISTRATOR | 5944702 | | CASH/OTHER | 438.81 |
| SBA_HQ_201010_ADMINISTRATOR | 5944702 | | IBA | 133.05 |
| Totals by Label | | | | |
| SBA_HQ_201010_ADMINISTRATOR | 5944702 | | | 571.86 |
| Total | | | | |

Totals by Payment Method

| | |
|------------|--------|
| CASH/OTHER | 438.81 |
| Total | |
| IBA Total | 133.05 |

Attachments

Attachments Exist


Receipt Checklist

| Date | Description | Cost |
|----------|--------------------|----------|
| 01/19/18 | Adjustments | \$0.00 |
| 01/19/18 | AIR Airline Flight | \$342.81 |
| 01/19/18 | Lodging | \$104.00 |
| 01/19/18 | Lodging Tax | \$14.30 |
| 01/19/18 | M&IE | \$48.00 |
| 01/20/18 | M&IE | \$48.00 |

Audits

| Audit Name | Result | Reason |
|------------|--------|--------|
|------------|--------|--------|

Document History 10/02/2018 VCH1: VCH022840**Copyright 1989-2009 Concur Government Edition: Concur Inc. MCMAHON, LINDA E. 000739342**

| STATUS | DATE | TIME | SIGNATURE NAME | REASON |
|----------------|------------|------------|--|------------------------------|
| CREATED | 01/22/2018 | 8:27AMEST |  | Explain in Comments section. |
| SIGNED | 01/23/2018 | 10:29AMEST | | |
| AUDIT PASS | 01/23/2018 | 12:51PMMST | | |
| RETURNED | 01/26/2018 | 12:58PMEST | | |
| ADJUSTED | 01/26/2018 | 12:58PMEST | | |
| SIGNED | 01/26/2018 | 1:06PMEST | | |
| AUDIT PASS | 01/29/2018 | 7:06AMMST | | |
| APPROVED | 01/29/2018 | 7:39AMEST | | |
| PENDING | 01/29/2018 | 7:39AMEST | | |
| FUNDS RESERVED | 01/29/2018 | 7:55AMEST | | |
| PAID | 01/30/2018 | 6:57AMEST | | |

I certify that the electronic signatures listed above are valid and on file**SIGNED DATE****Document Signatures**

Traveler/Preparer Name: _____
Traveler/Preparer Signature: _____
Date: _____
Approver Name: _____
Approver Signature: _____
Date: _____

MIXED TRAVEL CALCULATION

Buffalo, New York, January 19 & 20, 2018

EXPENSES:

| | Govt. Rate |
|------------------------|-----------------|
| Total Airfare | \$342.81 |
| Lodging (one night) | \$118.30 |
| Total Per Diem | \$96.00 |
| Other Expenses | \$14.75 |
| Total Expenses: | \$571.86 |

ACTIVITY TIME:

| | | Minutes | Percent of Time |
|----------------------------------|--------------|---------|-----------------|
| Time spent on Official Activity | See Official | 300 | 88% |
| Time spent on Political Activity | Schedule | 40 | 12% |

AMOUNTS OWED BY EACH PARTY:

| | Percent | Amount |
|------------------------------------|-------------|-----------------|
| Amount to be Paid by SBA | 88% | \$503.24 |
| Amount to be Paid by Private Party | 12% | \$68.62 |
| | <u>100%</u> | <u>\$571.86</u> |

Time and Cost Allocations

Approved by:



Robert L. Gangwere, Designated Agency Ethics Official



Date

Buffalo, NY, Mixed Travel Trip
January 19 & 20, 2018

Formula

Time spent in official meetings, receptions, etc. *plus*
Time spent in political meetings, receptions, rallies, etc. *equals*
Total activity time:

Time spent in official activity *divided by*
Total activity time *equals*
Percentage of trip that was official (rounded down)

Time spent in political activity *divided by*
Total activity time *equals*
Percentage of trip that was political (round up):

Percentage of trip that was political *multiplied by*
Total amount that would be reimbursed to the Government if all
of the travel was political *equals*
Total amount paid by the political campaign:

Calculation

300 min.
40 min.
340 min.

300 min.
340 min.
88%

40 min.
340 min.
12%

12%

\$571.86
\$68.62

Document Header Information

| | | | |
|---------------|-----------------------------------|-----------|--|
| Document | VCH1 | Document | VCH024466 |
| Type: | | Name: | |
| Travel | TANUM033077 | Trip | NSBW & ECU Commencement |
| Authorization | | Name: | |
| Number: | | Currency: | USD |
| TA Date: | 05/15/18 | Current | PAID |
| Organization: | SBA_HQ_201010_ADMINISTRATOR | Status: | |
| Purpose: | 2110 -TDY (Non-Disaster/Disaster) | Document | Traveling on the National Small Business Tour to Jacksonville, FL, Columbia, SC, Raleigh, NC, and Greenville, SC; Speaking at the East Carolina University Commencement Ceremony in Greenville, NC **USE OF TMC HAS BEEN WAIVED. APPROVED MEMO ATTACHED. TRAVELER WILL BE REIMBURSED FOR THE FARE PURCHASED AS IT WAS LESS EXPENSIVE THAN THE TMC COACH FARE. TRAVELER WILL TRAVEL FROM NORTH CAROLINA VIA PRIVATE AIR AT NO COST TO THE AGENCY.** |
| Type Code: | 0000-Other | | |

Traveler Profile

| | | | |
|--------------------|--|------------------|-----------------------------|
| Name: | MCMAHON, LINDA E | ID: | 1001179752 |
| TID: | 000739342 | Organization: | SBA_HQ_201010_ADMINISTRATOR |
| Duty Station: | | Card: | CARD HOLDER |
| Office Address: | 409 3rd Street, S.W. Suite 7000 Washington, DC 20024 | EMAIL: | linda.mcmahon@sba.gov |
| Office Phone: | | Cell Phone: | |
| Home Address: | | Home Phone: | |
| Alternate Address: | | Alternate Phone: | |

Document Information

Trip Number: 1

Purpose: Traveling on the National Small Business Tour to Jacksonville, FL, Columbia, SC, Raleigh, NC, and Greenville, SC; Speaking at the East Carolina University Commencement Ceremony in Greenville, NC **USE OF TMC HAS BEEN WAIVED. APPROVED MEMO ATTACHED. TRAVELER WILL BE REIMBURSED FOR THE FARE PURCHASED AS IT WAS LESS EXPENSIVE THAN THE TMC COACH FARE. TRAVELER WILL TRAVEL FROM NORTH CAROLINA VIA PRIVATE AIR AT NO COST TO THE AGENCY.**

| Itinerary Locations | | | | Per Diem Rates |
|---------------------|----------|--------------------|-----------------------------------|----------------|
| From | To | Itinerary Location | Purpose | |
| 04/30/18 | 05/01/18 | JACKSONVILLE, FL | 2110 -TDY (Non-Disaster/Disaster) | 93.00 / 51.00 |
| 05/01/18 | 05/02/18 | COLUMBIA, SC | 2110 -TDY (Non-Disaster/Disaster) | 105.00 / 59.00 |
| 05/02/18 | 05/03/18 | RALEIGH, NC | 2110 -TDY (Non-Disaster/Disaster) | 115.00 / 59.00 |
| 05/03/18 | 05/04/18 | GREENVILLE, NC | 2110 -TDY (Non-Disaster/Disaster) | 93.00 / 51.00 |

Document Totals

| | |
|----------------------------|----------|
| Total Expenses: | 1,223.43 |
| Reimbursable Expenses: | 1,223.43 |
| Non-Reimbursable Expenses: | .00 |
| Advance Applied: | .00 |
| Net to Traveler: | 245.50 |
| Net to Government: | .00 |
| Pay to Charge Card: | 977.93 |

