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FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

RAD REFERRAL: 07L-05
DATE OF REFERRAL: February 28, 2007
DATE ACTIVATED: March 14, 2007
EXPIRATION OF SOL: January 10, 2011

SOURCE:

INTERNALLY GENERATED

RESPONDENTS:

Women's Campaign Fund and
Allison Thompson, in her official
capacity as treasurer
Monica J. Cash

RELEVANT STATUTES
AND REGULATIONS:

2 U.S.C. § 432(b)(3)
2 U.S.C. § 432(c)(5)
2 U.S.C. § 434(b)
11 C.F.R. § 102.15
11 C.F.R. § 104.3

INTERNAL REPORTS CHECKED:

Disclosure Reports
RAD Referral Materials

FEDERAL AGENCIES CHECKED:

I. INTRODUCTION

The Reports Analysis Division ("RAD") referred the Women's Campaign Fund and Allison Thompson, in her official capacity as treasurer ("WCF"), to this Office for the apparent unauthorized disbursement of WCF funds totaling \$83,050 by the committee's former office manager, Monica J. Cash.¹ In addition, the referral includes a \$51,147.03 discrepancy between

1 the ending cash-on-hand balance reported by the WCF in its 2002 Year-End Report and the
2 beginning cash-on-hand balance reported by the WCF in its next-filed report, the 2003 July
3 Quarterly Report.

4 Based on the available information, _____

5 _____] we recommend that the Commission
6 open a Matter Under Review and find reason to believe that the Women's Campaign Fund and
7 Allison Thompson, in her official capacity as treasurer, violated 2 U.S.C. § 434(b)(1), (4), and
8 (6)(B)(v), and 11 C.F.R. § 104.3(a)(1) and (b), by failing to accurately keep an account of and
9 report cash-on-hand balances and to accurately report disbursements in the WFC's disclosure
10 reports. We also recommend that the Commission find reason to believe that the embezzler,
11 Monica J. Cash, knowingly and willfully violated 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15
12 by commingling WCF funds with her personal funds. Further, we recommend that the
13 Commission _____

14 _____] in order to determine what, if any,
15 internal controls the Committee had in place at the time of the embezzlement.

16 **II. FACTUAL SUMMARY**

17 The WCF is a multicandidate political committee, as defined by 2 U.S.C. § 441a(a)(4),
18 that has filed disclosure reports with the Commission since 1994. Monica Cash was employed as
19 WCF's office manager from December 2000 to January 14, 2004. Cash was purportedly
20 responsible for various aspects of the WCF's day-to-day operations, including tracking incoming
21 contributions and donor information, tracking disbursements and operating expenditures, and

1 filing financial disclosure reports with the Commission and various state election offices on
2 behalf of the WCF's treasurer, Allison Thompson. Attachment 1 at ¶ 6. According to Cash, she
3 was also responsible for making deposits into WCF bank accounts, cutting checks to pay
4 vendors, and reconciling the WCF's bank records. *Id.*

5 Between 2001 and 2003, Cash reportedly drafted approximately 58 WCF checks totaling
6 \$83,050 payable to "Monica Cash" or "Cash," and then forged signatures of WCF employees
7 with signatory authority on the checks.³ *Id.* at ¶ 8. Cash then either presented the checks for
8 cash, or deposited the checks into her personal checking account. *Id.* at ¶ 9. In order to avoid
9 detection, Cash concealed these unauthorized disbursements by deleting the transactions from
10 the internal WCF database that was used to prepare the committee's disclosure reports. *Id.* at ¶
11 10. As a result of Cash's concealment of the unauthorized disbursements, it appears that the
12 WCF inaccurately disclosed its disbursements in nine separate disclosure reports that it filed
13 from 2002 through 2004. *Id.* at ¶¶ 14 and 15.

