



Forensic Litigation Consultants LLC

102 Feather Hill Lane
Media, PA 19063

Mr. Anthony J. Albence
State Election Commissioner
905 S. Governors Avenue, Suite 170
Dover, DE 19904

Mr. Albence:

I have been engaged by you to examine the campaign finance reports of the Committee to Elect Bethany Hall-Long (hereinafter, the "Committee") specifically as they relate to disbursements made to Bethany Hall-Long and her husband, Dana Long, throughout calendar years 2016-2023. The disbursements became a matter of public record in November 2023 when the Committee disclosed them as repayment of loans due Bethany Hall-Long and Dana Long. I've been engaged to reconcile the Committee expenditures against records it produced in support of its assertion that they constitute loan repayments to the Longs.

Qualifications

I am qualified to opine as an expert on the matters contained herein based upon my forty years of public accounting, forensic audit, internal/occupational fraud, and due diligence investigative experience. I am a former licensed Certified Public Accountant, a Certified Information Systems Security Professional, and am currently a Certified Fraud Examiner.¹

I enjoyed a 25-year FBI career, retiring as the senior executive in charge of the Philadelphia Division of the FBI, its sixth largest field office. There, I led Counter Terrorism, Counterintelligence, Cyber Security, Public Corruption, Criminal Enterprise, Financial Crimes, Major Corporate Fraud, and Violent Crime investigations as well as physical and information security programs. Throughout my FBI career I held several positions including Special Agent in Charge of the Louisville Division, Finance Division Assistant Director and Chief Financial Officer, Inspector in Charge, and others. As a case agent, I specialized in complex white-collar crime / public corruption investigations, recording a multitude of felony convictions in the areas of financial institution fraud, bankruptcy fraud, bribery and corruption, economic extortion, false claims, mail and wire fraud, money laundering, computer fraud and abuse, and others.

Before joining the FBI, I led criminal tax evasion and tax-money laundering investigations as an IRS Criminal Division special agent. I also worked in an audit and public

¹ The Association of Certified Fraud Examiners is an international organization of over 90,000 professional fraud examiners. Its activities include producing anti-fraud resources, tools, training, and networking. The ACFE grants the professional designation of Certified Fraud Examiner (abbreviated CFE)

accounting practice with the former Peat, Marwick, Mitchell & Company, known today as KPMG. For 12 years, I led Global Security and Fraud Operations for Vanguard, the world's largest investment management company with responsibility for the protection of its personnel, assets, reputation, and client assets of \$5.1 trillion. My CV is attached hereto as Appendix C.

My fees are not contingent in any way with the outcome of this engagement. I reserve the right to amend or supplement this report should additional documentation and information be provided. I further reserve the right to provide a rebuttal to any report or analysis submitted by the Committee, if requested to do so.

Background

On November 10, 2023, the Committee filed amended campaign finance reports with the Department of Elections, amending 13 reports from 2016 through 2022 and disclosing previously undisclosed cash payments made to Dana Long, the candidate's long-time husband and campaign treasurer. In response to media inquiries, the Committee stated the payments were reimbursement of loans made it by Bethany Hall-Long and Dana Long through their use of personal credit cards on behalf of the Committee. It also pointed to \$70,000 in loans extended the campaign.

According to media reporting, questions surrounding possible financial irregularities began percolating in September 2023. Reportedly at the urging of staff, the Committee hired an independent CPA firm (Summit CPA Group, LLC) to audit its expenditures. In a September 28, 2023 statement, Bethany Hall-Long announced she'd requested a review of her past campaign finance reports, learning there, "may have been reporting issues that require attention."² She also said she was, "working with independent campaign finance experts and forensic accountants to thoroughly audit the finances," and would amend any campaign finance reports as needed.³

In a report to the Committee dated October 23, 2023, the Summit CPA Group concluded, "all disbursements from the account have been associated with campaign-related expenses and loans and no money is due the campaign by any related party or outside party. The account is reconciled."⁴

In the weeks leading up to the Committee's November 10, 2023, filing of amended reports, various media outlets reported over \$200,000 in undisclosed payments to Dana Long, noting the Committee failed to disclose both the expenditures and loans on its campaign finance reports. According to media accounts, in filing its amended reports the Committee reported several loans from Bethany Hall-Long totaling \$308,134, and repayments of \$206,985. When announcing the filings, the Committee said, "Hall-Long has personally loaned the campaign \$101,149.35 more than she has been repaid."⁵

Some in the media were not satisfied, and reporting critical of the Committee and Bethany Hall-Long persisted through early January 2024. On January 26, 2024, you engaged my firm to examine the campaign finance reports of the Committee specifically as they relate to the

² Barrish, Cris, [Revolt in Bethany Hall-Long's Delaware gubernatorial campaign - WHYY](#), November 16, 2023, accessed March 5, 2024

³ Ibid.

⁴ Summit CPA Group LLC report to the Committee dated October 23, 2023 attached as Exhibit 3

⁵ Barrish, Cris, [Revolt in Bethany Hall-Long's Delaware gubernatorial campaign - WHYY](#), November 16, 2023, accessed March 5, 2024

candidate loans and related disbursements. I was to reconcile the Committee expenditures against records it produced in support of its assertion that the payments constituted loan repayments to Bethany Hall-Long and Dana Long.

Findings and Conclusions

For the period January 1, 2016, through September 12, 2023⁶, based upon the records and information made available to me, I found that disbursements to the Longs exceeded their record of advances to the Committee by \$33,178.65. In other words, they disbursed themselves \$33,178.65 more than I was able to substantiate in personal loans to the campaign. A summary reconciliation of Advances to Disbursements by year follows:

The Committee to Elect Bethany Hall-Long						
Total Substantiated Candidate Advances - Disbursements Reconciliation Summary						
1/1/2016 - 9/12/2023						
Year	Cash	Substantiated Candidate Personal Checks	Substantiated Credit Card Expenditures	Substantiated Paper Receipts	Total Substantiated Candidate Advances to Committee	Total Disbursements to Bethany Hall-Long and Dana Long
2016	\$0.00	\$15,334.50	\$84,038.65	\$0.00	\$99,373.15	\$62,781.24
2017	\$4,500.00	\$1,327.00	\$5,717.40	\$0.00	\$11,544.40	\$12,000.00
2018	\$0.00	\$3,060.00	\$8,492.86	\$0.00	\$11,552.86	\$36,300.00
2019	\$0.00	\$3,680.00	\$5,574.38	\$0.00	\$9,254.38	\$12,000.00
2020	\$0.00	\$50.00	\$34,879.52	\$0.00	\$34,929.52	\$84,156.11
2021	\$0.00	\$1,501.00	\$1,891.28	\$0.00	\$3,392.28	\$54,961.53
2022	\$60,000.00	\$1,240.00	\$24,834.32	\$0.00	\$86,074.32	\$15,105.00
2023	\$0.00	\$2,353.00	\$7,440.90	\$0.00	\$9,793.90	\$21,789.58
Grand Totals	\$64,500.00	\$28,545.50	\$172,869.31	\$0.00	\$265,914.81	\$299,093.46
Excess of Disbursements Over Documented Advances						\$33,178.65