Document Totals by Expense Category

| Expense Category | Cost | Advance Amount |
|------------------|----------|----------------|
| Com. Carrier | 465.64 | .00 |
| Lodging | 497.54 | .00 |
| M&IE-PerDiem | 245.50 | .00 |
| Transxn Fees | 14.75 | .00 |
| Total Expenses: | 1,223.43 | .00 |

Trip 1 Details**Expenses**

| Trip#: 1 | | Total Non-Per Diem Expenses: | 538.93 | Total Per Diem Expenses: | 684.50 |
|---|-----------------|------------------------------|--------|--------------------------|----------|
| Date | Description | Category | Cost | Pay Method | Per Diem |
| 04/30/2018 | Airline Flight | Com. Carrier | 465.64 | IBA | |
| Comment: **USE OF TMC HAS BEEN WAIVED. APPROVED MEMO ATTACHED. TRAVELER WILL BE REIMBURSED FOR THE FARE PURCHASED AS IT WAS LESS EXPENSIVE THAN THE TMC COACH FARE.** | | | | | |
| 04/30/2018 | Lodging | Lodging | 219.00 | IBA | * |
| Comment: Approved Actual Subsistence Request attached. | | | | | |
| 04/30/2018 | Lodging Tax | Lodging | 28.60 | IBA | |
| 04/30/2018 | M&IE | M&IE-PerDiem | 38.25 | CASH/OTHER | * |
| 05/01/2018 | Lodging | Lodging | 105.00 | IBA | * |
| 05/01/2018 | Lodging Tax | Lodging | 14.70 | IBA | |
| 05/01/2018 | M&IE | M&IE-PerDiem | 59.00 | CASH/OTHER | * |
| 05/02/2018 | Lodging | Lodging | 115.00 | IBA | * |
| 05/02/2018 | Lodging Tax | Lodging | 15.24 | IBA | |
| 05/02/2018 | M&IE | M&IE-PerDiem | 59.00 | CASH/OTHER | * |
| 05/03/2018 | Lodging | Lodging | .00 | IBA | * |
| Comment: Lodging reimbursement will be processed once invoice is amended by Greenville Hilton. At this time, traveler's travel card has not been charged for lodging on this date. | | | | | |
| 05/03/2018 | M&IE | M&IE-PerDiem | 51.00 | CASH/OTHER | * |
| 05/04/2018 | M&IE | M&IE-PerDiem | 38.25 | CASH/OTHER | * |
| 05/15/2018 | TDY Voucher Fee | Transxn Fees | 14.75 | IBA | |

Per Diem Allowances

Trip#: 1 Total Per Diem Allowances: 684.50

| Date | Rate | Ldg Cost | Ldg Allowed | M&IE Cost | M&IE Allowed | B L D Conf% |
|------------|---------------|----------|-------------|-----------|--------------|-------------|
| 04/30/2018 | 93.00/ 51.00 | 219.00 | 219.00 | 38.25 | 38.25 | |
| 05/01/2018 | 105.00/ 59.00 | 105.00 | 105.00 | 59.00 | 59.00 | |
| 05/02/2018 | 115.00/ 59.00 | 115.00 | 115.00 | 59.00 | 59.00 | |
| 05/03/2018 | 93.00/ 51.00 | 0.00 | 0.00 | 51.00 | 51.00 | |
| 05/04/2018 | 93.00/ 51.00 | 0.00 | 0.00 | 38.25 | 38.25 | |

Account Summary for the Selected Trip

| | | | |
|--------------------------------|--------------|----------------|----------|
| Org: | Label: | Acct Code: | 1,223.43 |
| SBA_HQ_201010_ADMINISTRATOR | 5944702 | | |
| Expense Category: Com. Carrier | Fiscal Year: | Amount: 465.64 | |
| | 2018 | | |
| Expense Category: Lodging | Fiscal Year: | Amount: 497.54 | |
| | 2018 | | |
| Expense Category: M&IE-PerDiem | Fiscal Year: | Amount: 245.50 | |
| | 2018 | | |
| Expense Category: Transxn Fees | Fiscal Year: | Amount: 14.75 | |
| | 2018 | | |
| Total: | | | 1,223.43 |

Payment Detail Information

| Organization | Label | Accounting String | Payment Method | Amount |
|-----------------------------|---------|-------------------|----------------|--------|
| SBA_HQ_201010_ADMINISTRATOR | 5944702 | | CASH/OTHER | 245.50 |
| SBA_HQ_201010_ADMINISTRATOR | 5944702 | | IBA | 977.93 |

Totals by Label

| | | | |
|-----------------------------|---------|--|----------|
| SBA_HQ_201010_ADMINISTRATOR | 5944702 | | 1,223.43 |
| Total | | | |

CASH/OTHER 245.50
Total
IBA Total 977.93

Attachments

Attachments Exist

Receipt Checklist

| Date | Description | Cost |
|----------|--------------------|----------|
| 04/30/18 | AIR Airline Flight | \$465.64 |
| 04/30/18 | Lodging | \$219.00 |
| 04/30/18 | Lodging Tax | \$28.60 |
| 04/30/18 | M&IE | \$38.25 |
| 05/01/18 | Lodging | \$105.00 |
| 05/01/18 | Lodging Tax | \$14.70 |
| 05/01/18 | M&IE | \$59.00 |
| 05/02/18 | Lodging | \$115.00 |
| 05/02/18 | Lodging Tax | \$15.24 |
| 05/02/18 | M&IE | \$59.00 |
| 05/03/18 | M&IE | \$51.00 |
| 05/04/18 | M&IE | \$38.25 |
| 05/15/18 | TDY Voucher Fee | \$14.75 |

Audits

| Audit Name | Result | Reason |
|------------|--------|--------|
|------------|--------|--------|

Document History 10/02/2018 VCH1: VCH024466

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| STATUS | DATE | TIME | SIGNATURE NAME | REASON |
|----------------|------------|------------|--|------------------------------|
| CREATED | 05/15/2018 | 1:38PMEST |  | Explain in Comments section. |
| SIGNED | 06/06/2018 | 1:06PMEST | | |
| ADJUSTED | 06/06/2018 | 1:15PMEST | | |
| SIGNED | 06/06/2018 | 1:24PMEST | | |
| _RETURNED | 06/06/2018 | 3:03PMEST | | |
| ADJUSTED | 06/12/2018 | 9:49AMEST | | |
| ADJUSTED | 06/12/2018 | 10:34AMEST | | |
| ADJUSTED | 06/18/2018 | 7:28AMEST | | |
| SIGNED | 06/18/2018 | 7:31AMEST | | |
| AUDIT PASS | 06/19/2018 | 8:42AMEST | | |
| APPROVED | 06/20/2018 | 7:43AMEST | | |
| PENDING | 06/20/2018 | 7:43AMEST | | |
| FUNDS RESERVED | 06/20/2018 | 7:55AMEST | | |
| PAID | 06/21/2018 | 6:56AMEST | | |

I certify that the electronic signatures listed above are valid and on file

SIGNED DATE

Document Signatures

Traveler/Preparer Name: _____
Traveler/Preparer Signature: _____
Date: _____
Approver Name: _____
Approver Signature: _____
Date: _____

Document Header Information

| | | | |
|-----------------------|-----------------------------------|------------------|--|
| Document Type: | VCH1 | Document | VCH025425 |
| Travel | TANUM035364 | Name: | |
| Authorization Number: | | Trip Name: | America West Lending Conference & IGNITE - CA |
| TA Date: | 07/03/18 | Currency: | USD |
| Organization: | SBA_HQ_201010_ADMINISTRATOR | Current | FUNDS RESERVED |
| Purpose: | 2110 -TDY (Non-Disaster/Disaster) | Status: | |
| Type Code: | 0000-Other | Document Detail: | Speaking at the America West Lending Conference in Cosa Mesa, Ca and traveling on the IGNITE Tour to Orange County and Los Angeles, CA. **TRAVELER WILL TRAVEL RT VIA PRIVATE AIR AT NO COST TO THE AGENCY.** |