14 The embezzlement first came to the Commission's attention on April 13, 2006, when
15 RAD called WCF's treasurer, Allison Thompson, to follow up on a Request for Additional
16 Information ("RFAI") that it had previously sent to the WCF regarding a discrepancy in the
17 cash-on-hand balances that the WCF reported in its Amended 2002 Year-End Report and its
18 Amended 2003 July Quarterly Report. Specifically, on January 10, 2006, the WCF had filed an
19 Amended 2003 July Quarterly Report disclosing an opening cash-on-hand balance of

³ Cash did not have signatory authority on any of the checking accounts maintained by the WCF. Attachment 1 at ¶ 7.

1 \$203,278.19. However, the WCF's amended 2002 Year-End Report, filed January 14, 2004,
2 disclosed an ending cash-on-hand balance of \$254,425.22, thus creating a discrepancy of
3 \$51,147.03. Therefore, on March 3, 2006, RAD sent a RFAI to the WCF referencing the
4 Amended 2003 July Quarterly Report and requesting clarification of the opening cash-on-hand
5 discrepancy disclosed in the report.

6 In its initial response to the RFAI, the WCP stated that it was "doing a full review of the
7 reports and will submit an amended Year-End Report to reflect the correct cash balance."
8 However, after the WCP failed to correct the discrepancy, RAD followed up with the committee
9 and Thompson informed RAD that the WCF was completing an internal audit to investigate
10 "employee fraud," and that all disclosure reports would have to be amended upon completion of
11 the fraud investigation.

12
13
14 As of this date, the WCF has not
15 amended its disclosure reports to reveal disbursements related to the embezzlement or to correct
16 the discrepancy in the cash-on-hand balances.⁵

17 On March 16, 2007, Cash was indicted for Bank Fraud, False Statements, and Uttering
18 and Possessing a Forged Security as a result of her embezzlement of WCP funds. On April 27,
19 2007, a plea agreement signed by Cash was filed with the United States District Court for the
20 District of Columbia pursuant to the indictment. In this plea agreement, Cash agrees to enter a
21 guilty plea to the charge of Uttering and Possessing a Forged Security, in violation of 18 U.S.C.

⁵ On June 6, 2007, RAD informed this Office that the WCF had contacted RAD and requested a meeting with an analyst regarding the amendment of its disclosure reports to accurately its disbursements. RAD, after consultation with OGC, has agreed to this meeting.

1 § 513(a) and to provide full restitution to the WCF.⁶ Cash is scheduled to be sentenced for this
2 offense on August 10, 2007.

3 **III. LEGAL ANALYSIS**

4 **A. Liability of WCF**

5 Under the Act, the WCF, through its treasurer, is required to accurately keep an account
6 of and report cash-on-hand balances and its disbursements. *See* 2 U.S.C. §§ 434(b)(1), (4) and
7 (6)(B)(v); and 11 C.F.R. §§ 104.3(a)(1) and (b). Committee treasurers are responsible for the
8 timely and complete filing of disclosure reports and for the accuracy of the information
9 contained therein. *See* 11 C.F.R. § 104.14(d). When considering committee liability for
10 inaccurate reporting due to embezzlement, the Commission considers whether the committee
11 implemented internal control procedures over committee finances (*e.g.*, regular audits, control
12 procedures over receipts and disbursements, segregated duties, or periodic review of finances),
13 as well as the committee's efforts to notify the Commission and other law enforcement
14 authorities of the embezzlement and amend any related inaccurate disclosure reports. *See*
15 Statement of Policy; Safe Harbor for Misreporting Due to Embezzlement, 72 Fed. Reg. 16,695
16 (April 5, 2007) (establishing safe harbor from civil penalties for committees that, *inter alia*,
17 implement certain minimal safeguards in the form of internal financial controls to prevent
18 misappropriations and associated misreporting). *See also* MUR 5872 (Jane Hague for
19 Congress); MUR 5721 (Lockheed Martin Employees PAC); MUR 5811 (Doggett for Congress);
20 MUR 5812 (Ohio State Medical Association PAC); MUR 5813 (Georgia Medical PAC).