Table 1

By category, the Longs advanced \$64,500 in cash to the campaign, wrote \$28,545.50 in personal checks against campaign expenses, and charged \$172,869.31 in campaign expenses to personal credit cards. Their substantiated advances to the campaign total \$265,914.81. They disbursed themselves \$299,093.46. The net amount represents a balance due to the campaign.

In its report of October 23, 2023, the Summit CPA Group found that the campaign's account had been fully reconciled, and that no money was due the campaign by any related party or outside party. In contrast, I was unable to fully reconcile the campaign's account expenditures to receipts or other audit evidence, and I found the candidate owed the campaign \$33,178.65. I cannot account for the difference in our findings.

Similarly, in its 2023 Year-End Campaign Finance Report, the Committee reported it owed the candidate \$112,471.90 in loans. Further, it showed that loan debt forgiven by the candidate as of September 23, 2023. Once again, I cannot account for the difference in their public reporting and my findings.

⁶ I cutoff the 2023 reconciliation of expenditures to advances at 9/12/2023 because that was the expenditure end date used by the Committee in its 2023 Annual Campaign Finance Report.

The process through which I reached my findings is found at Section 6 of the Detail section of this report. A record of the data and people made available for my examination as well as relevant exhibits may be found in the Appendix and Exhibits sections of this report.

Detail

1. The Committee Payments to Bethany Hall-Long and Dana Long

Some observations regarding the payments / disbursements to the Longs:

1) None of the payments to the Longs were shown by the Committee in its campaign finance reports as an expenditure of any campaign, even though required by Delaware law. Expenditures are defined in part as, "...any payment made or debt incurred, by or on behalf of a candidate or political committee."⁷ In reporting expenditures, the Committee was to disclose the, "Full name and mailing address of each person to whom any expenditure has been made by such political committee during the reporting period in an aggregate amount in excess of \$100, the amount, date and purpose of each such expenditure and the name of, and office sought by, each candidate on whose behalf such expenditure was made."⁸

I interviewed Dana Long in his capacity as former Treasurer to the Committee to Elect Bethany Hall-Long on 6/14/2024. Long told me he'd never read the Delaware Elections Code and was unaware a loan reimbursement payment met the definition of an "expenditure" and thereby was to be reported. In reading the relevant code sections from a document I'd handed him, he said this was the first time he'd seen or read them.

2) In five instances, the true payee (the party to whom an expenditure was made) was obscured by the Committee in its public campaign finance reports through a false entry under the heading "Payee Name." In four instances the payee was Dana Long, yet he as the Committee's treasurer reported the payee as a party other than him:

- a) Schedule B to the *2016 Annual Campaign* report shows an 11/1/2016 expenditure of \$20,000 to Buying Time LLC, 650 Massachusetts Ave NW, Washington, District of Columbia, 20001.

The actual expenditure was made through check #1714 for \$20,000 payable to Dana Long. The check posted on 11/1/2016. The memo entry reads, "Campaign expense reimbursement." I found a corresponding charge of \$20,000 to Dana Long's AMEX card made on 10/31/2016.

- b) Schedule B to the *2020 30 Day General Campaign* report shows a 1/9/2020 expenditure of \$7990 to Reybold Marketing Media, 116 E. Scotland Drive, Bear, Delaware, 19701.

Check #1919 for \$7990 dated 1/7/2020 was written to Dana Long, with the memo notation "Reybold Invoice 041917." I found a corresponding charge of \$7990 on 1/7/2020 to his credit card, and an online payment to the card in this amount on 1/10/2020.

⁷ 15 Del C. § 8002 (12)

⁸ 15 Del C. § 8030 (d)(9).

- c) The *2020 Annual Campaign* Schedule B reports a \$13,460.37 expenditure on 10/28/2020 to Cycle Strategy, 812 Lombard Street, #11, Philadelphia, Pennsylvania, 19147.

In tracing to the actual disbursement, I found check #1930 dated 10/30/2020 for \$13,500 written to Dana Long. The memo notation reads, "Reimbursement for expenses." I found a corresponding charge of \$13,460.37 made to his Citi card on 10/28/2020.

- d) The *2021 Annual Campaign* Schedule B reports a 09/24/2021 expenditure of \$3600 to NGP VAN, Inc, 1101 15th Street, NW, Suite 500, Washington, District of Columbia, 20005.

The underlying check #1993 for \$3600 dated 9/23/2021 was payable to Dana Long. It bears the memo notation "NGP Van reimbursement." Here I found no personal credit card charge or check to substantiate him being reimbursed \$3600.

e) The fifth instance of a false payee involved Jennifer Mueller, who public reports describe a former chief fundraiser who quit the campaign shortly before Hall-Long announced her run for governor. In its 2022 Annual report, the Committee reported an expenditure of \$2500 on 9/14/2022 to Benchmark Strategies, 303 Massachusetts Ave NE, Washington, District of Columbia, 20002, yet the disbursement was made by check payable to Mueller. I found no record of a campaign expense to substantiate this disbursement to her.

In my interview of Dana Long, I did not get beyond questioning him on the very first instance of a falsified payee – the \$20,000 Buying Time expenditure of 11/1/2016. After telling me the reported "payee" in the Committee's Campaign Finance Report is the person or entity to whom a check is written,⁹ he had no answer for why he reported the payee as Buying Time LLC when in fact the payee was him (I laid a copy of the expenditure check before him). He said nothing. When I asked him why he didn't accurately report the payee as Dana Long, he asked for private time with his counsel.

After a few minutes of private time between the two followed by debate with the attorneys regarding my line of questioning, Long's counsel said Dana Long would not entertain or answer any further questions on his reporting of this expenditure. When I told him I had questions around four more instances of falsified payees, he said if I asked those questions he'd direct Long to not answer. I respectfully discontinued my questioning and told Long's counsel I'd indicate in this report that Dana Long refused to answer questions on this subject at the direction of counsel.