Traveler Profile

| | | | |
|--------------------|--|------------------|-----------------------------|
| Name: | MCMAHON, LINDA E | ID: | 1001179752 |
| TID: | 000739342 | Organization: | SBA_HQ_201010_ADMINISTRATOR |
| Duty Station: | | Card: | CARD HOLDER |
| Office Address: | 409 3rd Street, S.W. Suite 7000 Washington, DC 20024 | EMAIL: | linda.mcmahon@sba.gov |
| Office Phone: | | Cell Phone: | |
| Home Address: | | Home Phone: | |
| Alternate Address: | | Alternate Phone: | |

Document Information

Trip Number: 1

Purpose: Speaking at the America West Lending Conference in Cosa Mesa, Ca and traveling on the IGNITE Tour to Orange County and Los Angeles, CA. **TRAVELER WILL TRAVEL RT VIA PRIVATE AIR AT NO COST TO THE AGENCY.**

Itinerary Locations

| From | To | Itinerary Location | Purpose | Per Diem Rates |
|----------|----------|--------------------|-----------------------------------|----------------|
| 06/21/18 | 06/22/18 | IRVINE, CA | 2110 -TDY (Non-Disaster/Disaster) | 173.00 / 64.00 |

Document Totals

| | |
|----------------------------|--------|
| Total Expenses: | 301.55 |
| Reimbursable Expenses: | 301.55 |
| Non-Reimbursable Expenses: | .00 |
| Advance Applied: | .00 |
| Net to Traveler: | 96.00 |
| Net to Government: | .00 |
| Pay to Charge Card: | 205.55 |

Document Totals by Expense Category

| Expense Category | Cost | Advance Amount |
|------------------|--------|----------------|
| Lodging | 190.80 | .00 |
| M&IE-PerDiem | 96.00 | .00 |
| Transxn Fees | 14.75 | .00 |
| Total Expenses: | 301.55 | .00 |

Trip 1 Details**Expenses**

| Trip#: 1 | Total Non-Per Diem Expenses: | 32.55 | Total Per Diem Expenses: | 269.00 | |
|----------|------------------------------|----------|--------------------------|------------|----------|
| Date | Description | Category | Cost | Pay Method | Per Diem |

| | | | | | |
|-------------------------------------|---------------------|--------------|-------|------------|---|
| 06/21/2018 | M&IE | M&IE-PerDiem | 48.00 | CASH/OTHER | * |
| 06/21/2018 | Additional TMC Fees | Transxn Fees | .00 | IBA | |
| Comment: Mixed Travel Documentation | | | | | |
| 06/22/2018 | M&IE | M&IE-PerDiem | 48.00 | CASH/OTHER | * |
| 07/03/2018 | TDY Voucher Fee | Transxn Fees | 14.75 | IBA | |

Per Diem Allowances

Trip#: 1 Total Per Diem Allowances: 269.00

| Date | Rate | Ldg Cost | Ldg Allowed | M&IE Cost | M&IE Allowed | B L D Conf% |
|------------|---------------|----------|-------------|-----------|--------------|-------------|
| 06/21/2018 | 173.00/ 64.00 | 173.00 | 173.00 | 48.00 | 48.00 | |
| 06/22/2018 | 173.00/ 64.00 | 0.00 | 0.00 | 48.00 | 48.00 | |

Account Summary for the Selected Trip

Org: SBA_HQ_201010_ADMINISTRATOR Label: 5944702 Acct Code: 301.55
Expense Category: Lodging Fiscal Year: 2018 Amount: 190.80
Expense Category: M&IE-PerDiem Fiscal Year: 2018 Amount: 96.00
Expense Category: Transxn Fees Fiscal Year: 2018 Amount: 14.75
Total: 301.55

Payment Detail Information

| Organization | Label | Accounting String | Payment Method | Amount |
|-----------------------------|---------|-------------------|----------------|--------|
| SBA_HQ_201010_ADMINISTRATOR | 5944702 | | CASH/OTHER | 96.00 |
| SBA_HQ_201010_ADMINISTRATOR | 5944702 | | IBA | 205.55 |
| Totals by Label | | | | |
| SBA_HQ_201010_ADMINISTRATOR | 5944702 | | | 301.55 |
| Total | | | | |

Totals by Payment Method

CASH/OTHER 96.00
Total
IBA Total 205.55

Attachments

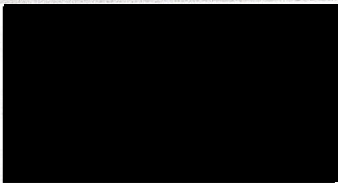
Attachments Exist

Receipt Checklist

| Date | Description | Cost |
|----------|---------------------|----------|
| 06/21/18 | Lodging | \$173.00 |
| 06/21/18 | Lodging Tax | \$17.80 |
| 06/21/18 | M&IE | \$48.00 |
| 06/21/18 | Additional TMC Fees | \$0.00 |
| 06/22/18 | M&IE | \$48.00 |
| 07/03/18 | TDY Voucher Fee | \$14.75 |

Audits

| Audit Name | Result | Reason |
|------------|--------|--------|
|------------|--------|--------|

| STATUS | DATE | TIME | SIGNATURE NAME | REASON |
|----------------|------------|------------|---|--------|
| CREATED | 07/03/2018 | 11:44AMEST |  | |
| SIGNED | 07/20/2018 | 10:42AMEST | | |
| AUDIT PASS | 07/22/2018 | 4:18PMMST | | |
| APPROVED | 07/27/2018 | 2:16PMEST | | |
| PENDING | 07/27/2018 | 2:17PMEST | | |
| FUNDS RESERVED | 07/29/2018 | 10:39AMEST | | |

I certify that the electronic signatures listed above are valid and on file

SIGNED DATE

Document Signatures

Traveler/Preparer Name: _____
 Traveler/Preparer Signature: _____
 Date: _____
 Approver Name: _____
 Approver Signature: _____
 Date: _____

MIXED TRAVEL CALCULATION

Orange County & Los Angeles, CA , June 21, 22, 2018

EXPENSES:

| | Govt. Rate |
|------------------------|-----------------|
| Total Airfare | \$0.00 |
| Lodging (one night) | \$193.00 |
| Total Per Diem | \$96.00 |
| Other Expenses | \$89.75 |
| Total Expenses: | \$378.75 |

ACTIVITY TIME:

| | | Minutes | Percent of Time |
|----------------------------------|--------------|---------|-----------------|
| Time spent on Official Activity | See Official | 308 | 57% |
| Time spent on Political Activity | Schedule | 234 | 43% |

AMOUNTS OWED BY EACH PARTY:

| | Percent | Amount |
|------------------------------------|-------------|-----------------|
| Amount to be Paid by SBA | 57% | \$215.89 |
| Amount to be Paid by Private Party | 43% | \$162.86 |
| | <u>100%</u> | <u>\$378.75</u> |

Time and Cost Allocations

Approved by:


 Susan L. Sundberg, Designated Agency Ethics Official (A)

7-10-18
 Date

Orange County & Los Angeles, CA, Mixed Travel Trip

June 21-22, 2018

Formula

Calculation

Time spent in official meetings, receptions, etc. *plus*
Time spent in political meetings, receptions, rallies, etc. *equals*
Total activity time:

308 min.
234 min.
542 min.

