Complaint Description

Glen Morgan (Fri, 25 Oct 2019 at 1:06 AM)

To whom it may concern,

It has come to my attention that the "A Better Spokane PAC" has also egregiously and with malice aforethought planned to violate Washington State's campaign finance laws (**RCW 42.17A**), colluded to violate these laws, actively violated the law, and the violations continue at this time during the 2019 election cycle. The specific violations and details explaining these violations are detailed below.

Please note, do not confuse "A Better Spokane PAC" with the previous similar complaint I filed against "Better Spokane PAC" which is (in theory) a different entity. The treasurers for both PACs are the same. The officers for both PACs are the same. The bank for both PACs is the same. The email address is the same. The address for the PACs is also the same, with only the difference being THIS PAC is located at "suite 206" at 510 W. Riverside, Spokane, WA 99201, and the "Better Spokane PAC" (no "A") is theoretically located at "suite 500."

1) Actively attempting to conceal the identity and source of what appears to be an illegal funneling of secretive, dark money from hidden, illegal, foreign, or anonymous sources. (Violation of RCW 42.17A.715, RCW 42.17A.235, RCW 42.17A.240, RCW 42.17A.220, RCW 42.17A.470, and RCW 42.17A.750(2)(a) and (c))

This PAC has received one dominant cash contributions from one source called "The Standard Trust" and referenced in the attached C3. That contribution is as follows:

- $50,000 – received on Sept 17, 2018 – See **PDC Tracking # 100860085** (attached below)

This PAC was deficient in reporting the legally required information about "The Standard Trust." This contribution, it should be noted, made up 86% of all the cash this very active PAC has obtained over the past few years of involvement and influence in local political campaigns.

"The Standard Trust" doesn't appear to be standard at all, and after I could find no evidence of the existence of this entity on the Washington State Secretary of State's website (either the charity or business search function), I didn't trust that the information available to the public was accurate or truthful. It turns out this was a useful step to take in due diligence **because there is no such thing as "The Standard Trust" located at the address provided to the PDC**. Please see the attached photos which confirm the flagrant falseness and willfully fraudulent nature of this mysterious dark money funnel to this PAC.

You will note that there is a business park at the address “1106 E. Montgomery Drive Ste #102, Spokane Valley, WA” (see photo of business park sign entrance with address clearly displayed). There is a “Suite #102” at this address, according to workers at nearby businesses, however, **nobody occupies that location nor does it appear anyone has occupied that space any time recently.** None of the workers at the neighboring companies had ever heard of “The Standard Trust.” Apparently, the only access to “Suite #102” was over a catwalk (see photo attached), yet **when one attempts to access the catwalk, the entrance has been blocked by construction, and a chainlink fence** (see photo attached). This place was abandoned long ago, and it reminds me of drug cartel money laundering business fronts my friends in law enforcement have described in the past**. It appears that “The Standard Trust” is a front for dark money cash to be funneled or laundered into Spokane area political campaigns so that the public won’t know the source of these dark money funds**.

There is no practical way at this time, without accessing bank records and doing some forensic accounting on this secretive dark money cash source exactly who has provided the $35,000 given to this PAC (and based on PDC records a total of $106,000 of dark money cash into the local Spokane political scene in total over the past few years). **Is the true source of these political campaigns Mexican drug cartels? Is it cash from other sources? Is it Russian?** (my Democratic Party friends have all voted for this option), is it Chinese cash?, or is it just a way to secretively launder cash from legitimate sources in an effort to actively conceal the identity of the true source of the funds? Regardless, this is very strange and it is a first for me at this time. Unfortunately, I expect more situations like this to be uncovered in the near future.

It is inconceivable that this PAC’s manager and officers are not aware of the strange and odd nature of this secretive dark money funding. This is their primary source of cash. They have been willing to conceal the true source of these funds and this can only occur with their collusion in the process and the concealment. Once they have become complicit in this type of coverup to conceal the true source of political dark money, it is unlikely they will suddenly see the light and provide truthful information to the PDC or the public. The coverup will begin once they receive notice of this complaint.

In order for the PDC to get to the bottom of this (I’m now concerned that the willingness to falsify this type of illegal cash indicates a willingness to falsify other documents and provide additional false information to the PDC), there will be a need to review the bank accounts for this PAC, and frankly to access the bank records of this mysterious “The Standard Trust” assuming they even used checks or banks to transfer this dark money cash to this PAC. Maybe they just handed over wads of cash? I don’t believe the PDC yet has the legal authority to subpoena bank records of either entity, and therefore this seems like a case that should be referred to the AG’s office. However, **based on the local politicians who have been supported directly or indirectly by this PACs campaign contributions (however they are laundered), it appears that many of Attorney General Bob Ferguson’s political allies may have directly benefitted from this secretive dark money**. He will likely have to “recuse” himself from this investigation – whatever that means when all the investigative attorneys on this case will be working for you.