21 In this matter, the discrepancy between the cash-on-hand balances that WCF reported in
22 its 2002 Year-End Report and its 2003 July Quarterly Report indicates that it failed to accurately

⁶ In exchange for Cash's agreement, the United States dismissed one charge of Bank Fraud, a violation of 18 U.S.C. § 1344, and eight counts of False Statements, a violation of 18 U.S.C. § 1001.

1 report the balance in one or both of those reports. Further, the available information establishes
2 that that WCF failed to disclose at least \$83,050 in disbursements from 2001 through 2004, due
3 to the embezzlement of WCF funds by Monica J. Cash.⁷ We have little specific information
4 regarding the internal control procedures, if any, that WCF had over its finances. However, the
5 available information regarding Cash's duties as office manager, *see pp. 2-3 infra*, raises
6 questions as to whether the committee properly segregated the financial duties. Further, the fact
7 that Cash was able to make 58 unauthorized disbursements over a two-year period without
8 detection indicates that the WCF may not have had in place minimal internal controls.

9 In addition, although the available information indicates that the WCF knew about the
10 embezzlement at least as early at April 2006, the WCF's treasurer has only recently contacted
11 RAD to inquire about filing correcting amendments to its disclosure reports, *see note 5 supra*,
12 and to date, has filed no such amendments. Therefore, it appears that the Committee may be
13 responsible for the reporting violations that resulted from the embezzlement.

14 Accordingly, we recommend that the Commission find reason to believe that the
15 Women's Campaign Fund and Allison Thompson, in her official capacity as treasurer, violated 2
16 U.S.C. § 434(b)(1), (4), and (6)(B)(v); and 11 C.F.R. § 104.3(a)(1) and (b), by failing to
17 accurately keep an account of and report cash-on-hand balances, and for failing to disclose at
18 least \$83,050 in disbursements in its disclosure reports.

⁷ According to the Factual Basis for Plea, there is a slight discrepancy in the amount reportedly embezzled by Cash (\$83,050), and the amount that the WCF failed to include in its disclosure reports as a result of Cash's efforts to conceal her embezzlement (\$84,910). *See Attachment 1 at ¶¶ 14 and 15; see also note 4 supra.*

B. Liability of Monica J. Cash

The Act prohibits the commingling of committee Federal funds with "the personal funds of any individual."⁸ 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15. In this matter, Cash improperly commingled WCF funds with her personal funds, in violation of 2 U.S.C. § 432(b)(3), by writing checks to herself from WCF accounts without authorization, and then cashing or depositing the checks into her personal bank account. Cash disguised the activity by deleting the disbursements from the database used by WCF to track disbursements for the purpose of filing its disclosure reports. As discussed previously, Cash pled guilty to criminal charges related to the embezzlement scheme, and is scheduled to be sentenced on August 10, 2007.

Accordingly, we recommend that the Commission find reason to believe that Monica J. Cash knowingly and willfully violated 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15 by commingling WCF funds with her personal funds.

⁸ The Commission has previously made findings that respondents violated 2 U.S.C. § 432(b)(3) in matters where individuals misappropriated committee funds by making unauthorized disbursements to themselves. *See, e.g.,* MUR 5814 (Lamutt), MUR 5610 (Dole), MUR 5811 (Doggett), MUR 5721 (Lockheed) and MUR 5872 (Hague). Further, to establish a knowing and willful violation, there must be knowledge that one is violating the law. *See FEC v. John A. Dramesi for Congress Comm.*, 640 F. Supp. 985, 987 (D. N.J. 1986). A knowing and willful violation may be established "by proof that the defendant acted deliberately and with knowledge that the representation was false." *US v. Hopkins*, 916 F.2d 207, 214 (5th Cir. 1990). An inference of a knowing and willful act may be drawn "from the defendant's elaborate scheme for disguising" his or her actions. *Id.* at 214-15.