It is indisputable that Long wrote four of the five expenditure checks at issue to himself, yet publicly reported them in the Committee's Campaign Finance Reports as written to someone else. The fifth check he wrote to Jennifer Mueller, yet reported it, too, as issued to someone else. Why he publicly reported these five expenditures as made to a payee other than the true payee remains unexplained.

⁹ Long three times either said or acknowledged that the "Payee" heading in reporting the Committee's expenditures is meant for the name of the person to whom a check was issued. In the instance of a debit to the Committee account, the "Payee" heading is meant for the name of the entity which debited the Committee account for goods or services provided the campaign.

For details on each entry, see my Comments to Exhibit 2, Tabs 2016 Annual, 2020 30 Day General, 2020 Annual, 2021 Annual, and 2022 Annual. Also see multiple exhibits at Exhibit 5.

- 3) All but one “reimbursement” check was made payable to Dana Long or to his benefit. A single check payment of \$1100 was made to Bethany Hall-Long in 2021. I was able to substantiate \$600 of the amount as a campaign-related expense.
- 4) Whereas many payment checks bore a memo notation referencing credit card reimbursement, credit card expenses, or expense reimbursement, some referenced a fundraiser or specific campaign related expense, such as a vendor invoice.
- 5) The Committee did not, and has yet to, disclose \$69,933.00 in disbursements to Dana Long made in 2016 and 2020-2022. He issued another four checks to himself in 2023 totaling \$21,789.58 that also remain undisclosed as of this report. The undisclosed disbursements to Long total \$91,722.58.

In sum, over the period 1/1/2016 through 12/31/2023, Dana Long wrote 113 checks from the Committee account to himself, cash, or to Bethany Hall-Long. He issued 112 checks to himself and/or cash, and a single check to Bethany Hall-Long, for a grand total of \$299,903.46. The 113 checks each constituted a reportable “expenditure” of the campaign, yet 109 were never reported by the Committee in its original campaign finance reports. The remaining four checks were reported as expenditures by the Committee, but were misrepresented as issued to a payee other than Dana Long.

Not until the Committee amended its 2016 through 2022 reports followed by its 2023 Annual Report did it disclose in large part these disbursements to the Longs, not as expenditures as required by the elections code, but as a repayment of candidate loans.¹⁰

2. The Longs’ Use of Credit Cards to Incur Campaign-Related Expenses

Some observations regarding the Longs’ use of personal credit cards to incur campaign-related expenses follow:

In reconciling the loan payments to the Longs, I found that Dana Long wrote himself several large dollar Committee checks in or around the day he’d made a similar (or identical) charge to his personal credit card. I found a pattern of him paying down his card balance shortly after receiving the Committee check. I also found that multiple campaign expenses that Dana Long could have paid by Committee check he instead charged to a personal credit card. In many instances, more than enough money was in the Committee’s operating account for him to issue a check to the vendor, yet he chose to charge the expense to a personal credit card. The checks described in the preceding report section, for example, clearly fit this pattern.

Notably, I found that nearly all campaign-related charges were made to rewards cards, i.e., a hotel sponsored card, a cash-back type rewards card, and multiple airline sponsored cards - all earning points. Fifteen of the 16 cards used by the Longs to incur campaign-related expenses

¹⁰ In examining the Committee’s amended 2016-2022 returns and its 2023 Annual Return, I found that none of the disbursement checks to the Longs were reported as an “expenditure,” even though each clearly meets the definition of an expenditure under the code, and each expenditure was to show the name and mailing address of the person to whom the expenditure was made, and the date, amount, and purpose of the payment.

earned bonus points.¹¹ Charging over \$170,000 in campaign-related expenses to personal credit cards led to substantial points awards.

In his interview of 6/14, Dana Long admitted he and Bethany Hall-Long made use of the points awards, but he disputed the notion that earning points was a primary driver behind the couple's credit card use.

Long kept no spreadsheets, schedules, or other record of his credit card charges contemporaneous with the charges, relying on his monthly statements and memory alone in determining how much the campaign owed him, and which charges were campaign-related (and which were not) in filing the Committee's campaign finance reports.

More expansive detail regarding the Longs' use of personal credit cards in relation to campaign expenses may be found in Dana Long's memorandum of interview dated 6/14/2024, attached as Exhibit 4 to this report.

3. The Campaign's Candidate Loan Reporting

In its 2016 Year End Campaign Finance report, the Committee disclosed loans of \$70,000 from the candidate. According to Long, the \$70,000 represented the amount owed him and Bethany Hall-Long in 2016 personal credit card charges for campaign related expenses. He reported the loan based on a conversation with an elections commission employee who told him his use of a personal credit card to pay campaign expenses constituted a reportable loan to the campaign.

Despite the Longs charging another \$100,000 or more in campaign expenses to their personal credit cards during 2017 through 2020, the Committee inexplicably reported no further candidate loans in its original campaign finance reports. It reported the candidate's 2016 loan of \$70,000 as reduced to \$26,800 by year-end 2022, and then as forgiven by the candidate in 2023.

On 11/10/2023, the Committee amended its 2016 through 2022 campaign finance reports to report the additional candidate loan activity it had failed to report throughout those years, reporting a final 2022 balance of \$101,149.35 owed the candidate.¹²

I asked Dana Long if it was true the campaign owed him and Bethany Hall-Long \$101,149.35 as of 12/31/2022. After private time with his counsel, he responded he had no knowledge of being owed this amount, had no idea what the true amount might be, and couldn't vouch for either the campaign's numbers or those of the Summit CPA Group. When I asked him why the campaign announced it owed the candidate \$101,149.35 as of 2022 year-end, he said he didn't know, and further couldn't speak for the campaign.

At his 6/14 interview, and through his attorney, Long gave me his personal calculation of loan reimbursement payments to him for the period 1/1/2016 – 12/31/2022, stating the campaign in its amended reports of November 2023 had underreported the total disbursements made to

¹¹ Points were redeemable for lodging, air travel, and on one card for cash back, reduced travel, and to purchase gift cards and merchandise.

¹² Schedule D-2, Amended 2022 Year End Committee to Elect Bethany Hall-Long Campaign Finance Financial Report, dated 11/10/2023.

him by \$69,933.00. His total of \$276,918 in total reimbursements was slightly less than my \$277,303.88 total, but I was able to reconcile it to my number.¹³

That Dana Long found the campaign had underreported its loan repayments to him by \$69,933 is consistent with a document I found among the Committee's production to the Department of Elections. A "Loan Workflow Summary" document substantially understated the amounts disbursed to the Longs in 2016 and 2020-2022. Long couldn't explain the understatement and didn't know who produced the summary, speculating the campaign produced it in amending its 2016 through 2022 campaign finance reports.