Time spent in official activity *divided by*
Total activity time *equals*
Percentage of trip that was official (rounded down)

308 min.
542 min.
57%

Time spent in political activity *divided by*
Total activity time *equals*
Percentage of trip that was political (round up):

234 min.
542 min.
43%

Percentage of trip that was political *multiplied by*
Total amount that would be reimbursed to the Government if all
of the travel was political *equals*
Total amount paid by the political campaign:

43%

\$378.75
\$162.86

Document Header Information

Document Type: VCH1 Document VCH026758
Name:
Travel TANUM035880 Trip Name: IGNITE - KY; Small Business RT - OH
Authorization Number:
TA Date: 08/23/18 Currency: USD
Organization: SBA_HQ_201010_ADMINISTRATOR Current PAID
Status:
Purpose: 2110 -TDY (Non-Disaster/Disaster) Document Traveing on the IGNITE Tour to Louisville, KY and hosting a small business roundtable with Congressman Chabot in Cinnccinati, OH. **TRAVELER WILL TRAVEL RT VIA PRIVATE AIR AT NO COST TO THE AGENCY.**
Detail:
Type Code: 0000-Other

Traveler Profile

Name: MCMAHON, LINDA E ID: 1001179752
TID: 000739342 Organization: SBA_HQ_201010_ADMINISTRATOR
Duty Station: Card: CARD HOLDER
Office Address: 409 3rd Street, S.W. Suite 7000
Washington, DC 20024 EMAIL: linda.mcmahon@sba.gov
Office Phone: Cell Phone:
Home Address: Home Phone:
Alternate Address: Alternate Phone:

Document Information

Trip
Number: 1
Purpose: Traveing on the IGNITE Tour to Louisville, KY and hosting a small business roundtable with Congressman Chabot in Cinnccinati, OH.
TRAVELER WILL TRAVEL RT VIA PRIVATE AIR AT NO COST TO THE AGENCY.

Itinerary Locations

| From | To | Itinerary Location | Purpose | Per Diem Rates |
|----------|----------|--------------------|-----------------------------------|----------------|
| 07/26/18 | 07/27/18 | CINCINNATI, OH | 2110 -TDY (Non-Disaster/Disaster) | 141.00 / 69.00 |

Document Totals

| | |
|----------------------------|--------|
| Total Expenses: | 292.19 |
| Reimbursable Expenses: | 292.19 |
| Non-Reimbursable Expenses: | .00 |
| Advance Applied: | .00 |
| Net to Traveler: | 103.50 |
| Net to Government: | .00 |
| Pay to Charge Card: | 188.69 |

Document Totals by Expense Category

| Expense Category | Cost | Advance Amount |
|------------------|--------|----------------|
| Lodging | 165.68 | .00 |
| M&IE-PerDiem | 103.50 | .00 |
| Transxn Fees | 23.01 | .00 |
| Total Expenses: | 292.19 | .00 |

Trip 1 Details**Expenses**

| Trip#: 1 | Total Non-Per Diem Expenses: | 47.69 | Total Per Diem Expenses: | 244.50 | |
|------------|------------------------------|--------------|--------------------------|------------|----------|
| Date | Description | Category | Cost | Pay Method | Per Diem |
| 07/23/2018 | Travel Fee | Transxn Fees | 8.26 | IBA | |

| | | | | | |
|------------|-----------------|--------------|--------|------------|---|
| 07/26/2018 | Lodging Tax | Lodging | 24.68 | IBA | |
| 07/26/2018 | Lodging | Lodging | 141.00 | IBA | * |
| 07/26/2018 | M&IE | M&IE-PerDiem | 51.75 | CASH/OTHER | * |
| 07/27/2018 | M&IE | M&IE-PerDiem | 51.75 | CASH/OTHER | * |
| 08/23/2018 | TDY Voucher Fee | Transxn Fees | 14.75 | IBA | |

Per Diem Allowances

Trip#: 1 Total Per Diem Allowances: 244.50

| Date | Rate | Ldg Cost | Ldg Allowed | M&IE Cost | M&IE Allowed | B L D Conf% |
|------------|---------------|----------|-------------|-----------|--------------|-------------|
| 07/26/2018 | 141.00/ 69.00 | 141.00 | 141.00 | 51.75 | 51.75 | |
| 07/27/2018 | 141.00/ 69.00 | 0.00 | 0.00 | 51.75 | 51.75 | |

Account Summary for the Selected Trip

Org: Label: 5944702 Acct Code: 292.19
SBA_HQ_201010_ADMINISTRATOR
Expense Category: Lodging Fiscal Year: Amount: 165.68
2018
Expense Category: M&IE-PerDiem Fiscal Year: Amount: 103.50
2018
Expense Category: Transxn Fees Fiscal Year: Amount: 23.01
2018
Total: 292.19

Payment Detail Information

| Organization | Label | Accounting String | Payment Method | Amount |
|-----------------------------|---------|-------------------|----------------|--------|
| SBA_HQ_201010_ADMINISTRATOR | 5944702 | | CASH/OTHER | 103.50 |
| SBA_HQ_201010_ADMINISTRATOR | 5944702 | | IBA | 188.69 |
| Totals by Label | | | | |
| SBA_HQ_201010_ADMINISTRATOR | 5944702 | | | 292.19 |
| Total | | | | |

Totals by Payment Method

CASH/OTHER 103.50
Total
IBA Total 188.69

Attachments

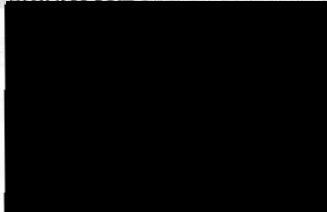
Attachments Exist

Receipt Checklist

| Date | Description | Cost |
|----------|-----------------|----------|
| 07/23/18 | Travel Fee | \$8.26 |
| 07/26/18 | Lodging Tax | \$24.68 |
| 07/26/18 | Lodging | \$141.00 |
| 07/26/18 | M&IE | \$51.75 |
| 07/27/18 | M&IE | \$51.75 |
| 08/23/18 | TDY Voucher Fee | \$14.75 |

Audits

| Audit Name | Result | Reason |
|------------|--------|--------|
|------------|--------|--------|

| STATUS | DATE | TIME | SIGNATURE NAME | REASON |
|----------------|------------|-----------|---|--------|
| CREATED | 08/23/2018 | 8:51AMEST |  | |
| SIGNED | 08/23/2018 | 9:17AMEST | | |
| AUDIT PASS | 08/24/2018 | 5:21AMMST | | |
| APPROVED | 08/24/2018 | 5:53AMEST | | |
| PENDING | 08/24/2018 | 5:53AMEST | | |
| FUNDS RESERVED | 08/24/2018 | 6:17AMEST | | |
| PAID | 08/27/2018 | 6:59AMEST | | |

I certify that the electronic signatures listed above are valid and on file

SIGNED DATE

Document Signatures

Traveler/Preparer Name: _____
 Traveler/Preparer Signature: _____
 Date: _____
 Approver Name: _____
 Approver Signature: _____
 Date: _____

MIXED TRAVEL CALCULATION

KY/OH: July 26 - 27, 2018

EXPENSES:

| | Govt. Rate |
|------------------|------------|
| Total Airfare | \$285.20 |
| Hotels (1 night) | \$171.00 |
| Total Per Diem | \$103.50 |
| Other Expenses | \$148.01 |

Total Expenses: \$707.71

ACTIVITY TIME:

| | | Hours | Percent of Time |
|-----------------------------------|--------------|-------|-----------------|
| Hours Spent on Official Activity | See Official | 4.67 | 83% |
| Hours Spent on Political Activity | Schedule | 0.98 | 17% |

AMOUNTS OWED BY EACH PARTY:

| | Percent | Amount |
|------------------------------------|-------------|-----------------|
| Amount to be Paid by SBA | 83% | \$587.40 |
| Amount to be Paid by Private Party | 17% | \$120.31 |
| | <u>100%</u> | <u>\$707.71</u> |

Time and Cost Allocations

Approved by:


 Susan L. Sundberg
 Alternate Designated Ethics Official

9-13-18
 Date

Kentucky/Ohio Mixed Travel Trip
July 26-27, 2018

Formula

Time spent in official meetings, receptions, etc. *plus*
Time spent in political meetings, receptions, rallies, etc. *equals*
Total activity time:

Time spent in official activity *divided by*
Total activity time *equals*
Percentage of trip that was official:

Time spent in political activity *divided by*
Total activity time *equals*
Percentage of trip that was political:

Percentage of trip that was political *multiplied by*
Total amount that would be reimbursed to the Government if all
of the travel was political *equals*
Total amount paid by the political campaign:

Calculation

280 min. (4.67 hr.)
59 min. (0.98 hr.)
339 min. (5.65 hr.)