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6 interrogatories and document subpoenas, as necessary. Accordingly, we recommend that the
7 Commission authorize the use of compulsory process, including the issuance of appropriate
8 interrogatories, document subpoenas, and deposition subpoenas, as necessary.
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18 **VI. RECOMMENDATIONS**

- 19 1. Open a MUR;
- 20 2. Find reason to believe that the Women's Campaign Fund and Allison Thompson,
21 in her official capacity as treasurer, violated 2 U.S.C. § 434(b)(1), (4), and
22 (6)(B)(v); and 11 C.F.R. § 104.3(a)(1) and (b);
23
- 24 3. Find reason to believe that Monica J. Cash knowingly and willfully violated
25 2 U.S.C. § 432(b)(3) and 11 C.F.R. § 102.15;
26
- 27 4. Approve the attached Factual and Legal Analyses;
28

- 1 5. _____
2 |
3
4 6. _____
5
6 7. Authorize the use of compulsory process in this matter, including the issuance of
7 appropriate interrogatories, document subpoenas, depositions subpoenas and
8 order, as necessary;
9
10 8. Approve the appropriate letters.

11
12
13 Thomasenia P. Duncan
14 General Counsel

15
16
17 Ann Marie Terzaken
18 Acting Associate General Counsel
19 for Enforcement
20

21
22 6-14-07
23 _____
24 Date

25
26
27 By: Kathleen M. Guith
28 Kathleen M. Guith
29 Assistant General Counsel
30

31
32
33 Wanda D. Brown by KMG
34 Wanda D. Brown
35 Attorney
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39
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Attachments:

1. Factual Basis for the Plea of Monica J. Cash in *United States v. Cash*, Crim No. 07-064(ESH) (D.D.C. filed April 27, 2007).

CR07-64

FILED

APR 27 2007

MONICA J. CASH, CLERK
U.S. DISTRICT COURT

ATTACHMENT A
FACTUAL BASIS FOR THE PLEA
OF MONICA J. CASH

This statement is submitted to provide a factual basis for my plea of guilty to the charge of Uttering and Possessing a Forged Security, in violation of Title 18, United States Code, Section 513(a), as set forth in Count 2 of an Indictment filed against me in this matter on March 16, 2007.

At all relevant times:

1. The Women's Campaign Fund ("WCF") was a political committee registered with the Federal Election Commission ("FEC"). WCF was dedicated to supporting "pro-choice" women seeking political office in state and federal elections. WCF's support came in the form of direct campaign contributions, fund raising efforts, media relations, and other political activities.
2. Defendant MONICA J. CASH was employed by WCF as its Office Manager from on or about December 18, 2000, through on or about January 14, 2004.
3. The FEC was an agency of the Executive Branch of the United States Government that administered and enforced the Federal Election Campaign Act, 2 U.S.C. §§ 431-455 ("FECA").
4. A political committee registered with the FEC that seeks to influence a federal election was required to have a treasurer who was required to file periodic reports with the FEC relating to the committee's financial activities. 2 U.S.C. §§ 432(a), 434(a), 434(b).
5. SunTrust Banks, Inc. ("SunTrust") was a financial institution with branch offices located in the District of Columbia and Maryland. Deposits into SunTrust's bank accounts were insured by the Federal Deposit Insurance Corporation ("FDIC").

Attachment 1
Page 1 of 7

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6. As Office Manager, CASH was responsible for all aspects of WCF's day-to-day operations, including, among other things: tracking incoming donor contributions, disbursements, and operating expenditures; entering donor information, contributions amounts, disbursements, and expenditures into WCF's internal database; filing financial disclosure reports with the FEC and numerous state election offices on behalf of WCF's treasurer; making deposits into WCF bank accounts; and cutting checks to pay vendors and cover operating expenses; reconciling WCF's bank records and financial statements; and preparing budget reports for the organization's treasurer.

7. Between in or around early 2001, and continuing through in or around early 2004, WCF maintained business checking accounts with SunTrust relating to WCF's fund-raising activities, affiliated Political Action Committee fund-raising activities, and non-profit, charitable contribution work. CASH did not have signatory authority on any of these business checking accounts.