Setting aside how it reported the candidate loan disbursements, the Committee failed to report the candidate loans as a contribution to the campaign, despite Delaware law defining a contribution in part as, "any advance, deposit, gift, expenditure or transfer of money or any other thing of value, to or for the benefit of any candidate or political committee involved in an election, including without limitation any...Loan."¹⁴ Making an advance to a campaign, or absorbing an expenditure on behalf of a campaign, falls squarely within this definition of a contribution and, as such, was to be publicly reported.¹⁵

When I asked Long why he didn't report the loans as contributions, he said he was unaware that the elections code required an advance or loan to the campaign be reported as a contribution.

4. The Evidence of Candidate Loans to The Committee

In response to multiple requests of the Department of Elections, the Committee produced no formal record of loans made to it by the Longs, including any loan agreements, promissory notes, or other documents showing loan amounts, interest rate, due date, security, or other terms traditionally associated with a commercial or personal loan. Long confirmed in his 6/14 interview that the loans between him, Bethany Hall-Long, and the campaign were informal, without any documentation.

What the Committee did produce as evidence of loans extended it by the Longs comprised the Longs' personal credit card statements, images of cancelled checks written from a joint personal checking account, and retail merchant sales receipts – all with a representation the Longs incurred expenses on behalf of the Committee through the use of personal credit cards and writing of personal checks.

Within a banker's box of Committee documents I found monthly credit card statements for 15 cards issued to the Longs for the period December 5, 2015, through December 31, 2022,¹⁶ segregated by campaign. The statements bore handwritten notations, arrows, tick marks, and other markings presumably made by someone associated with the Committee, the Longs themselves, or a Summit CPA Group associate. Someone had highlighted certain charges as purportedly campaign related. On March 22, 2024, the Committee produced statements for a 16th credit card for calendar year 2023 that someone had redacted for all but purported campaign

¹³ The difference is reconciled by a 2021 reimbursement check of \$345.88 that Long apparently missed, and errors totaling \$40.00 he made in recording two other checks.

¹⁴ 15 Del. C. § 8002 (8)(c).

¹⁵ 15 Del. C. § 8030 (d)(2).

¹⁶ Not all cards spanned the entire examination timeframe. Accounts were opened and closed throughout the timeframe; account numbers changed; statement periods varied; and 2016 statements for an AMEX card were noted by the Committee as unavailable.

related charges.

I considered, but didn't limit myself to, all these indicators in performing my analysis of credit card charge advances made to the campaign by the Longs. Exhibit 3 of this report depicts detail on the 16 cards.

Also among the Committee records were images of cancelled checks, front and back, written from an M&T Bank account in the registration Bethany A. Hall-Long and Dana A. Long, segregated in folders by campaign. These, too, bore handwritten "Post It" type notes on several, but not all, copies. The checks spanned the period January 19, 2016, through October 24, 2022, and were segregated by campaign. On March 22, 2024, the Committee produced additional images of cancelled checks written from this same M&T Bank account for calendar year 2023.

Further, I found retail merchant sales receipts associated with some, but not all, campaigns, segregated in manilla folders. Nearly all bore handwritten notations specifying the associated campaign. I considered these notations, too, in my analysis.

Finally, within each campaign folder (by year) was a copy of a campaign finance report as originally filed; a detailed Excel spreadsheet that appeared to contain data used as the basis to amend each campaign's specific campaign finance report on 11/10/2023; and a copy of the amended report. The Excel spreadsheets appeared to capture entries drawn from the original filing, newly added campaign expenditures, adjustments based on loans to the campaign, a record of any loan repayments, etc., leading to amended totals. I showed these to Dana Long in his interview, and he concluded with a fair degree of confidence that Cheryl Webb, as the campaign's current treasurer, produced them. He recognized the data as drawn from the Department of Elections campaign finance reporting system.

In a separate manilla file folder, I found a single page document that appeared to summarize all loans from the candidate on an annual basis, including a record of loan advances by and payments made to the candidate. This was the summary that substantially understated the disbursements to Long.

This represents the totality of documents the Committee provided the Department of Elections as evidencing loans or advances to the campaign by the Longs.

5. The Campaign's Expenditures Reporting Generally

Some observations regarding reported expenditures:

- 1) While tracing Committee checks to source documents, I recognized several cancelled checks as undoubtedly written against a campaign debt yet found they'd not been reported as an expenditure in the associated campaign finance report. Alternately, I found several expenditures as reported by the Committee that could not be traced to any source document, i.e., a cancelled check, credit card statement, candidate personal check, or receipt.
- 2) In tracing to source documents, I found expenditures that did not accurately report the true amount of the expenditure. In each case the publicly reported Committee expenditure exceeded its actual (true) dollar amount.

- 3) For the Committee's five 2016 campaigns, I substantiated as campaign related only 13 of over 250 small-dollar expenditures shown as credit card charges at small retailers, such as gas stations, convenience stores, pizzerias, home improvement stores, groceries, restaurants, sub shops, pharmacies, etc. Well over 200 of the expenditures I couldn't find or trace to any source document.
- 4) In comparing expenditures across campaigns by year, the small-dollar type expenditures described above didn't repeat themselves in subsequent campaigns. In nine campaigns from 2017 through 2023, the Committee reported no similar campaign expenditures even though throughout those years the Longs made a substantial number of small-dollar charges from near-identical gas stations, convenience stores, pizzerias, home improvement stores, groceries, restaurants, sub shops, etc.
- 5) Although the 2023 Annual (Year-End) Campaign Finance Report is for the entire calendar year, the Committee inexplicably left a gap in its reporting of all expenditures (and contributions) between 9/12/2023 and 12/29/2023. In that period, it incurred additional expenditures of nearly \$125,000 that appear unreported.
- 6) The Committee reported a 12/29/2023 "expenditure" of \$540,000 to the "Committee to Elect Bethany Hall-Long" that represented a transfer to an unknown deposit account, i.e., I didn't find a corresponding deposit at an associated Committee account at Citizen's Bank.¹⁷ It reported a 12/31/2023 movement of \$114,675.66, presumably between associated bank accounts, that I couldn't find on any bank statement – WSFS or Citizens. I found no evidence of this transaction. Finally, it did not report a July 2023 wire of \$525,000 from WSFS to Citizens Bank shortly after opening the Citizens account, nor a wire of \$400,000 between banks in November 2023.¹⁸

In conclusion, I find the Committee's account of expenditures in its public campaign finance reporting incomplete, inconsistent, and often inaccurate, leading to an unreliable picture of its financial affairs. Further, I find that several reported expenditures (especially in 2016) are questionably personal, and not campaign related. Finally, in those five instances in which the Committee misrepresented the true payee of an expenditure, I find its public campaign finance reporting misleading.