280 min. (4.67 hr.)
339 min. (5.65 hr.)
82.6% (83%)

59 min. (0.98 hr.)
339 min. (5.65 hr.)
17.4% (17%)

17%

\$707.71
\$120.31

Document Header Information

Document Type: VCHI Document VCH026762
Name:
Travel TANUM036181 Trip Name: IGNITE - WI & MN
Authorization
Number:
TA Date: 08/23/18 Currency: USD
Organization: SBA_HQ_201010_ADMINISTRATOR Current PAID
Status:
Purpose: 2110 -TDY (Non-Disaster/Disaster) Document Traveling on the IGNITE Tour to Green Bay, WI and Minneapolis, MN.
Detail: **TRAVELER WILL TRAVEL TO GREEN BAY VIA PRIVATE AIR AT NO COST TO THE AGENCY.**
Type Code: 0000-Other

Traveler Profile

Name: MCMAHON, LINDA E ID: 1001179752
TID: 000739342 Organization: SBA_HQ_201010_ADMINISTRATOR
Duty Station: CARD HOLDER
Office Address: 409 3rd Street, S.W. Suite 7000
 Washington, DC 20024 EMAIL: linda.mcmahon@sba.gov
Office Phone: Cell Phone:
Home Address: Home Phone:
Alternate Address: Alternate Phone:

Document Information

Trip
Number: 1
Purpose: Traveling on the IGNITE Tour to Green Bay, WI and Minneapolis, MN. **TRAVELER WILL TRAVEL TO GREEN BAY VIA PRIVATE AIR AT NO COST TO THE AGENCY.**

Itinerary Locations

| From | To | Itinerary Location | Purpose | Per Diem Rates |
|----------|----------|--------------------|-----------------------------------|----------------|
| 08/12/18 | 08/13/18 | GREEN BAY, WI | 2110 -TDY (Non-Disaster/Disaster) | 93.00 / 51.00 |

Document Totals

| | |
|----------------------------|--------|
| Total Expenses: | 753.91 |
| Reimbursable Expenses: | 753.91 |
| Non-Reimbursable Expenses: | .00 |
| Advance Applied: | .00 |
| Net to Traveler: | 632.90 |
| Net to Government: | .00 |
| Pay to Charge Card: | 121.01 |

Document Totals by Expense Category

| Expense Category | Cost | Advance Amount |
|------------------|--------|----------------|
| Com. Carrier | 556.40 | .00 |
| Lodging | 106.26 | .00 |
| M&IE-PerDiem | 76.50 | .00 |
| Transxn Fees | 14.75 | .00 |
| Total Expenses: | 753.91 | .00 |

Trip 1 Details**Expenses**

| | | | | |
|----------|------------------------------|--------|--------------------------|--------|
| Trip#: 1 | Total Non-Per Diem Expenses: | 585.41 | Total Per Diem Expenses: | 168.50 |
|----------|------------------------------|--------|--------------------------|--------|

| | | | | |
|---|--------------|--------|------------|---|
| 08/12/2018Lodging | Lodging | 92.00 | IBA | * |
| 08/12/2018Lodging Tax | Lodging | 14.26 | IBA | |
| 08/12/2018M&IE | M&IE-PerDiem | 38.25 | CASH/OTHER | * |
| 08/13/2018Airline Flight | Com. Carrier | 556.40 | CASH/OTHER | |
| Comment: **USE OF TMC HAS BEEN WAIVED. APPROVED MEMO ATTACHED. TRAVELER WILL BE REIMBURSED FOR THE TMC COACH FARE.** | | | | |
| 08/13/2018M&IE | M&IE-PerDiem | 38.25 | CASH/OTHER | * |
| 08/23/2018TDY Voucher Fee | Transxn Fees | 14.75 | IBA | |

Per Diem Allowances

Trip#: 1 Total Per Diem Allowances: 168.50

| Date | Rate | Ldg Cost | Ldg Allowed | M&IE Cost | M&IE Allowed | B L D Conf% |
|------------|--------------|----------|-------------|-----------|--------------|-------------|
| 08/12/2018 | 93.00/ 51.00 | 92.00 | 92.00 | 38.25 | 38.25 | |
| 08/13/2018 | 93.00/ 51.00 | 0.00 | 0.00 | 38.25 | 38.25 | |

Account Summary for the Selected Trip

| | | | |
|--------------------------------|-------------------|----------------|--------|
| Org: | Label: 5944702 | Acct Code: | 753.91 |
| SBA_HQ_201010_ADMINISTRATOR | | | |
| Expense Category: Com. Carrier | Fiscal Year: 2018 | Amount: 556.40 | |
| Expense Category: Lodging | Fiscal Year: 2018 | Amount: 106.26 | |
| Expense Category: M&IE-PerDiem | Fiscal Year: 2018 | Amount: 76.50 | |
| Expense Category: Transxn Fees | Fiscal Year: 2018 | Amount: 14.75 | |
| | Total: | | 753.91 |

Payment Detail Information

| Organization | Label | Accounting String | Payment Method | Amount |
|-----------------------------|---------|-------------------|----------------|--------|
| SBA_HQ_201010_ADMINISTRATOR | 5944702 | | CASH/OTHER | 632.90 |
| SBA_HQ_201010_ADMINISTRATOR | 5944702 | | IBA | 121.01 |
| Totals by Label | | | | |
| SBA_HQ_201010_ADMINISTRATOR | 5944702 | | | 753.91 |
| | Total | | | |

Totals by Payment Method

| | |
|------------|--------|
| CASH/OTHER | 632.90 |
| Total | |
| IBA Total | 121.01 |

Attachments

Attachments Exist

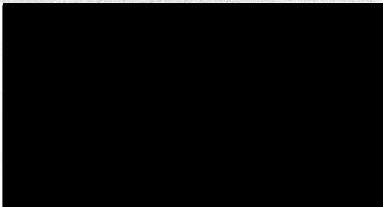
Receipt Checklist

| Date | Description | Cost |
|----------|--------------------|----------|
| 08/12/18 | Lodging | \$92.00 |
| 08/12/18 | Lodging Tax | \$14.26 |
| 08/12/18 | M&IE | \$38.25 |
| 08/13/18 | AIR Airline Flight | \$556.40 |
| 08/13/18 | M&IE | \$38.25 |
| 08/23/18 | TDY Voucher Fee | \$14.75 |

Audits

Document History 10/02/2018 VCH1: VCH026762

Copyright 1989-2009 Concur Government Edition: Concur Inc. MCMAHON, LINDA E. 000739342

| STATUS | DATE | TIME | SIGNATURE NAME | REASON |
|----------------|------------|------------|--|--------|
| CREATED | 08/23/2018 | 9:30AMEST |  | |
| SIGNED | 08/23/2018 | 10:18AMEST | | |
| AUDIT PASS | 08/24/2018 | 11:48AMEST | | |
| APPROVED | 08/24/2018 | 12:43PMEST | | |
| PENDING | 08/24/2018 | 12:43PMEST | | |
| FUNDS RESERVED | 08/24/2018 | 12:57PMEST | | |
| PAID | 08/28/2018 | 6:29AMEST | | |