8. From on or about July 30, 2001, and continuing through on or about December 26, 2003, in the District of Columbia and elsewhere, CASH embezzled approximately \$83,050 in cash from WCF by drafting approximately 58 WCF checks made payable to "Monica Cash" or "Cash." After drafting these WCF checks, CASH forged the signatures of WCF employees whom CASH believed had signatory authority on certain WCF checking accounts maintained at SunTrust.

9. In addition to taking possession of each forged WCF check, CASH uttered them by presenting, negotiating, and depositing each forged WCF check into her personal checking

accounts at SunTrust or, alternatively, obtaining cash – all with the intent to deceive SunTrust.

The 58 transactions are as follows:

TABLE A

Trans. Number	Date Check Issued	Date Check Cleared	Check Number	SunTrust Acct. Where Check Drawn	Check Amount	Payee	WCF Signatory	Endorsing Signature	SunTrust Acct. Where Check Negotiated
1.	07/30/01	07/30/01	3685	206703309	\$1,500	Monica Cash	Executive Dir.	Monica Cash	703710338
2.	08/08/01	08/15/01	7161	206758413	\$3,000	Monica Cash	Illegible	Monica Cash	703710338
3.	08/08/01	08/08/01	7162	206758413	\$3,000	Monica Cash	Executive Dir.	Monica Cash	703710338
4.	08/31/01	08/31/01	3687	206703309	\$500	Cash	Executive Dir.	Monica Cash	
5.	09/12/01	09/12/01	7168	206758413	\$400	Cash	Political Dir.	Monica Cash	703710338
6.	09/24/01	09/24/01	3692	206703309	\$2,000	Monica Cash	Executive Dir.	Monica Cash	703710338
7.	10/02/01	10/03/01	7169	206758413	\$1,000	Monica Cash	Executive Dir.	Monica Cash	703710338
8.	10/15/01	10/15/01	7171	206758413	\$500	Cash	Political Dir.	Monica Cash	703710338
9.	10/25/01	10/25/01	7174	206758413	\$1,500	Monica Cash	Executive Dir.	Monica Cash	703710338
10.	11/09/01	11/09/01	4060	206703279	\$1,500	Cash	Executive Dir.	Monica Cash	703710338
11.	11/15/01	11/15/01	7177	206758413	\$1,000	Monica Cash	Executive Dir.	Monica Cash	703710338
12.	11/20/01	11/21/01	3702	206703309	\$800	Monica Cash	Political Dir.	Monica Cash	703710338
13.	11/25/01	11/26/01	3703	206703309	\$1,500	Monica Cash	Political Dir.	Monica Cash	703710338
14.	12/14/01	12/17/01	3704	206703309	\$2,000	Monica Cash	Executive Dir.	Monica Cash	703710338
15.	12/20/01	12/21/01	7180	206758413	\$1,000	Monica Cash	Illegible	Monica Cash	703710338
16.	12/24/01	12/24/01	7181	206758413	\$600	Cash	Executive Dir.	Monica Cash	703710338
17.	01/04/02	01/04/02	4107	206703279	\$300	Monica Cash	Executive Dir.	Monica Cash	703710338
18.	01/11/02	01/11/02	4117	206703279	\$500	Cash	Executive Dir.	Monica Cash	703710338
19.	01/29/02	01/29/02	7184	206758413	\$600	Cash	Executive Dir.	Monica Cash	703710338
20.	02/04/02	02/04/02	7186	206758413	\$500	Cash	Executive Dir.	Monica Cash	703710338
21.	04/05/02	04/08/02	7189	206758413	\$500	Monica Cash	Executive Dir.	Monica Cash	703710338
22.	04/22/02	04/24/02	7191	206758413	\$1,500	Cash	Executive Dir.	Monica Cash	703710338
23.	05/02/02	05/02/02	3723	206703309	\$1,000	Monica Cash	Executive Dir.	Monica Cash	703710338
24.	05/16/02	05/16/02	3724	206703309	\$3,000	Cash	Executive Dir.	Monica Cash	703710338
25.	06/07/02	06/10/02	3725	206703309	\$1,500	Monica Cash	Executive Dir.	Monica Cash	703710338
26.	06/21/02	06/24/02	3727	206703309	\$3,000	Monica Cash	Executive Dir.	Monica Cash	703710338