6. Methodology and Analysis

Scope of Work

My analysis involved examination of the following documents and data. All documents were provided by the Committee unless noted otherwise:

- The Committee's WSFS Bank account monthly statements and cancelled check images (front only) for the period May 31, 2016, through January 31, 2024
- The Committee's WSFS Bank account monthly statements for the period January 1, 2016, through May 30, 2016 as obtained from the bank through a Department

¹⁷ The Committee likely opened and funded a savings account at WSFS Bank, given the money movement was noted as a "transfer" (likely intrabank) and not a wire transfer to another institution.

¹⁸ While "payment" as used in the definition of an expenditure may not encompass funds transfers between campaign accounts, the Committee's reporting was inconsistent and haphazard. Here it chose to report some but not all transfers between accounts as expenditures, and one particular transfer appears non-existent.

of Elections subpoena¹⁹

- The Committee's Citizens Bank account monthly statements and cancelled check images (front only) for the period May 31, 2023, through January 31, 2024
- Four specific deposit items from the January through May 2016 M&T Bank statements of Bethany Hall-Long and Dana Long produced by M&T Bank pursuant to subpoena on April 23, 2024
- Monthly credit card statements for 16 cards issued to the Longs collectively for the period December 5, 2015, through December 31, 2023
- Monthly statements for an AMEX card issued to Dana Long for the period 11/30/2015 through 1/27/2017, provided by AMEX on 6/3/2024 pursuant to a Department of Elections subpoena
- Cancelled checks, front and back, written from an M&T Bank account in the registration Bethany A. Hall-Long and Dana A. Long, for the period January 19, 2016, through November 21, 2023
- Retail merchant sales receipts associated with some, but not all, campaigns
- Summit CPA Group LLC reports, workpapers, schedules, and other documents obtained through a Department of Elections subpoena on April 11, 2024
- The Committee to Elect Bethany Hall-Long campaign finance reports, original and as amended, for the period 2016 through 2023²⁰
- A schedule of Committee Disbursements to Dana Long for the period 1/1/2016-12/31/2022 given me by Dana Long through his counsel on 6/14/2024

Beyond records examination, through invitations sent by you as the Delaware State Department of Elections Commissioner, I sought interviews of Karen Remick, CPA, of the Summit CPA Group, and Dana Long as the former Treasurer of the Committee to Elect Bethany Hall-Long. Given their roles in this matter, both were positioned to answer a great many questions I had and possibly influence if not fully inform my findings.

Karen Remick declined to be interviewed. Consequently, I can't provide a fully informed explanation for how and why Summit chose its audit methodology, how it reached its conclusions, or specifically how and why its findings differ from mine.

Dana Long submitted to interview as the Committee's former treasurer on June 14, 2024, in the presence of his personal counsel. On the phone throughout the interview was counsel for the Campaign to Elect Bethany Hall-Long. While I've woven select portions of Dana Long's statement throughout this report, it may be found in its entirety at Exhibit 4. Associated interview Exhibits are at 4.1.

Reconciliation Process

To arrive at my findings and conclusions, I performed the following:

- Scheduled every Committee account check made payable to Dana Long, Bethany Hall-Long, or however drawn and negotiated by them, recording and totaling them as

¹⁹ The bank could not produce images of checks written against the account, handicapping my reconciliation of expenditures to source documents. Notably, I found no corresponding expenditure for five checks written from the Committee account totaling \$12,496.24, all of which I eventually found were made payable to Dana Long.

²⁰ Office of the State Election Commissioner, Delaware Campaign Finance Reporting System [View Filed Reports \(delaware.gov\)](https://www.delaware.gov/cfrs), accessed multiple days.

disbursements made to their benefit.

- For every campaign for 2016 through 2023, extracted Expenditures from Schedule B of each Campaign Finance Section Financial Report filed by the Committee with the Delaware Department of Elections. I extracted the data directly from the Department's Campaign Finance Reporting System.
- For every campaign, I attempted to trace each reported expenditure to a source document evidencing that expenditure, categorizing my findings as:
 - Substantiated – Based on the source document, the expenditure was made and was conclusively or most probably campaign related.
 - Substantiated / Indeterminate – Based on the source document, the expenditure was made but was indeterminate in nature, i.e., there was no evidence to support a conclusion it was campaign related. The expenditure may just as well have been personal in nature. For example, absent additional evidence supporting the conclusion a charge at Panera Bread for \$11.99 was campaign related, I found it Indeterminate.
 - Unsubstantiated – No source document was found in any record provided by the Committee or other parties to show the expenditure was made.

As noted, if I found no source document, I categorized the expenditure as Unsubstantiated. If I traced to a source document, I noted the nature of that document, e.g. a Committee check²¹, a personal credit card statement, personal check, etc., and then categorized the expenditure as either Substantiated or Substantiated / Indeterminate.

The standard of proof I applied in examining a source document was a “preponderance of the evidence,” defined as evidence which shows that a fact to be proven is more probable than not. A preponderance is also defined as evidence that shows that the fact in dispute is more likely than not. Some legal scholars describe it as that amount of evidence that would tip an evenly balanced scale in favor of a fact in dispute. The question I asked myself was, “is it more likely than not the source document evidences a campaign expenditure?”

- For source documents determined Substantiated / Indeterminate, if I found independent audit evidence that tipped the scale in favor of the document representing a campaign expenditure, I categorized it as Substantiated.
- I credited the Longs with an advance to the campaign for every expenditure I found Substantiated that they made through a personal credit card, check, or based on a merchant receipt showing the use of a personal credit card.
- I credited the Longs with an advance to the campaign for any personal check written directly to the campaign.²²
- I credited the Longs with an advance to the campaign for personal credit card expenditures that conclusively benefited a campaign yet were not recorded as an expenditure on the Committee's campaign finance report. I found a number of such expenditures and added

²¹ On those occasions wherein I had no check image, if I found a check cleared the Committee account in the precise amount of a reported expenditure on or about the date the expenditure was reported, I found that expenditure Substantiated.