Having discovered this, I plan to organized active site visits at all questionable dark money sources around Washington State. Obviously, these entities believe they can easily conceal the source of their secretive political cash. They didn’t believe anyone would check, and nobody has in the past. It is time to do so now. I hope I don’t have to file more complaints similar to this one about other secretive political dark money cash sources, but these things rarely happen in isolation.

Obviously, if the true source of these campaign contributions are "anonymous" then this is a violation of **RCW 42.17A.220(1),** and the cash must be forfeit to the state treasurer to be wasted with the rest of our tax dollars. If this "The Standard Trust" was created to conceal the identity of the source of these funds, then it is obviously a violation of **RCW 42.17A.470** (and some others), if this was done with malice and pre-planning (and it was) then this also demands that the enforcement provisions of RCW **42.17A.750(2)(a) and (c)** be utilized in this case. Regardless of any of this, these contributions have also been illegally and falsely reported to the PDC, which is a violation of **RCW 42.17A.235 (and .240**).

2) Failure to accurately name the PAC (attempt to conceal the primary sponsor) in an effort to conceal dark money from unknown sources from the public (Violation of RCW 42.17A.005 (46)(i), RCW 42.17A.205 and WAC 390-16-011A)

This PAC has violated Washington State's campaign finance laws by failing to properly name the PAC itself. **RCW 42.17A.005 (46)(i)** clearly requires the name of this PAC to be A Better Spokane PAC (Sponsored by The Standard Trust) because "The Standard Trust" represents 86% of the contributions received by this PAC even when combined with all donations from 2018 (see attached C3 – **PDC Tracking # 100860085** detailing the $50,000 cash payment given to this PAC by "The Standard Trust" on September 17, 2018), which is 86% of the total contributions reported to the PDC since the inception of this PAC, and is far more than the 80% threshold required to identify the sponsor of the PAC in the name of the PAC itself (See **WAC 390-16-011A**). The PAC is incorrectly identified and named on its C1, C3, and C4s and it also failed to properly identify itself in any mailer or other communication made by staff at this PAC. This campaign needs to go back and correct the missing and insufficient information provided to the PDC during this well-funded mailing occurring right now in the middle of a political campaign. In addition, they need to refile and correct all the documents filed with the PDC this year and in past years.

This sponsorship name correction is particularly interesting considering allegation #1 above about the dark money and mysterious source of cash coming from "The Standard Trust" which may or may not actually exist and which could be a funnel of illegal, untraceable dark money into local politics. However, even if this gang can somehow pretend the source of this cash is not egregiously illegal, this additional violation is still relevant and remains in effect.

In an effort to be thorough, I will be sending over similar complaints related to the other PACs through which the fake, illegal dark money organization called "The Standard Trust" laundered cash. I will provide additional specific violations related to those cases, but the facts are the facts.

Let me know if you need anything else.

Best Regards,

Glen Morgan

What impact does the alleged violation(s) have on the public?

The public has a right to know who is funding the secret, anonymous, illegal dark money organizations with which this PAC colluded to conceal the source of funds, hide the sponsorship of the PAC and illegally funnel campaign cash into other sources.

List of attached evidence or contact information where evidence may be found.

C3 referenced in complaint is attached. The photos of the site visit to the secret, non-existent dark money "office" location are attached.

List of potential witnesses with contact information to reach them.

Every officer affiliated with this PAC should be subpoenaed. If any live, real person can be found affiliated with the dark Money cash, they should also be subpoenaed and all these interviews should be recorded in case something happens to the potential witnesses before court. If a bank account can be found to trace the illegal cash - it might be necessary to interview the bank manager or employees to learn the truth.