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27.	07/05/02	07/05/02	3439	206703287	\$1,200	Cash	Executive Dir. Monica Cash	703710338
28.	07/31/02	07/31/02	3729	206703309	\$2,000	Monica Cash	Executive Dir. Monica Cash	703710338
29.	08/19/02	08/19/02	7200	206758413	\$3,000	Monica Cash	Executive Dir. Monica Cash	703710338
30.	09/04/02	09/05/02	3730	206703309	\$1,500	Monica Cash	Executive Dir. Monica Cash	703710338
31.	09/13/02	09/16/02	4382	206703279	\$500	Cash	Executive Dir. Monica Cash	703710338
32.	09/27/02	09/30/02	4388	206703279	\$500	Cash	Executive Dir. Monica Cash	703710338
33.	10/11/02	10/11/02	7205	206758413	\$1,500	Monica Cash	Executive Dir. Monica Cash	703710338
34.	11/04/02	11/06/02	7207	206758413	\$3,000	Cash	Executive Dir. Monica Cash	703710338
35.	11/21/02	11/25/02	3444	206703287	\$800	Cash	Executive Dir. Monica Cash	1000002384237
36.	12/06/02	12/09/02	4475	206703279	\$1,400	Cash	Executive Dir. Monica Cash	703710338
37.	01/08/03	01/08/03	4434	206703279	\$250	Monica Cash	Executive Dir. Monica Cash	703710338
38.	01/17/03	01/21/03	7210	206758413	\$500	Monica Cash	Executive Dir. Monica Cash	703710338
39.	02/06/03	03/24/03	6348	206703260	\$1,000	Monica Cash	Executive Dir. Monica Cash	703710338
40.	02/21/03	02/26/03	3733	206703309	\$1,500	Monica Cash	Executive Dir. Monica Cash	703710338
41.	03/04/03	03/12/03	3734	206703309	\$1,000	Monica Cash	Executive Dir. Monica Cash	703710338
42.	03/18/03	03/20/03	3446	206703287	\$600	Monica Cash	Executive Dir. Monica Cash	703710338
43.	04/03/03	04/07/03	3739	206703309	\$1,000	Monica Cash	Executive Dir. Monica Cash	703710338
44.	04/14/03	04/15/03	3447	206703287	\$1,000	Monica Cash	Executive Dir. Monica Cash	703710338
45.	04/24/03	04/28/04	3740	206703309	\$1,000	Monica Cash	Executive Dir. Monica Cash	703710338
46.	05/21/03	05/27/03	3448	206703287	\$2,000	Monica Cash	Executive Dir. Monica Cash	703710338
47.	06/10/03	06/16/03	3748	206703309	\$1,500	Monica Cash	Executive Dir. Monica Cash	703710338
48.	06/24/03	06/26/03	3449	206703287	\$2,000	Monica Cash	Executive Dir. Monica Cash	703710338
49.	07/02/03	07/03/03	3753	206703309	\$5,000	Monica Cash	Executive Dir. Monica Cash	703710338
50.	07/28/03	07/29/03	4263	206703295	\$600	Monica Cash	Executive Dir. Monica Cash	703710338
51.	08/25/03	08/26/03	7221	206758413	\$1,000	Monica Cash	Executive Dir. Monica Cash	703710338
52.	08/28/03	09/02/03	3771	206703309	\$2,000	Monica Cash	Executive Dir. Monica Cash	703710338
53.	08/28/03	09/03/03	3453	206703287	\$1,000	Monica Cash	Executive Dir. Not endorsed	703710338
54.	09/11/03	09/12/03	7223	206758413	\$1,000	Monica Cash	Executive Dir. Monica Cash	703710338
55.	10/06/03	10/07/03	6364	206703260	\$5,000	Monica Cash	Executive Dir. Monica Cash	703710338
56.	10/22/03	10/23/03	6369	206703260	\$2,000	Monica Cash	Executive Dir. Monica Cash	703710338
57.	11/17/03	11/19/03	7228	206758413	\$1,500	Monica Cash	Executive Dir. Monica Cash	703710338
58.	12/23/03	12/26/03	3457	206703287	\$1,000	Monica Cash	Executive Dir. Monica Cash	703710338

