

**FACTUAL BASIS FOR THE PLEA
OF ANN M. COPLAND**

This statement is submitted to provide a factual basis for my plea of guilty to the conspiracy charge filed against me.

All dates in this Factual Basis are “on or about” the specific date stated.

1. From 1979 to 2008, defendant ANN COPLAND worked on the staff of a United States Senator. From 2002 through 2004, defendant COPLAND worked as an assistant on legislative and administrative matters. In particular, defendant COPLAND worked on matters involving Native American Indian Tribes.
2. From 2002 through 2004, defendant COPLAND was lobbied by several Washington, D.C. based lobbyists working at Firm B, including Jack Abramoff, Todd Boulanger, and Kevin Ring.
3. Abramoff, Boulanger, Ring, and others working at Firm B had as a lobbying client a Native American Tribe located in Mississippi (“Mississippi Tribe”). The Mississippi Tribe was a constituent of the U.S. Senator for whom defendant COPLAND worked.
4. From March 2002 through May 2004, Abramoff, Boulanger, Ring, and others provided a stream of things to defendant COPLAND - including tickets to concerts, sports, and other entertainment events, and meals and drinks at expensive D.C. area restaurants - with an approximate total value of more than \$25,000 but less than \$30,000.
5. During the same period, from March 2002 through May 2004, defendant COPLAND took and agreed to take a variety of official actions at the request of Abramoff, Boulanger, Ring, and others working with them. Defendant COPLAND took these official actions based in part on the fact that she was receiving and wanted to continue

receiving things of value from Abramoff, Boulanger, and Ring. Defendant COPLAND understood that by taking official action which was beneficial to the lobbyists and their clients, she would continue to receive and enjoy these things of value. Defendant COPLAND also understood that the lobbyists were providing her things of value in order to influence her in the performance of her official actions.

6. As part of the course of conduct described above, from March 2002 through May 2004, defendant COPLAND solicited and received numerous things of value, and took and agreed to take multiple official acts, including, but not limited to, the following:
7. On March 8, 2002, defendant COPLAND emailed Ring a request for tickets to a variety of concerts and sporting events, which read as follows:

McCartney: 2 or 4

Ice: 2, 3, 4 or 5

And, any of the following:

Floor tickets for the Circus any day except Saturday, March 23 at 7:30. -
2, 4 or 6 tickets[.] I'm only interested in the floor for that event, if
available.

NSYNC - anything from 3 to 6 tickets

Hockey: Saturday, March 30: 5 to 7 tickets - any floor.

Greenday [*sic*]: 3 to 6 tickets.

Ring forwarded Staffer E's email to Abramoff and BOULANGER, telling them "Wow.... We already told her she was fine on McCartney, ice skating, and Green Day - although we need to let her know how many tix she can have for each. Also, please review the other requests and let me know what we can do there." BOULANGER responded to Ring and Abramoff, "Ann should get everything she wants," to which Abramoff replied, "She'll get everything she wants."

8. On March 11, 2002, Ring emailed defendant COPLAND a request to have the U.S. Senator for whom COPLAND worked co-sign a letter to the Small Business Administration on behalf of Mississippi Tribe.
9. On June 5, 2002, Ring emailed Abramoff and Boulanger telling them, "Ann Copland was in [the] suite tonight. She loves us and [the Mississippi Tribe]. Kept telling people how good we are."
10. On August 19, 2002, Ring emailed Abramoff, Boulanger, and others at Firm B, telling them:

Below is Ann Copland's request for tickets:

- (1) MCI -- Sun, Sept. 29, 2pm SPIRIT OF AMERICA - 5 or more tickets
- (2) MCI -- Mon, Mar 24, 2003 Figure Skating Championship - from 2-5 tickets
- (3) Orioles for either Sunday, Sept. 8 or Sunday, Sept. 22 -- the whole suite, if available
- (4) Redskins - Sept. 16 (2 or 4)
- (5) Redskins - October 13 (4 or more).

Abramoff informed Boulanger, Ring, and others that all of defendant COPLAND's requests were approved.

11. On December 9, 2002, Boulanger emailed defendant COPLAND and one of her colleagues requesting that they ask a different staffer to facilitate, among other things, an additional \$2 million to an existing appropriation for the Mississippi Tribe.
12. On February 11, 2003, defendant COPLAND emailed Boulanger asking if she could have the entire box suite at Camden Yards in Baltimore for a baseball game in June. Boulanger responded, "I'll make it happen. BTW, did [another staffer] pull out the [Mississippi Tribe's] IHS language [from an appropriation's bill]?" Defendant COPLAND replied, "[the other staffer] said this morning that he'd triple check. I saw

the notes, and there was a defiant note to take care of it. On the other thing: you are awesome.”

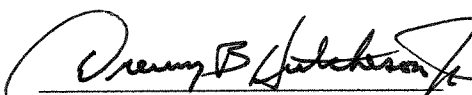
13. On February 27, 2003, defendant COPLAND emailed Boulanger that she was taking her “special guests” to an upcoming Liza Minelli concert and asking if the box suite would have refreshments. In response, Boulanger asked for COPLAND’s thoughts on a Homeland Security appropriation which would benefit a client who was seeking Congressional funding for a television network that would cater to emergency first responders.
14. On February 28, 2003, defendant COPLAND emailed Boulanger and Ring telling them, “Kevin emailed me about skating days - says the 30th isn’t available. I’m so sad.” Ring forwarded her email to Abramoff and Boulanger explaining that the suite in the MCI Center was bought out on the 30th and telling them, “...I don’t know that we have any recourse besides maybe buying tickets in the arena??” Abramoff responded to Boulanger, Ring, and his administrative assistant, telling them, “Get her tickets in the arena!”
15. On March 9, 2003, Ring emailed defendant COPLAND and Boulanger the Mississippi Tribe’s appropriations requests for 2004, to which defendant COPLAND replied, “we’ll need the details before the end of the month... We should meet with our staff about these.”
16. On April 7, 2003, defendant COPLAND emailed Ring asking, “So, are you guys busy on Thursday? [A guest] will be in town and I’d love to have a Signatures lunch with you, Todd [and others]. Do-able?” Ring attended the lunch and paid the \$177.90 bill.

17. On May 4, 2003, defendant COPLAND emailed Boulanger that there was no food in the MCI Center box suite for an ice skating event, telling him, "Hey. I've got no food and party of fourteen and no food. I'm freaking out here. Kevin [Ring] said I was all set. I [am] ordering and I guess [I']ll pay[.] [H]elp if you can." Boulanger responded in part, "Ann, if you pay keep the receipt and I'll get you reimbursed."
18. On June 10, 2003, defendant COPLAND used the Camden Yards box suite to throw a party during an Orioles game. While at Camden Yards, defendant COPLAND emailed Boulanger to complain about the suite's food, telling him, "Ackkk. Only beer and no hebrew national hot dogs."
19. On July 11, 2003, defendant COPLAND emailed Boulanger asking whether the lobbyists had tickets to the Kennedy Center because she "really" wanted four tickets to an event in April or May, 2004. Defendant COPLAND received the tickets and attended the event in May, 2004.

The preceding statement is a summary, made for the purpose of providing the Court with a factual basis for my guilty plea to the conspiracy charge against me. It does not include all of the facts known to me concerning criminal activity in which I and/or others engaged. I make this statement knowingly and voluntarily and because I am in fact guilty of the crime charged.

DATE: 2-12-2009


ANN M. COPLAND


Drewry B. Hutcheson, Jr., Esq.
Counsel for Defendant