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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	No. _____
)	
Plaintiff,)	
)	
vs.)	
)	
BEVERLY L. MASEK,)	
)	
Defendant.)	
)	
_____)	

FACTUAL BASIS FOR PLEA

At all times relevant hereto:

1. BEVERLY L. MASEK ("MASEK") was an elected member of the Alaska House of Representatives, having been first elected in 1994. MASEK represented District 15, located in or around Willow, Alaska. MASEK served as an elected member of the Alaska House of Representatives until 2004. As an elected state legislator, MASEK was aware that the State of Alaska received more than \$10,000 in federal funding in 2003.

2. VECO Corporation was a privately held company that was incorporated in a State other than the State of Alaska. VECO was a multinational corporation that provided services to

the energy, resource, and process industries and to the public sector. VECO was comprised of multiple subsidiary companies and, collectively, VECO was engaged in interstate commerce in connection with the foregoing projects.

3. At various times, the Alaska State Legislature had issues and matters under consideration that had a substantial business impact on VECO. Therefore, VECO and its principals took an active interest in the Alaska State Legislature's consideration of those issues and matters.

4. BILL J. ALLEN was the Chief Executive Officer and principal owner of VECO.

5. RICHARD L. ("RICK") SMITH was the Vice President of Community and Government Affairs of VECO.

6. Legislative Aide A was a legislative staff employee who previously worked for MASEK while MASEK was an elected member of the Alaska House of Representatives.

7. On or about April 16, 2003, MASEK told Legislative Aide A to locate RICK SMITH. MASEK sought to discuss her financial difficulties with SMITH and/or ALLEN.

8. On or about April 18, 2003, MASEK and ALLEN agreed to meet in Anchorage, Alaska to discuss MASEK's financial difficulties.

9. On or about April 18, 2003, MASEK met with a relative of ALLEN's at a restaurant in South Anchorage, Alaska. At this meeting, ALLEN's relative gave MASEK several thousand dollars in cash. MASEK accepted this money knowing that VECO and its clients had matters pending before the Alaska State Legislature that were important to ALLEN and VECO's business interests.

10. On or about April 18, 2003, MASEK deposited \$2,000 that she received during the meeting with ALLEN's relative in a branch office of a bank located in South Anchorage, Alaska.

11. On or about May 6, 2003, MASEK introduced House Bill ("H.B.") 300 in the Alaska House of Representatives. H.B. 300, among other things, sought to repeal the then-existing method for taxing the production of oil within the State of Alaska. As a state legislator, MASEK understood at the time that the taxation of the production of oil resulted in millions of dollars in revenue for the State of Alaska.

12. On or about May 7, 2003, ALLEN met with MASEK in MASEK's legislative office in Juneau to discuss H.B. 300. ALLEN told MASEK that H.B. 300 was harmful to VECO's oil clients and that, as a result, MASEK needed to withdraw the bill.

13. On or about May 7, 2003, during the same meeting, ALLEN called a former state legislator to discuss the issue with MASEK. The former state legislator also told MASEK to withdraw H.B. 300.

14. On or about May 7, 2003, MASEK agreed with ALLEN and the former state legislator to withdraw H.B. 300.

15. On or about May 7, 2003, MASEK asked Legislative Aide A to prepare "bullet points" on her action to withdraw the bill. MASEK then withdrew H.B. 300.

16. On or about May 8, 2003, ALLEN provided MASEK with \$2,000 in cash in Juneau, Alaska. MASEK received and accepted this money knowing that it was given, in part, because of her agreement to withdraw H.B. 300.

17. On or about May 8, 2003, MASEK deposited the \$2,000 in cash received from ALLEN during the meeting referenced above in a branch office of a bank located in Juneau, Alaska.

18. Between in or about May 2003 and on or about July 10, 2003, MASEK met with ALLEN and SMITH to discuss MASEK's financial difficulties. During the meeting, MASEK asked ALLEN and SMITH for money. ALLEN and SMITH told MASEK that she should re-start her dog kennel and dog racing team and that VECO would help get money to MASEK by sponsoring her dog team.

19. On or about June 12, 2003, MASEK sent by facsimile a letter and resume to SMITH soliciting consulting work with VECO. MASEK advised SMITH in the cover letter that she would be in Anchorage on June 16, 2003, and was hoping to meet with SMITH at that time.

20. On or about July 10, 2003, MASEK told Legislative Aide A to meet with SMITH in an attempt to secure financial help for MASEK from VECO.

21. On or about July 10, 2003, Legislative Aide A met with SMITH at a club in Anchorage, Alaska. During the meeting, SMITH told Legislative Aide A that SMITH and ALLEN could not provide MASEK with a large cash payment, but would be willing to sponsor her dog kennel and dog racing team.

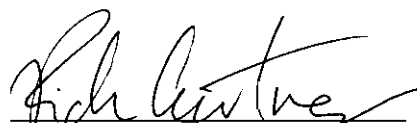
22. On or about November 10, 2003, MASEK asked Legislative Aide A to locate SMITH for purposes of soliciting financial help.

23. BEVERLY L. MASEK acknowledges that the statements and admissions contained in the foregoing Factual Basis for Plea do not constitute all of the facts relevant to the matters discussed herein, nor do the foregoing paragraphs contain a complete discussion of the acts taken and/or crimes committed by MASEK and/or her co-conspirators. Instead, MASEK

understands that this Factual Basis for Plea is merely a summary of some, but not all, criminal conduct engaged in by MASEK. MASEK further understand that she may be required at future proceedings to provide further and more complete details of the matters discussed herein.

DATED: March 10, 2008


BEVERLY L. MASEK
Defendant


RICHARD CURTNER, ESQ.
Counsel for Defendant