²² I credited the Longs with an advance for two of three checks made payable to the campaign. The third, in the amount \$300 and dated 5/20/2019, was noted by the Committee as not an advance, but rather as reimbursement to the campaign for a “possible error” associated with the account.

them to my schedules.

- On a Master Disbursements and Advances Reconciliation spreadsheet, I reconciled the total disbursements to the Longs against the total substantiated advances in their favor and calculated the delta.²³

7. The Summit CPA Group, LLC Report

The Committee engaged the Summit CPA Group on September 21, 2023. They were to examine records, bank statements, credit cards statements and election reports; reconcile the bank account; and deliver reports detailing transactions and variations.

In a report to the Committee dated October 23, 2023, authored by Karen Remick, CPA, Summit reported it had reconciled the bank account and found that all disbursements from the account were associated with campaign related expenses and loans, and no money was due to the campaign by any related or outside party. Their engagement letter and report are attached as Exhibit 6 to this report.

Summit's Audit Methodology and Analyses

In examining Summit CPA Group's workpapers, spreadsheets, email traffic, and other documents produced pursuant to Department of Elections subpoena, I found its audit methodology and analyses like mine, with some distinctions. For example, through principally QuickBooks accounting software and Excel, Summit:

- scheduled as funds "loaned" to the campaign any cash infusions to the Committee account by the candidate as well as credit card expenditures identified by her or Dana Long as campaign related. Summit categorized these transactions as "Money in" in schedules titled "Candidate Money in-out," or "Candidate Money in and out." I found schedules by year as well as a single comprehensive schedule for the period June 2016 – December 2022.
- scheduled Committee checks made payable to Dana Long and/or Bethany Hall-Long, recording them as "money out" to the candidate in the same spreadsheets, leading to a reconciliation of monies in, monies out, and balance due to/from the candidate.
- using data extracted from the Committee's publicly filed campaign finance reports, created "Profit & Loss Detail" reports for various calendar years in QuickBooks, capturing contributions to the Committee as "Income" and Committee expenditures as "Expenses." They then appear to have extracted Expense Detail reports (a record of expenditures) for reconciliation purposes.
- attempted to reconcile each reported Committee expenditure to a check or personal credit card statement of the Longs, creating "Variance" reports to capture exceptions. Just as I found, they found expenditures made by the Committee that weren't reported or, conversely, that were reported yet were unsupported by any documentation.

²³ A Master Disbursements to Advances Reconciliation spreadsheet is found as Exhibit 2 to this report. Individual Tabs capture total disbursements to the Longs, individual campaign and total campaign advances made by the Longs, and a credit card / personal checking account legend.

- created a 2016-2020 “Charges” spreadsheet (credit card charges), with individual tabs for each Dana Long and Bethany Hall-Long personal credit card, and asked that Dana Long and/or Bethany Hall-Long identify each charge that was campaign-related.
- appeared to solicit from Dana Long and Bethany Hall-Long any record of additional personal credit card charges that were campaign related but not reported as an expenditure on the related campaign finance report.
- examined the candidate’s personal bank statements and cancelled checks for the years 2016 through 2021 presumably for evidence of personal cash infusions to the Committee account, or personal checks written for campaign-related expenses.

According to Dana Long, his involvement in the Summit CPA Group audit was limited to producing the Committee WSFS Bank statements and cancelled checks, and gathering his credit card statements and identifying charges that were campaign related. He couldn’t recall who gathered the couple’s M&T Bank statements and cancelled checks, but believed it was likely Bethany Hall-Long. He worked through an intermediary ²⁴ in passing information to and answering questions of Summit.

While the Summit CPA Group’s methodology and analysis was similar to mine, I did find noteworthy differences in their audit scope, methodology, and findings as follows:

a) According to their workpapers, their reconciliation period appeared to be 6/1/2016 through 12/31/2022. Their opening date was 6/1/2016 likely because Committee bank account records were unavailable predating 5/31/2016. I don’t know why their reconciliation cutoff date was 12/31/2022. My scope was 1/1/2016 through 9/12/2023, consistent with the Committee’s campaign finance reports for calendar years 2016 through 2023.

b) For the period 6/1/2016 through 12/31/2022, Summit found the Longs disbursed themselves \$261,807.64. In applying that period, I find they disbursed themselves \$264,807.64. The difference is a \$3000 check made payable to “Cash” by Dana Long that Summit inexplicably excluded. Long had reimbursed himself this amount for a specific fundraiser, and Summit should have included it in its calculations of “money out” (a reimbursement) to the candidate.

c) Summit’s audit methodology was to give the Longs credit for any personal credit card charge Dana or Bethany Hall-Long claimed to have been campaign-related. Email exchanges between Summit personnel, various credit card “Charges” spreadsheets exchanged with Dana and Bethany Hall-Long, and other Summit production discloses they asked the Longs to identify any charge that was campaign related and accepted their word. I found no evidence Summit sought additional audit evidence to satisfy itself that hundreds of charges that are arguably personal were, in fact, campaign related.

d) Summit also appeared to accept 2016 charges purportedly made to Dana Long’s AMEX credit card as campaign related without evidence Long had made any charges at all. Summit had no 2016 AMEX statements to trace to for documentation, and I found nothing in its workpapers to

²⁴ At Bethany Hall-Long’s request, Kelli DiSabatino, a personal friend of the Longs, “volunteered” to help reconcile the Committee expenditures to the Long’s credit card charges. According to Long, DiSabatino also had a relationship with the Summit CPA Group and Karen Remick. Email traffic between and among Remick, DiSabatino, and the Longs suggests DiSabatino was not a Summit employee but an intermediary between the Longs, the Committee, and Summit.

conclude it traced to alternate audit evidence to find that any charges had occurred.²⁵

In a key distinction between my reconciliation and Summit's, I sought to substantiate both that an expenditure occurred and that it was campaign related. I consistently sought competent audit evidence to confirm both. If I found an expenditure was Substantiated by a source document, yet there was no evidence beyond the candidate's representation to support a conclusion it was campaign related, I found it Indeterminate.

That the Summit CPA Group did not appear to seek audit evidence beyond the Long's representation that certain credit card charges were campaign related, and further accepted purported 2016 charges as campaign related with no documentation the charges had occurred, likely accounts in large part for the difference in our respective findings.²⁶

Reconciliation: Summit Findings to My Findings

I found two Summit spreadsheets among its workpapers that reached slightly different conclusions regarding sums advanced to, and taken from, the campaign by the Longs. One Summit had created on 10/20/2023, the other on 10/31/2023, both authored by Karen Remick. In the latter spreadsheet (presumably showing final calculations), Summit concluded the campaign owed the Long's \$2,726.10 at year end 2022.²⁷ If Summit had included the reimbursement check of \$3000 that I submit it should have shown as a disbursement, they'd have found that the Longs owed the campaign \$273.90.