I certify that the electronic signatures listed above are valid and on file

SIGNED DATE

Document Signatures

Traveler/Preparer Name: _____
Traveler/Preparer Signature: _____
Date: _____
Approver Name: _____
Approver Signature: _____
Date: _____

Document Header Information

| | | | |
|------------------------------|-----------------------------------|------------------|--|
| Document Type: | VCH1 | Document Name: | VCH026763 |
| Travel Authorization Number: | TANUM036746 | Trip Name: | Roundtable - NY |
| TA Date: | 08/23/18 | Currency: | USD |
| Organization: | SBA_HQ_201010_ADMINISTRATOR | Current Status: | PAID |
| Purpose: | 2110 -TDY (Non-Disaster/Disaster) | Document Detail: | Hosting a Small Business Roundtable in Madison, NY. **TRAVELER WILL TRAVEL TO NEW YORK VIA PRIVATE AIR AT NO COST TO THE AGENCY.** |
| Type Code: | 0000-Other | | |

Traveler Profile

| | | | |
|--------------------|--|------------------|-----------------------------|
| Name: | MCPAHON, LINDA E | ID: | 1001179752 |
| TID: | 000739342 | Organization: | SBA_HQ_201010_ADMINISTRATOR |
| Duty Station: | | Card: | CARD HOLDER |
| Office Address: | 409 3rd Street, S.W. Suite 7000 Washington, DC 20024 | EMAIL: | linda.mcmahon@sba.gov |
| Office Phone: | | Cell Phone: | |
| Home Address: | | Home Phone: | |
| Alternate Address: | | Alternate Phone: | |

Document Information

Trip Number: 1

Purpose: Hosting a Small Business Roundtable in Madison, NY. **TRAVELER WILL TRAVEL TO NEW YORK VIA PRIVATE AIR AT NO COST TO THE AGENCY.**

Itinerary Locations

| From | To | Itinerary Location | Purpose | Per Diem Rates |
|----------|----------|--------------------|---------|----------------|
| 08/20/18 | 08/20/18 | MADISON COUNTY, NY | | 93.00 / 51.00 |

Document Totals

| | |
|----------------------------|--------|
| Total Expenses: | 256.01 |
| Reimbursable Expenses: | 256.01 |
| Non-Reimbursable Expenses: | .00 |
| Advance Applied: | .00 |
| Net to Traveler: | .00 |
| Net to Government: | .00 |
| Pay to Charge Card: | 256.01 |

Document Totals by Expense Category

| Expense Category | Cost | Advance Amount |
|------------------|--------|----------------|
| Com. Carrier | 233.00 | .00 |
| Transxn Fees | 23.01 | .00 |
| Total Expenses: | 256.01 | .00 |

Trip 1 Details**Reservations Summary**

| Reservation Type | Vendor | Ticket# | Location | Cost |
|------------------|--------|------------|----------|--------|
| COMM-CARR | United | 1004476546 | | 233.20 |

From: SYR-Syracuse, NY (USA) TO: IAD-Washington, DC (USA) (Dulles Apt)

Air

Monday August 20, 2018

SYR-Syracuse, NY (USA) to IAD-Washington, DC (USA)

Aug 20 United 4716
Syracuse, NY (USA) 08/20/2018 2:35PM
Confirmation Number: AVMBHR

Duration: 1 Hour 16 Minutes Nonstop
Washington, DC (USA) (Dulles Apt) 08/20/2018 3:51PM

Flight Information
Distance 296 miles
No Seat Assigned

Emissions 115.4 lbs of CO2
Cost 233.20 USD

SYR-Syracuse, NY (USA) to IAD-Washington, DC (USA)

Aug 20 United 4716
Syracuse, NY (USA) 08/20/2018 2:35PM
Confirmation Number: AVMBHR

Duration: 1 Hour 16 Minutes Nonstop
Washington, DC (USA) (Dulles Apt) 08/20/2018 3:51PM

Flight Information
Distance 296 miles
No Seat Assigned

Emissions 115.4 lbs of CO2
Cost 233.20 USD

Expenses

| Trip#: 1 | | Total Non-Per Diem Expenses: | 256.01 | Total Per Diem Expenses: | .00 |
|--|-----------------|------------------------------|--------|--------------------------|----------|
| Date | Description | Category | Cost | Pay Method | Per Diem |
| 08/15/2018 | Travel Fee | Transxn Fees | 8.26 | IBA | |
| Comment: OTRS Domestic-Intl w-Air-Rail | | | | | |
| 08/20/2018 | Airline Flight | Com. Carrier | 233.00 | IBA | |
| 08/23/2018 | TDY Voucher Fee | Transxn Fees | 14.75 | IBA | |

Per Diem Allowances

Trip#: 1 Total Per Diem Allowances: .00

| Date | Rate | Ldg Cost | Ldg Allowed | M&IE Cost | M&IE Allowed | B L D Conf% |
|------------|--------------|----------|-------------|-----------|--------------|-------------|
| 08/20/2018 | 93.00/ 51.00 | 0.00 | 0.00 | 0.00 | 0.00 | |

Account Summary for the Selected Trip

| | | | |
|--------------------------------|-------------------|----------------|--------|
| Org: | Label: 5944702 | Acct Code: | 256.01 |
| SBA_HQ_201010_ADMINISTRATOR | | | |
| Expense Category: Com. Carrier | Fiscal Year: 2018 | Amount: 233.00 | |
| Expense Category: Transxn Fees | Fiscal Year: 2018 | Amount: 23.01 | |
| | Total: | | 256.01 |

Payment Detail Information

| Organization | Label | Accounting String | Payment Method | Amount |
|-----------------------------|---------|-------------------|----------------|--------|
| SBA_HQ_201010_ADMINISTRATOR | 5944702 | | IBA | 256.01 |

Totals by Label

| | | | |
|-----------------------------|---------|--|--------|
| SBA_HQ_201010_ADMINISTRATOR | 5944702 | | 256.01 |
| Total | | | |

Totals by Payment Method

IBA Total 256.01

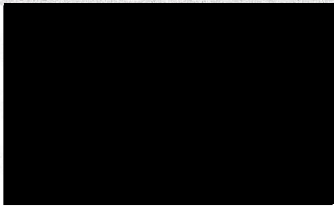
Receipt Checklist

| Date | Description | Cost |
|----------|--------------------|----------|
| 08/15/18 | Travel Fee | \$8.26 |
| 08/20/18 | AIR Airline Flight | \$233.00 |
| 08/23/18 | TDY Voucher Fee | \$14.75 |

Audits

| Audit Name | Result | Reason |
|------------|--------|--------|
|------------|--------|--------|

Document History 10/02/2018 VCH1: VCH026763**Copyright 1989-2009 Concur Government Edition: Concur Inc. MCMAHON, LINDA E. 000739342**

| STATUS | DATE | TIME | SIGNATURE NAME | REASON |
|----------------|------------|------------|--|--------|
| CREATED | 08/23/2018 | 10:20AMEST |  | |
| SIGNED | 08/23/2018 | 1:03PMEST | | |
| AUDIT PASS | 08/24/2018 | 5:16AMMST | | |
| APPROVED | 08/24/2018 | 5:55AMEST | | |
| PENDING | 08/24/2018 | 5:55AMEST | | |
| FUNDS RESERVED | 08/24/2018 | 6:17AMEST | | |
| PAID | 08/27/2018 | 6:59AMEST | | |