10. CASH concealed the disbursements from WCF's business checking accounts (as set forth in Table A, above) by deleting the transactions from WCF's internal database in order to avoid detection.

11. As a registered political committee, WCF was required by law to file periodic financial disclosure reports with the FEC that accurately reflected, among other things, all of WCF's disbursements, including, but not limited to, all total disbursements as well as the name and address of any person who received a disbursement in an aggregate amount or value in excess of \$200 within the calendar year, together with the date, amount, and purpose of any such disbursement. 2 U.S.C. §§ 434(b)(4), 434(b)(6)(B)(v).

12. WCF's internal database was the primary tool used by WCF to track donor information, contribution amounts, and disbursements. The data that CASH entered into WCF's internal database was ultimately used to complete financial disclosure reports filed with the FEC. Because she maintained WCF's internal database, CASH's duties included preparing the FEC financial disclosure reports.

13. When prompted, WCF's internal database automatically formatted the recorded data, calculated the financial information, and placed it into the proper FEC disclosure form. CASH sent the financial disclosure reports to the FEC electronically.

14. By deleting from the internal database the fraudulent disbursements to herself listed in Table A, above, CASH caused WCF's quarterly and other periodic reports to the FEC to be inaccurate because they understated WCF's actual disbursements. For example, on or about January 31, 2002, CASH filed a year-end report (FEC Filing No. 26483) with the FEC covering the period July 1, 2001 through December 31, 2001. In this year-end report, CASH listed WCF's total disbursements as \$277,022.88 when, as CASH knew, in truth and in fact, WCF's actual total disbursements was \$318,822.88.

15. As a result of CASH's embezzlement of WCF funds and her attempts to conceal her embezzlement by deleting disbursements to CASH from WCF's internal database, CASH also caused the following reports to the FEC to be inaccurate by falsely reporting WCF's disbursements:


TABLE B

04/12/02	32009	April Quarterly	01/01/02 - 03/31/02	\$223,260.20	\$225,160.20
07/09/02	41083	July Quarterly	04/01/02 - 06/30/02	\$175,315.22	\$185,815.22
10/15/02	54595	Oct. Quarterly	07/01/02 - 09/30/02	\$137,822.39	\$145,382.39
10/21/02	57434	Pre-General	10/01/02 - 10/16/02	\$50,519.77	\$52,019.77
12/04/02	67046	Post-General	10/17/02 - 11/25/02	\$184,626.52	\$187,626.52
01/29/03	73035	Year-End	11/26/02 - 12/31/02	\$35,854.39	\$37,254.49
07/30/03	92555	July Quarterly	01/01/03 - 06/30/03	\$452,782.34	\$459,532.34
01/28/04	105414	Year-End	07/01/03 - 12/31/03	\$417,357.22	\$427,857.22

* * *


The preceding statement is a summary, made for the purpose of providing the Court with a factual basis for my guilty plea to Count 2 in the Indictment filed against me on March 16, 2007. I am competent to make this statement, and I do so knowingly and voluntarily and because I am in fact guilty of the crime charged. I have discussed this factual basis with my attorneys, and I understand that this statement is admissible as evidence against me if I failed to comply with the plea agreement.

DATE: April 19, 2007



MONICA J. CASH
Defendant

A.J. KRAMER
Federal Public Defender



CARLOS J. VANEGAS
Assistant Federal Public Defender
Federal Public Defender's Office
625 Indiana Avenue, NW, Suite 550
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Attorney for Defendant