Summit's calculation that the campaign owed the candidate \$2,726.10 as of 12/31/2022 is at odds with the campaign's amended 2022 Year-End Campaign Finance Report. That report declared the campaign owed the candidate \$101,149.35 in outstanding loans.²⁸

Summit's calculated totals of "money in-money out" also conflict with mine. In scoping my examination period to match that of Summit, I found the Longs advanced the campaign \$254,320.91, disbursed themselves \$276,607.64, and owed the campaign \$22,286.73 as of year-end 2022.

In sum, Summit's workpapers appear to show it reached conclusions that differ from both mine and those of the campaign, as evidenced by the campaign's public declarations and reporting.

Summit Work Product and the Campaign's Amended Campaign Finance Reports

There was little documentation within the Summit CPA Group production to answer the question who produced the Committee's amended campaign finance reports of 11/10/2023, specifically who calculated the candidate "Loans Received," "Payments," and "Balance" due amounts. Its focus appeared to be a reconciliation of the Committee's account, with no effort to reconstructing the candidate's loans to the campaign. Other than a solitary email written by

²⁵ Throughout this engagement and in response to multiple inquiries of the Department of Elections, the candidate and the Committee steadfastly maintained it had no 2016 AMEX credit card statements available to it or to the Department. The Department of Elections resorted to a subpoena to obtain them.

²⁶ Given Karen Remick declined an interview in this matter, I can't provide a fully informed explanation for why Summit chose the audit methodology it did, how it reached its conclusions, or specifically how and why its findings differ from mine. Nor do I know why their internal calculations differ from their final report to the Committee.

²⁷ Excel spreadsheet titled, "Committee to Elect Bethany Hall Long Transactions by Account," created 10/31/2023 and authored by Karen Remick. The spreadsheet of 10/20/2023 had found the campaign owed the candidate slightly more money - \$2,746.56.

²⁸ Schedule D-2, Amended 2022 Year End Committee to Elect Bethany Hall-Long Campaign Finance Financial Report, dated 11/10/2023.

Remick to DiSabatino referencing, “Not sure what you want to do about the loan part of the election report...,” I found no workpapers, schedules, notes, or other Summit documents touching upon this topic.

Further, I did not find in the Summit production the detailed spreadsheets reconstructing the candidate’s loans that I found within the Committee’s production of records. Nor did I find in Summit’s records the multi-page loan reconciliation that substantially understated the disbursements made to the Longs. This would suggest a person or persons with the Committee (and not Summit) likely made the candidate loan calculations that appear in its amended campaign finance reports of 11/10/2023. This conclusion is consistent with Dana Long’s belief that the campaign likely produced the loan calculations.

8. External Sources of Information

I referenced several external sources of information as part of this examination. For example, I researched payee names, addresses, and other merchant specifics through the internet to aid in determining if an expenditure was campaign related. I also researched media reporting on this matter, the Delaware Code, and accessed the Delaware Campaign Finance Reporting System, all through the internet. Independent of the Committee’s productions, the Department of Elections obtained records from WSFS Bank, M&T Bank, AMEX, and the Summit CPA Group through subpoena, all of which I considered as part of my analyses. Dana Long also produced records as part of his interview. I’ve cited specific sources in text or through footnotes to this report.

All opinions expressed in this report are to a reasonable degree of professional certainty.



Jeffrey A. Lampinski
Principal
Forensic Litigation Consultants, LLC
Certified Fraud Examiner

Dated: July 13, 2024

Appendix A

Statement of Assumptions and Limiting Conditions

My reconciliation is subject to the following assumptions and limiting conditions:

1. Public information, and information provided by the Committee and others, upon which all or portions of this reconciliation is based, are believed to be dependable. I make no representation as to the accuracy or completeness of such information and have performed no procedures to corroborate the information.
2. The scope of my examination was January 1, 2016 through September 12, 2023. I make no representations as to any possible candidate advances to the Committee, or disbursements to the candidate as repayment of those advances, made outside this timeframe or incapable of examination due to the unavailability of records.
3. This report is made solely to assist the Delaware Department of Elections in satisfying questions it has regarding the 2016 through 2023 original and amended campaign finance reports of the Committee to Elect Bethany Hall-Long. My findings should not be used for any other purpose, or by any other party for any purpose. Neither my work product nor any portions thereof may be disseminated to third parties without my prior written consent and approval. My report and work product are confidential, made between me as a forensic accountant / examiner and the Department of Elections as my client.
4. My reconciliation is valid only for the stated purpose as of the reconciliation date. I take no responsibility for and assume no obligation to revise my conclusions to reflect events or conditions that occurred or occur subsequent to the reconciliation date.
5. No change of any item in this report shall be made by anyone other than the author. I shall have no responsibility for any unauthorized change.

Appendix B
List of References

1. The Committee's WSFS Bank account monthly statements and cancelled check images (front only) for the period May 31, 2016, through January 31, 2024
2. The Committee's WSFS Bank account monthly statements for the period January 1, 2016, through May 30, 2016, obtained through a Department of Elections subpoena
3. The Committee's Citizens Bank account monthly statements and cancelled check images (front only) for the period May 31, 2016, through January 31, 2024
4. Four specific deposit items from the January through May 2016 M&T Bank statements of Bethany Hall-Long and Dana Long, produced by M&T Bank pursuant to a Department of Elections subpoena on April 23, 2024
5. Specific cancelled check images, front and back, from the Long's M&T Bank account for the period January 19, 2016, through November 21, 2023
6. Monthly credit card statements for 16 credit cards issued to the Longs for the period December 5, 2015, through December 31, 2023 as depicted in Exhibit 3
7. Monthly statements for an AMEX card issued to Dana Long, for the period 11/30/2015 through 1/27/2017, provided by AMEX pursuant to a Department of Elections subpoena on 6/3/2024
8. Retail merchant sales receipts associated with some, but not all, campaigns
9. Summit CPA Group LLC engagement letter, report, and underlying schedules, workpapers, and other documents produced pursuant to a Department of Elections subpoena on April 11, 2024
10. The Committee to Elect Bethany Hall-Long campaign finance reports, original and as amended, for the period 2016 through 2023
11. A schedule of Committee Disbursements to Dana Long for the period 1/1/2016-12/31/2022, produced by Dana Long and given me by his counsel on 6/14/2024

Appendix C



Jeffrey A. Lampinski, CFE
Principal
Forensic Litigation Consultants LLC
Media, PA

A retired FBI senior executive and corporate chief security officer, Jeff brings forty years of criminal investigative and accounting experience to forensic accounting, internal/occupational fraud, sensitive Human Resources and employment law, and due diligence investigations. He is also deeply experienced in fraud risk management, financial services fraud prevention, detection, and response, fraud risk and controls, and fraud governance.

