

## Complaint Description

[Glen Morgan](#) (Fri, 25 Oct 2019 at 1:36 AM)

To whom it may concern,

It has come to my attention that the “Smart Reforms for 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, this is the third leg in the triad of Standard Trust PACs. Do not confuse this complaint with the one I filed against “A Better Spokane PAC” or the previous similar complaint I filed against “Better Spokane PAC” which is (in theory) a different entity. The treasurers for all three PACs are the same. The officers for both PACs are the same, but this PAC adds a few new people. The bank for all PACs is the same. The email address is the same for all of them. The address for the PACs is also the same, with only the difference being THIS PAC is located at “suite 500” at 510 W. Riverside, Spokane, WA 99201, just like the “Better Spokane PAC” (no “A”) and the “Better Spokane PAC” is theoretically located at “suite 206.”

**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:

- \$20,000 – received on Sept 17, 2018 – See **PDC Tracking # 10086008** (attached below)

Please note, one of the other large contributions was from one of the sister PACs “Better Spokane PAC (sponsored by The Standard Trust)” of \$15,000, so the true “The Standard Trust” funding for this PAC is actually at \$35,000 rather than the \$20,000 reported on the attached C3. This PAC was deficient in reporting the legally required information about “The Standard Trust.” This contribution, it should be noted, made up the second largest contributions to this very active PAC.

“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 chain-link 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 secretly 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 (when combined with the \$15k received from “Better Spokane PAC (Sponsored by The Standard Trust) .** 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 describe or provide adequate details advertising expenses. (Violation of RCW 42.17A.240(6) & WAC 39016037, RCW 42.17A.235)**

This PAC's campaign has failed to follow Washington State's Campaign Finance laws as they apply to the reporting of expenditures.

Here is one example that need to be corrected by this major corporate PAC to at least go through the motions and pretend they are complying with the statute: Examples of a failure to provide sufficient detail of expenditures (unambiguous violations of **RCW 42.17A.240(6)** and **WAC 390-16037** (see example B provided at **WAC 390-16-037(3)**) as follows:

For example, the expenditures reported on **PDC Report #100937930** failed to report adequate details associated with a \$12,500 purchase from "Go Big Media" on 10/4/19.

This C4 must be corrected and the appropriate detail provided to be legally sufficient to comply with the statute.

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 about the secretive dark money and illegal cash flowing into PACs like this one attempting to influence local elections. One major illegal source of funds for three major local PACs all colluding together is weird and should be uncovered.

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

C3 and C4 referenced in complaint are attached, as is photos of the dark money false address site.

**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.

**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 **Spokane, WA** Zip + 4 **99201** Office Sought (candidates) \_\_\_\_\_ Election Date **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	P R I	G E N	Amount	Aggregate* Total
09/17/18	THE STANDARD TRUST 11016 E Montgomery Dr. Ste 102 Spokane Valley, WA 99206				\$50,000.00	\$50,000.00
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
		Occupation				
	<input type="checkbox"/> Check here if additional pages are attached	Sub-total			\$50,000.00	*See reverse for details.
		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

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**

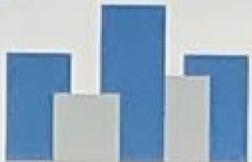




NO SWIMMING  
OR BOATING  
IN THIS AREA

**ENTRANCE  
CLOSED**  
Use East Parking Lot and  
Main Entrance Under C/Walk

 <b>PEPSICO</b>	 <b>AFCO</b> <small>Manufacturing Solutions</small>
 <b>AMERICAN IRONWORKS &amp; ERECTORS</b>	<b>EMPIRE COLD STORAGE</b>
 <b>WOLFF SERVICES</b>	 <b>GOLDEN</b> <small>MOVING • STORAGE • MORE</small>
 <b>LEAVITT</b> <small>OFFICE SOLUTIONS</small>	<b>SPACE AVAILABLE</b> <b>(509) 444-6530</b>

 **CENTRAL BUSINESS PARK**

11016