Complaint Certification:

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

PUBLIC DISCLOSURE COMMISSION
711 CAPITOL WAY RM 206
PO BOX 40908
OLYMPIA WA 98504-0908
(360) 753-1111
TOLL FREE 1-877-601-2828

CASH RECEIPTS MONETARY CONTRIBUTIONS

C3 (1/02)

THIS SPACE FOR OFFICE USE
100860085
09-21-2018

Candidate or Committee Name (Do not abbreviate. Use full name.)
A Better Spokane

Mailing Address
510 W. Riverside Suite 206

City	Zip + 4	Office Sought (candidates)	Election Date
Spokane, WA	99201		2018

1. MONETARY CONTRIBUTIONS DEPOSITED IN ACCOUNT

Date Received		Amount	Total
	a. Anonymous		
	b. Candidate's personal funds deposited in the bank (include candidate loans in 1c)		
	c. Loans, notes, security agreements. Attach Schedule L		
	d. Miscellaneous receipts (interest, refunds, auctions, other). Attach explanation		
	e. Small contributions $25.00 or less not itemized and number of persons giving ______ (persons)		

2. CONTRIBUTIONS OVER $25.00

Date Received	Contributor's Name, Address, City, State, Zip	Contributions of more than $100:* Employer's Name, City and State / Occupation	PRI	GEN	Amount	Aggregate* Total
09/17/18	THE STANDARD TRUST 11016 E Montgomery Dr. STe 102 Spokane Valley, WA 99206	Occupation			$50,000.00	$50,000.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				

☐ Check here if additional pages are attached

Sub-total	$50,000.00
Amount from attached pages	$0.00

3. TOTAL FUNDS RECEIVED AND DEPOSITED OR CREDITED TO ACCOUNT
Sum of parts 1 and 2 above. Enter this amount in line 1, Schedule A to C4. $50,000.00

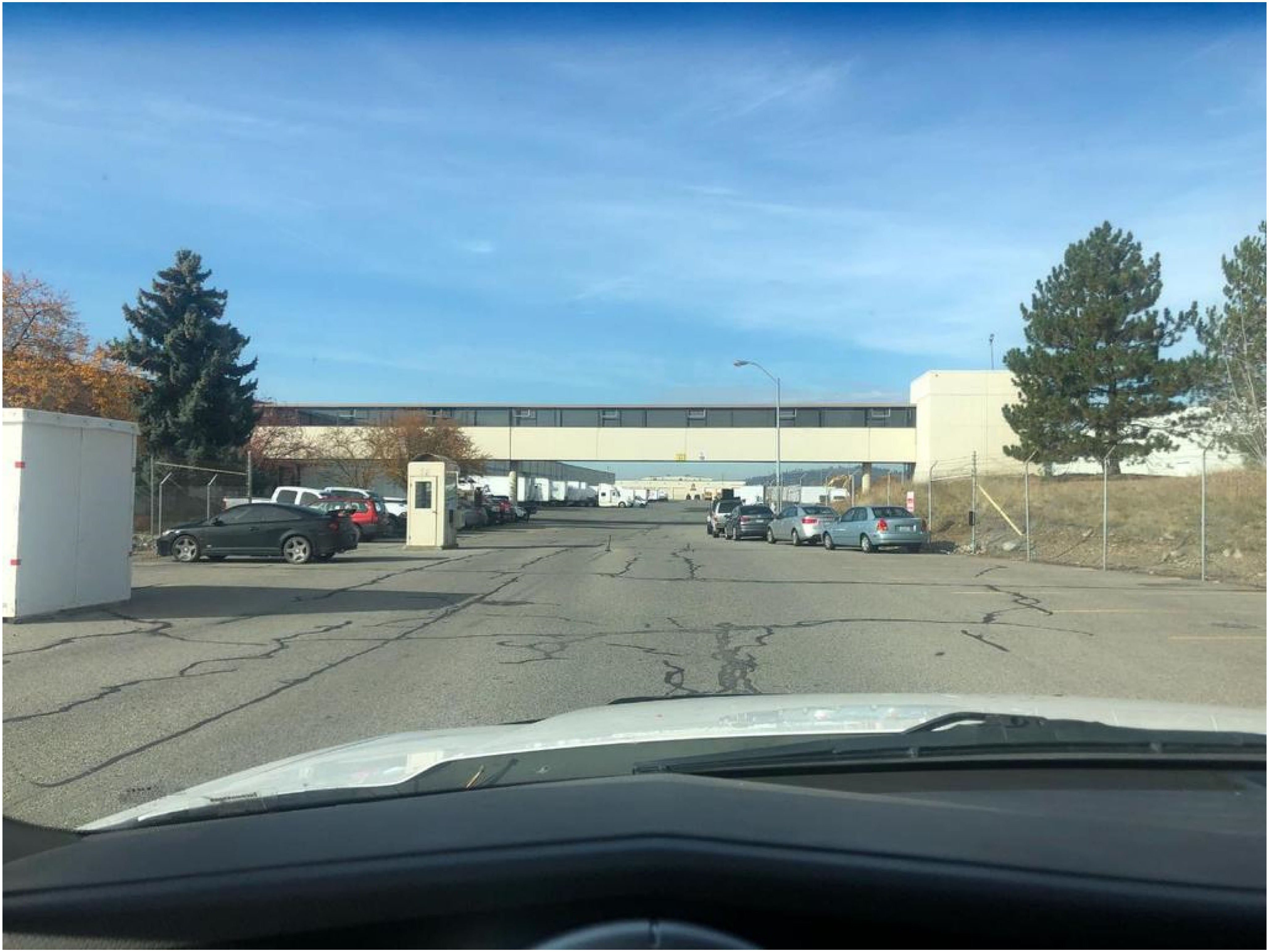
*See reverse for details.