Senior Security and Fraud Executive – Vanguard

For 12 years, Jeff led Global Security and Fraud Operations for the world's largest investment management company, with responsibility for the protection of its personnel, assets, reputation, and client assets of \$5.1 trillion. Jeff specialized in internal/external fraud, information security, and physical security risk assessments; fraud and cybercrime prevention, detection, and response; workplace threat assessment and response; travel risk management; and executive protection. He also led crisis management planning and response and related strategic planning, policy development and implementation, as well as fraud and security training and awareness programs across 15 offices operating in 80 countries worldwide.

Senior Executive – Federal Bureau of Investigation

Jeff enjoyed a 25-year FBI career, retiring as the senior executive in charge of the Philadelphia Division of the FBI, its sixth largest field office. There he led Counter Terrorism, Counter Intelligence, Cyber Security, Public Corruption, Criminal Enterprise, Financial Crimes, Major Corporate Fraud, and Violent Crime investigations as well as physical and information security initiatives. Throughout his FBI career he held several positions including Special Agent in Charge of the Louisville Division, FBI and Finance Division Assistant Director and CFO, Inspector-In-Charge of the 1996-1999 Campaign Finance Task Force, and others through assignments in Boston, Washington, Norfolk, New Orleans, Louisville, Philadelphia, and elsewhere. As an FBI executive, he also helped develop police training standards as a gubernatorial appointee to both the Kentucky Law Enforcement Council and the Pennsylvania Municipal Police Officers Education & Training Commission.

As an investigator Jeff specialized in white-collar crime investigations, recording a multitude of felony convictions in the areas of financial institution fraud, bankruptcy fraud, bribery and corruption, economic extortion, false claims, mail and wire fraud, money laundering, and computer fraud and abuse. Before joining the FBI, Jeff led criminal tax evasion and tax-money laundering investigations as an IRS Criminal Division special agent, and enjoyed audit practice experience with KPMG.

Education and Certifications

Jeff is a former Certified Public Accountant, Certified Information Systems Security Professional, and a current Certified Fraud Examiner. He earned his undergraduate degrees from Bryant University and attended Saint Joseph's University's Haub Business School as part of its MS in Financial Services program. As an FBI executive, he also earned graduate level certificates from the Kellogg School of Management and the Police Scotland College, Kincardine Fife, Scotland.

Exhibits

Note: Double click any exhibit embedded as a file to view. If an Excel spreadsheet does not render properly, save it locally and open it with MS Excel.

1 Summary of Disbursements to Advances All Years



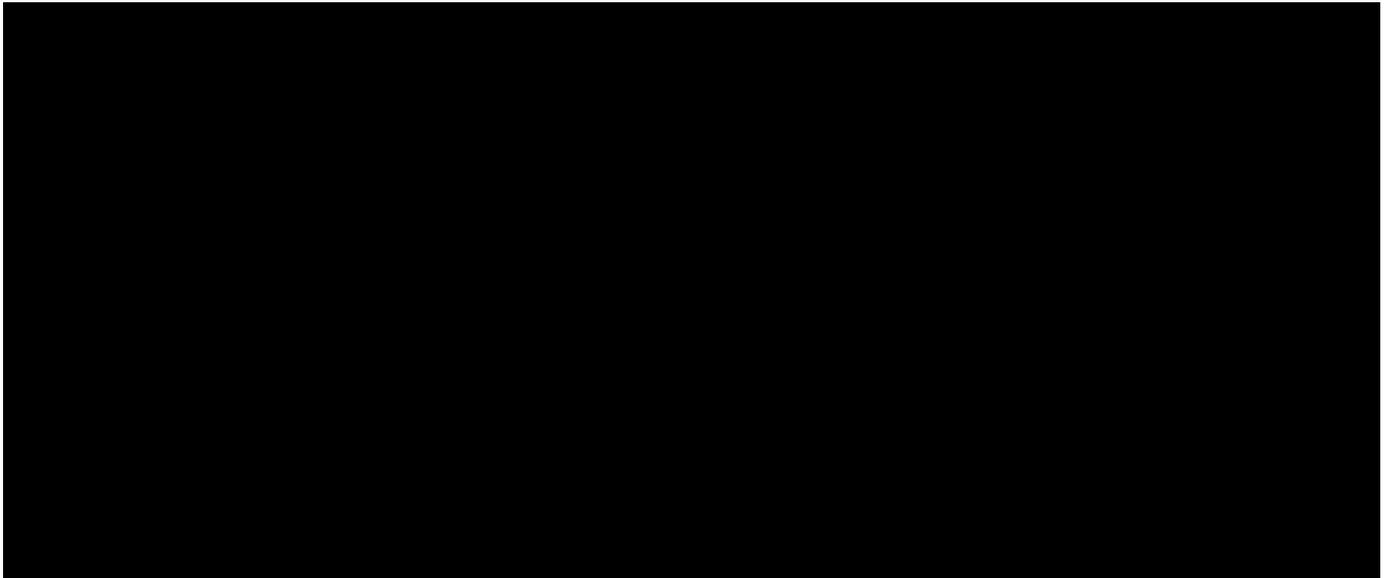
Grand%20Total%20
Advances%202016-2

2 Master Disbursements to Advances Reconciliation



Disbursements%20-
%20Advances%20Re

3 Dana and Bethany Hall-Long Credit Card Detail



4 Dana Long Memorandum of Interview dated 6/14/2024



06142024%20Memo
%20of%20Interview

4.1 Dana Long Memorandum of Interview - Associated Exhibits



Post It Note.pdf

5 Expenditure “Payee Name” Exhibits



Buying Time
LLC.pdf



Reybold
Marketing.pdf



Cycle Strategy.pdf



NGP Van.pdf



Benchmark
Strategies.pdf

6 Summit CPA Group, LLC Report



Summit CPA Group
Engagement Letter (



Summit CPA Group
Report 10232023.pd