

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA : Criminal Number:
 :
 v. : VIOLATION:
 : 18 U.S.C. § 371
 ANN M. COPLAND : (Conspiracy)
 :
 Defendant. :
 :

INFORMATION

The United States charges that:

RECEIVED
FEB 19 2009
NANCY MAYER WHITTINGTON, CLERK
U.S. DISTRICT COURT

COUNT ONE

18 U.S.C. § 371 – Conspiracy to Commit Honest Services Wire Fraud

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

Introduction

Unless otherwise specified, at all times material to this Information:

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. There were statutes and rules which governed the conduct of Members and employees of the U.S. Senate. These statutes and rules prohibited, among other things, the solicitation of gifts by Senate employees from anyone seeking official action from, doing business with, or whose interests may be substantially affected by a Senate employee's official duties. Defendant COPLAND understood that she was prohibited from soliciting gifts from lobbyists and from the Mississippi Tribe.

The Conspiracy

5. From March 2002 through May 2004, in the District of Columbia and elsewhere, the defendant,

ANN M. COPLAND,

together with Abramoff, Boulanger, Ring and others, did knowingly combine, conspire, confederate and agree to commit an offense against the United States, to wit, to devise a scheme and artifice to defraud and deprive the U.S. Senate and the people of the United States of their right to defendant COPLAND's honest services performed free from deceit, fraud, concealment, bias, conflict of interest, self enrichment and self dealing, and to use the interstate wires in furtherance of the conspiracy, in that defendant COPLAND did corruptly solicit and receive things of value offered and provided by Abramoff, Boulanger, and Ring, which things of value were concealed from the U.S. Senate, and which things of value were solicited and received by defendant COPLAND with the intent to be influenced, induced, and rewarded for official action favorable to Abramoff, Boulanger, Ring, and their lobbying clients.

Purposes of the Conspiracy

6. It was a purpose of the conspiracy for defendant COPLAND to be unjustly enriched by her receipt of things of value, and to conceal these gifts from the U.S. Senate and the people of the United States.
7. It was a further purpose of the conspiracy for Abramoff, Boulanger, Ring and others to obtain benefits, financial and otherwise, for themselves and their clients through corrupt means, including by offering and providing things of value to defendant COPLAND to influence, to induce, to reward, and in exchange for official actions by defendant COPLAND.

Manner and Means of the Conspiracy

8. The conspiracy was carried out through the following manner and means:
 - a. Beginning in 1999 and continuing until at least early 2004, Abramoff, Boulanger, Ring and other lobbyists working with them established contacts with federal legislative branch and executive branch public officials who could use their influence and positions to perform official actions that would assist the lobbyists to promote their clients' interests. As part of this process, Abramoff, Boulanger, and Ring established contact with defendant COPLAND.
 - b. Abramoff, Boulanger, and Ring offered and provided a stream of things of value to defendant COPLAND in an effort to reward her for actions she had taken, to influence her in her official actions, and to make her more receptive to requests for official actions in the future. The things of value defendant COPLAND solicited and received from Abramoff, Boulanger, and Ring included, but were

not limited to, thousands of dollars worth of tickets to professional sporting events, music concerts, and other events; and meals and drinks at Washington, D.C. area restaurants and bars.

- c. Being influenced, induced, and rewarded by these things of value, defendant COPLAND performed various official actions, including but not limited to attempting to persuade other legislative and executive branch officials to take or abstain from taking official action, and assistance with inserting, protecting, removing, and preventing legislative amendments and appropriations.

Overt Acts

9. In furtherance of the conspiracy and in order to accomplish its objects, defendant COPLAND, Abramoff, Boulanger, Ring and others committed multiple overt acts, including, but not limited to, the following:
10. 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.

11. On March 11, 2002, Ring forwarded defendant COPLAND'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.”

12. On March 11, 2002, Boulanger responded to Ring and Abramoff, “Ann [COPLAND] should get everything she wants.”

13. On March 11, 2002, Abramoff replied to Boulanger, “She’ll get everything she wants.”

(All in violation of Title 18, United States Code, Section 371.)

Dated: 2/19/09

WILLIAM M. WELCH II
Chief, Public Integrity Section

Peter C. Sprung
M. Kendall Day
Peter C. Sprung
Trial Attorneys
Criminal Division
U.S. Department of Justice