I certify that the electronic signatures listed above are valid and on file**SIGNED DATE****Document Signatures**

Traveler/Preparer Name: _____

Traveler/Preparer Signature: _____

Date: _____

Approver Name: _____

Approver Signature: _____

Date: _____

Document Header Information

| | | | |
|------------------------------|-----------------------------------|------------------|---|
| Document Type: | VCH1 | Document Name: | VCH027306 |
| Travel Authorization Number: | TANUM037098 | Trip Name: | ROUNDTABLE MEETINGS - OH & PA |
| TA Date: | 09/13/18 | Currency: | USD |
| Organization: | SBA_HQ_201010_ADMINISTRATOR | Current Status: | PAID |
| Purpose: | 2110 -TDY (Non-Disaster/Disaster) | Document Detail: | Attending roundtable meetings in Beaver, PA, Youngstown, OH, and Erie, PA. **TRAVELER WILL TRAVEL FROM PENNSYLVANIA VIA PRIVATE AIR AT NO COST TO THE AGENCY.** |
| Type Code: | 0000-Other | | |

Traveler Profile

| | | | |
|--------------------|--|------------------|-----------------------------|
| Name: | MCMAHON, LINDA E | ID: | 1001179752 |
| TID: | 000739342 | Organization: | SBA_HQ_201010_ADMINISTRATOR |
| Duty Station: | | Card: | CARD HOLDER |
| Office Address: | 409 3rd Street, S.W. Suite 7000 Washington, DC 20024 | EMAIL: | linda.mcmahon@sba.gov |
| Office Phone: | | Cell Phone: | |
| Home Address: | | Home Phone: | |
| Alternate Address: | | Alternate Phone: | |

Document Information

Trip Number: 1

Purpose: Attending roundtable meetings in Beaver, PA, Youngstown, OH, and Erie, PA. **TRAVELER WILL TRAVEL FROM PENNSYLVANIA VIA PRIVATE AIR AT NO COST TO THE AGENCY.**

Itinerary Locations

| From | To | Itinerary Location | Purpose | Per Diem Rates |
|----------|----------|--------------------|-----------------------------------|----------------|
| 08/29/18 | 08/30/18 | YOUNGSTOWN, OH | 2110 -TDY (Non-Disaster/Disaster) | 93.00 / 51.00 |

Document Totals

| | |
|----------------------------|--------|
| Total Expenses: | 466.89 |
| Reimbursable Expenses: | 466.89 |
| Non-Reimbursable Expenses: | .00 |
| Advance Applied: | .00 |
| Net to Traveler: | 321.05 |
| Net to Government: | .00 |
| Pay to Charge Card: | 145.84 |

Document Totals by Expense Category

| Expense Category | Cost | Advance Amount |
|------------------|--------|----------------|
| Adjustments | 15.65 | .00 |
| Com. Carrier | 260.20 | .00 |
| Lodging | 107.18 | .00 |
| M&IE-PerDiem | 60.85 | .00 |
| Transxn Fees | 23.01 | .00 |
| Total Expenses: | 466.89 | .00 |

Trip 1 Details**Reservations Summary**

| Reservation Type | Vendor | Ticket# | Location | Cost |
|------------------|--------|---------|----------|------|
|------------------|--------|---------|----------|------|

Trip Itinerary

From: DCA-Washington, DC (USA) (National Apt) TO: PIT-Pittsburgh, PA (USA) (Greater Pittsb

Air

Wednesday August 29, 2018

DCA-Washington, DC (USA) to PIT-Pittsburgh, PA (USA)

Aug 29 American Airlines 4231
Washington, DC (USA) (National Apt) 08/29/2018 1:14PM
Confirmation Number: RXBUAI

Duration: 1 Hour 16 Minutes Nonstop
Pittsburgh, PA (USA) (Greater Pittsburgh 08/29/2018 2:30PM

Flight Information
Distance 204 miles
No Seat Assigned

Emissions 108.1 lbs of CO2
Cost 260.20 USD

Expenses

| Trip#: 1 | | Total Non-Per Diem Expenses: | 313.04 | Total Per Diem Expenses: | 153.85 |
|---|-----------------|------------------------------|--------|--------------------------|----------|
| Date | Description | Category | Cost | Pay Method | Per Diem |
| 08/24/2018 | Travel Fee | Transxn Fees | 8.26 | IBA | |
| Comment: OTRS Domestic-Intl w-Air-Rail | | | | | |
| 08/29/2018 | Airline Flight | Com. Carrier | 260.20 | CASH/OTHER | |
| 08/29/2018 | Lodging | Lodging | 93.00 | IBA | * |
| 08/29/2018 | Lodging Tax | Lodging | 14.18 | IBA | |
| 08/29/2018 | M&IE | M&IE-PerDiem | 38.25 | CASH/OTHER | * |
| 08/30/2018 | Adjustments | Adjustments | 15.65 | IBA | |
| Comment: Room service charges deducted from per diem and reimbursed to travel card. | | | | | |
| 08/30/2018 | M&IE | M&IE-PerDiem | 22.60 | CASH/OTHER | * |
| Comment: Room service charges deducted from per diem and reimbursed to travel card. | | | | | |
| 09/13/2018 | TDY Voucher Fee | Transxn Fees | 14.75 | IBA | |

Per Diem Allowances

Trip#: 1 Total Per Diem Allowances: 153.85

| Date | Rate | Ldg Cost | Ldg Allowed | M&IE Cost | M&IE Allowed | B L D Conf% |
|------------|--------------|----------|-------------|-----------|--------------|-------------|
| 08/29/2018 | 93.00/ 51.00 | 93.00 | 93.00 | 38.25 | 38.25 | |
| 08/30/2018 | 93.00/ 51.00 | 0.00 | 0.00 | 22.60 | 22.60 | |

Account Summary for the Selected Trip

| | | | |
|--------------------------------|-------------------|----------------|--------|
| Org: | Label: 5944702 | Acct Code: | 466.89 |
| SBA_HQ_201010_ADMINISTRATOR | | | |
| Expense Category: Adjustments | Fiscal Year: 2018 | Amount: 15.65 | |
| Expense Category: Com. Carrier | Fiscal Year: 2018 | Amount: 260.20 | |
| Expense Category: Lodging | Fiscal Year: 2018 | Amount: 107.18 | |
| Expense Category: M&IE-PerDiem | Fiscal Year: 2018 | Amount: 60.85 | |
| Expense Category: Transxn Fees | Fiscal Year: 2018 | Amount: 23.01 | |
| Total: | | | 466.89 |

Payment Detail Information

| Organization | Label | Accounting String | Payment | Amount |
|--------------|-------|-------------------|---------|--------|
|--------------|-------|-------------------|---------|--------|

SBA_HQ_201010_ADMINISTRATOR5944702

BA

145.84

Totals by Label

SBA_HQ_201010_ADMINISTRATOR5944702

466.89

Total

Totals by Payment Method

CASH/OTHER 321.05

Total

IBA Total 145.84

Attachments

Attachments Exist

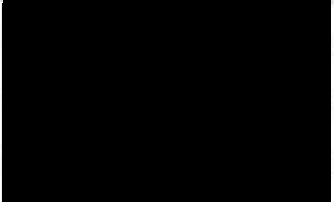
Receipt Checklist

| Date | Description | Cost |
|----------|--------------------|----------|
| 08/24/18 | Travel Fee | \$8.26 |
| 08/29/18 | AIR Airline Flight | \$260.20 |
| 08/29/18 | Lodging | \$93.00 |
| 08/29/18 | Lodging Tax | \$14.18 |
| 08/29/18 | M&IE | \$38.25 |
| 08/30/18 | Adjustments | \$15.65 |
| 08/30/18 | M&IE | \$22.60 |
| 09/13/18 | TDY Voucher Fee | \$14.75 |