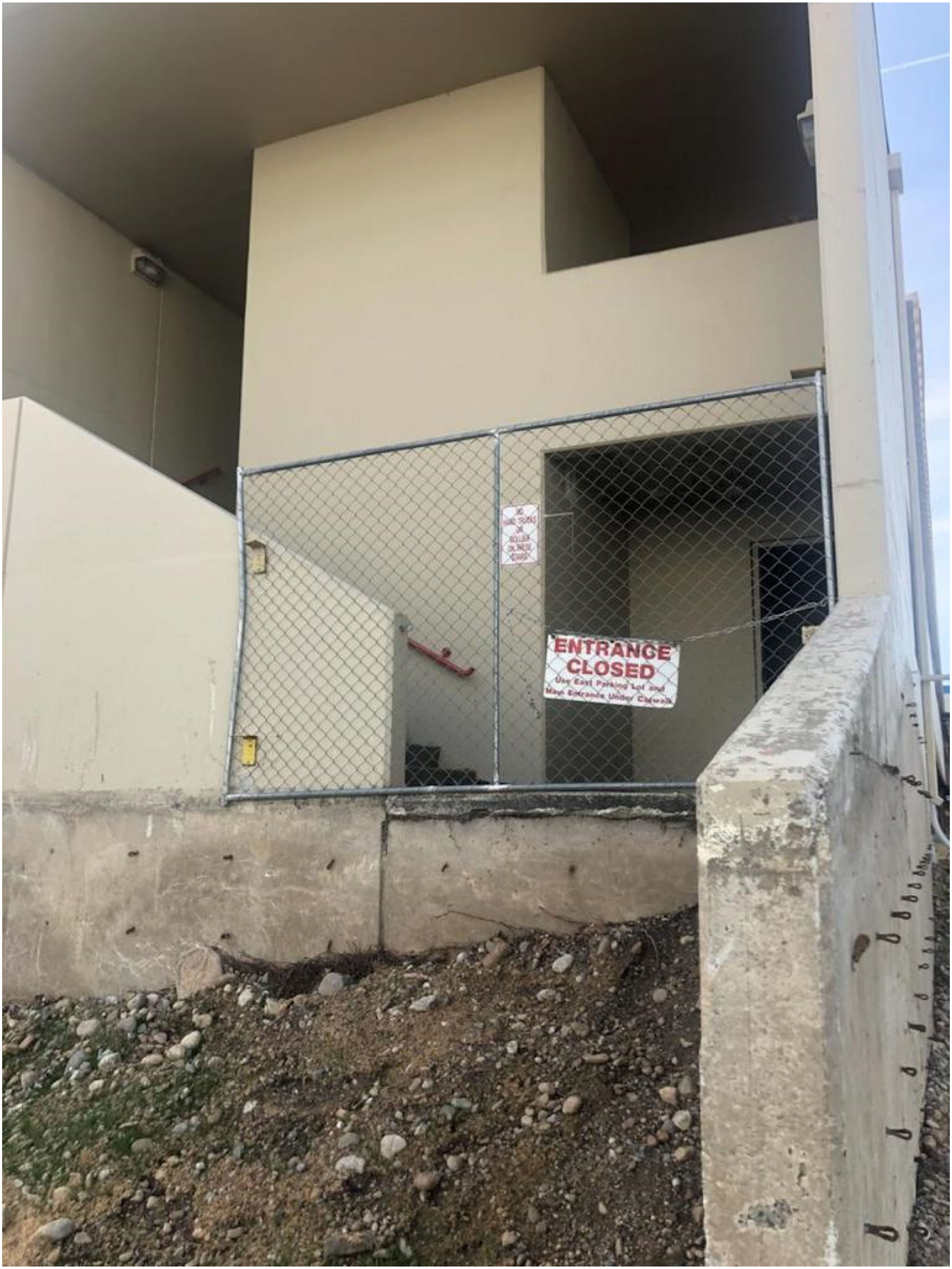
4. Date of Deposit
09/17/18

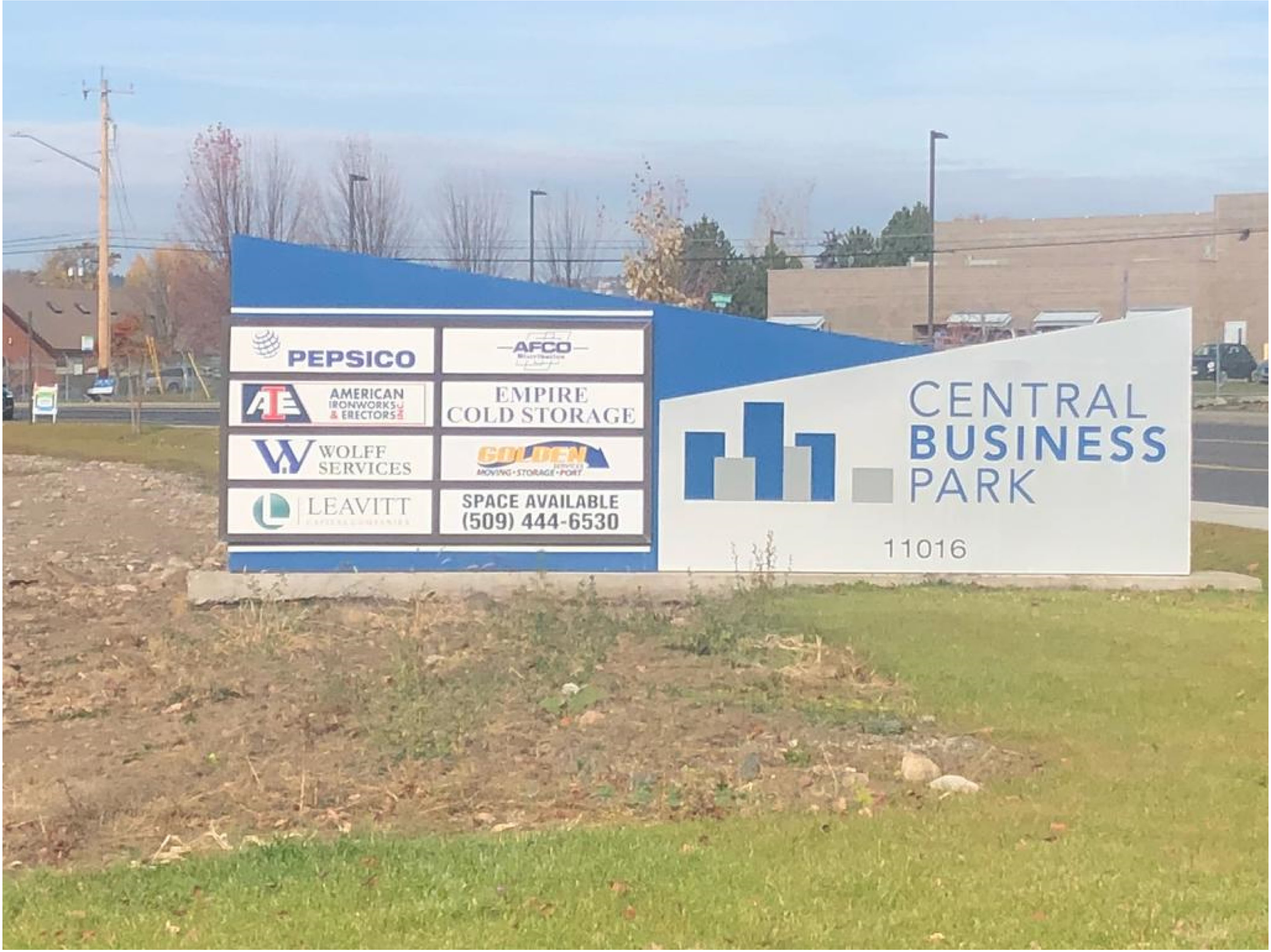
Treasurer's Daytime Telephone No.: (509)999-8315

I certify that this report is true and complete to the best of my knowledge

Treasurer's Signature: Michael J Cathcart
Date: 09-21-2018




ENTRANCE
CLOSED
Use East Parking Lot and
Main Entrance Under Catwalk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(509) 444-6530
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