Audits

| Audit Name | Result | Reason |
|------------|--------|--------|
|------------|--------|--------|

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| STATUS | DATE | TIME | SIGNATURE NAME | REASON |
|----------------|------------|-----------|--|--------|
| CREATED | 09/13/2018 | 2:15PMEST |  | |
| SIGNED | 09/14/2018 | 8:29AMEST | | |
| AUDIT PASS | 09/14/2018 | 1:17PMMST | | |
| APPROVED | 09/14/2018 | 1:39PMEST | | |
| PENDING | 09/14/2018 | 1:39PMEST | | |
| FUNDS RESERVED | 09/14/2018 | 1:57PMEST | | |
| PAID | 09/18/2018 | 8:28AMEST | | |

I certify that the electronic signatures listed above are valid and on file**SIGNED DATE****Document Signatures**

Traveler/Preparer Name:

Traveler/Preparer Signature:

Date:

Approver Name:

Approver Signature:

Date:



U.S. SMALL BUSINESS ADMINISTRATION
WASHINGTON, DC 20416

OFFICE OF THE DESIGNATED AGENCY ETHICS OFFICIAL

DATE: December 4, 2017

TO: The Administrator, the Deputy Administrator, and the Chief of Staff

FROM: Robert L. Gangwere
Designated Agency Ethics Official

RE: Allocation and reimbursement of costs associated with the Administrator's and the Deputy Administrator's "mixed travel."

Enclosed is a brief outline of the basic rules relating to the allocation of costs associated with the Administrator's and the Deputy Administrator's "mixed travel" (e.g. a trip involving both partisan political activities and official activities).

When considering the payment of travel related costs incurred by the Administrator or Deputy Administrator on behalf of candidates for public office or partisan political organizations, three principles always govern:

- 1) Appropriated funds may be spent only for the purposes for which they have been appropriated. See 31 USC § 1301; 52 Comp. Gen. 504 (1972); 50 Comp. Gen. 534 (1971). Accordingly, funds appropriated for official SBA functions may be used for travel expenses only if the travel is reasonably related to an official SBA purpose. Official funds may not, therefore, be used to pay the expenses related to a partisan political trip or function. See 5 CFR § 734.503(a) (2017).
- 2) In general, official activities, including travel, should be paid for only from funds appropriated for such purposes, unless Congress has authorized the financial support of those official activities by other means. An example would be payments for official travel from non-Federal sources pursuant to 31 USC § 1353 and 41 CFR Chapter 304 (2015). This rule prevents the unauthorized augmentation of agency appropriations.
- 3) Pursuant to Federal election laws, all travel performed on behalf of a candidate running for president or vice-president of the United States must be paid for by the presidential campaign. See 11 CFR § 9034.7 (2017).

There are two "formulas" for the allocation and reimbursement of costs associated with Federal campaign activity conducted, while on official travel, by the Administrator or Deputy Administrator (both of whom are Presidential Appointees -- Senate Confirmed or "PAS" officials). One is called the "hard-time formula," which is required for partisan political

activity (excluding presidential campaign activity) conducted while on official travel. See 5 CFR § 734.503(c) (2017). The other one is referred to as the "hypothetical trip formula," which is exclusively required for presidential and vice-presidential campaign activity. See 11 CFR § 9034.7(b)(2) (2017).

Hard-time formula ~

This formula is to be used to apportion the costs of "mixed travel" in all situations, *except presidential and vice presidential campaign activity*. Prorating the cost of travel for the Administrator's or the Deputy Administrator's mixed travel trips involve determining the "total activity time."

Total activity time is the amount of time actually spent by the Administrator or the Deputy in "meetings, receptions, rallies and similar activities. Time spent in actual travel, private study, or rest and recreation is not included in the computation of 'total activity time.' The proration of the cost then is determined based on how the 'total activity time' was spent." See 5 CFR § 734.503(c) (2017).

The actual formula is as follows:

| <i>Formula</i> | <i>Example</i> |
|--|-----------------|
| Time spent in official meetings, receptions, etc. <i>plus</i> | 20 hours |
| Time spent in political meetings, receptions, rallies, etc. <i>equals</i> | <u>8 hours</u> |
| Total activity time | 28 hours |
| Time spent in official activity <i>divided by</i> | 20 hours |
| Total activity time <i>equals</i> | <u>28 hours</u> |
| Percentage of trip that was official | 71% |
| Time spent in political activity <i>divided by</i> | 8 hours |
| Total activity time <i>equals</i> | <u>28 hours</u> |
| Percentage of trip that was political | 29% |
| Percentage of trip that was political <i>multiplied by</i> | 29% |
| Total amount that would be reimbursed to the Government if all of the travel was political <i>equals</i> | <u>\$1,500</u> |
| Total amount paid by the political campaign or organization | \$435 |

This hard-time allocation method has to be applied to all of the relevant costs of mixed travel. "Expenses that are associated specifically with a political activity and not with any official activity must be treated as political," and visa versa. The determination of the proper amount of allocation must be based, however, on the facts and circumstances involved.

In allocating costs of travel, other than airfare, the hard-time allocation formula should be

applied to the Government maximum for that type of expenditure. In other words, if the PAS is on a mixed travel trip and is only entitled to \$70 per diem for food, and the trip is 50% official and 50% political, the Government share of the per diem cost would be 50% of \$70 and not 50% of the actual amount spent.

Finally, if the percentage of the activity of a mixed travel trip devoted to either official or political activity is minor (*e.g.* less than 3%), then the entire trip should be treated as if it was wholly of the type represented by the remaining 97%.

Hypothetical trip formula ~

This formula is to be used exclusively to apportion the costs of "mixed travel" in situations involving political activity on behalf of a presidential campaign (including activities with a vice presidential candidate). Prorating the cost of travel for these mixed travel trips involve calculating what the trip would have cost from the point of origin to the first campaign-related "stop," and from that first stop through each subsequent campaign-related stop and back to the point of origin. A "stop" is defined as a city or town where a train stops or a plane lands, as reflected on a travel itinerary. If *any* presidential campaign-related activity, other than incidental contacts, is conducted at a particular stop, the entire stop shall be presidential campaign-related. For each trip a travel itinerary must be prepared. The itinerary must show the time of arrival and departure, the type of event held, and the specific involvement of the PAS.

Presidential or vice presidential campaign-related activity includes expressly advocating or assisting in the election or defeat of a presidential or vice presidential candidate. "Other factors, including the setting, timing and statements or expressions of the purpose of the event and the substance of the remarks or speech made, will also be considered in determining whether a stop is campaign-related." See 11 CFR § 9034.7(b)(2)(2017).

Please note, however, that the host of the event should always pay event costs, as opposed to travel-related costs. For example, during a trip involving presidential campaign activity and other types of partisan political activity, even though the presidential campaign will pay for all of the "travel costs" for that stop, the campaign should not pay non-travel related costs for the non-presidential campaign events during the stop.

Some examples are as follows:

1. If a trip is entirely presidential campaign-related, the campaign committee shall pay for the total travel costs of the trip.
2. If it is a mixed travel trip with only one stop, the presidential campaign shall pay the total travel costs of the trip.
3. If a trip includes two stops, and only one stop is campaign-related, the presidential campaign will pay an amount equal to a hypothetical trip from the point of origin to

the campaign-related stop and back to the point of origin.

4. If a trip includes three stops, one is official, one is presidential campaign-related, and one is related to non-presidential partisan political activity, the presidential campaign will pay an amount equal to a hypothetical trip from the point of origin to the presidential campaign-related stop and back to the point of origin.

If you have any questions concerning this matter, or need assistance in applying these rules to specific trips, please feel free to contact me at (816) 426-4844.