

July 31, 2018

Honorable Tim Fox, Attorney General  
Montana Department of Justice  
P.O. Box 201401  
Helena, MT 59260

Dear Attorney General Fox,

Recently a local citizen presented the Ravalli County Board of Commissioners with some concerning information from the Montana Outdoor Coalition regarding how certain environmental groups are funding and engaging in advocacy efforts in Montana.

In our capacity as local elected officials we have been attacked by well-funded organizations who engage in blatant, and extremely misleading political activity with little or no public disclosure of how much money is being raised or from whom the funding is generated. We are frustrated with the lack of transparency and accountability on the funding sources and are concerned with potential non-compliance with state and federal laws by these environmental groups. Moreover, to the extent any of the organizations are tax-exempt under state and/or federal law, their activities should be monitored for compliance with the requirements of tax-exempt organizations.

We believe these groups have economically harmed several of Montana's rural counties reliant upon agriculture, outdoor recreation, natural resources and real, meaningful multiple-use access to our public lands as fundamental components to our local heritage and economic vitality. The 2017 fire season, is the most recent of many, demonstrating the economic impact to our businesses and the emotional harm to our citizens.

We respectfully request that you ask the Montana Department of Justice to investigate the organizations trying to influence Montana voters, including but not limited to the following:

- Montana Conservation Voters – registered with the Montana Secretary of State's Office as a domestic non-profit, public benefit corporation with members.
- Montana Environmental Information Center – registered with the Montana Secretary of State's Office as a domestic non-profit, public benefit corporation with members.
- Montana Wilderness Association - registered with the Montana Secretary of State's Office as a domestic non-profit, public benefit corporation with members.
- Montana Wildlife Federation - registered with the Montana Secretary of State's Office as a domestic non-profit, public benefit corporation with members.
- Backcountry Hunters & Anglers - registered with the Montana Secretary of State's Office as a foreign non-profit, public benefit corporation with members.
- Montana Mountain Mamas – claims to be founded and based in Montana, but has no registration with the Montana Secretary of State's Office; according to their website,

they are a “project” of Resource Media (which has significant out-of-state “partners”:  
<http://www.resource-media.org/partners/>).

- Our Land, Our Legacy – has no registration with the Montana Secretary of State’s Office, but according to media accounts appears to be an offshoot of the Montana Wilderness Association (though there appears to be no attribution or acknowledgement on their website).

We believe an enquiry led or requested by you would be very similar to the previous investigations performed by the Montana Department of Justice regarding whether non-profit hospitals in our state were meeting their obligations under Montana’s non-profit and consumer protection laws. We are not formally requesting an Attorney General opinion at this time, but reserve the right to do so depending on the outcome of your findings.

On June 8, 2018, Governor Bullock announced his Executive Order requiring the recipients of major contracts with the State of Montana to disclose dark money spending in elections. He stated “Where Citizens united opened the door for a wave of dark money, Montana will shine a light... Montana will again stand-up for openness and fairness in politics.” While the entities we are concerned with may not be contracting with the State, their actions are no less impactful to the citizens of Montana. We hope County Commissioners across the State will join us in our quest for transparency and truth.

Respectfully yours,

Ravalli County Commissioners

\_\_\_\_\_  
Jeff Burrows, Chairman

\_\_\_\_\_  
Chris A. Hoffman, Vice-Chairman

\_\_\_\_\_  
Greg Chilcott, Member

\_\_\_\_\_  
Ray Hawk, Member

\_\_\_\_\_  
Doug Schallenberger, Member

## **A Tangled Web Environmentalists Weave.**

**Green Groups – From Russia, China, Bermuda, Switzerland, Hungary, green groups funnel money into Montana through a web of silk and deceit.**

In August of 2014, the Environmental Policy Alliance filed a complaint with the Internal Revenue Service (IRS) against the now Missoula, MT based group, Backcountry Hunters and Anglers. At the time of the filing, BHA's business address was listed as Joseph, Oregon.

BHA is registered as a 501(c)(3) entity, and as such, files a Form 990 tax return. The IRS has set instructions for completing Schedule B - "organizations that meet the 33 1/3% support test and received a contribution greater than 2% of the amount on Form 990, Part VIII, line 1h must complete Schedule B".

According to research by the Environmental Policy Alliance, BHA appeared to meet or exceed that requirement to complete Schedule B and failed to complete Schedule B in violation of IRS rules.

Backcountry Hunters and Anglers was founded as a voice for sportsmen but funding for this organization suggests that it is yet another, in a long-line, radical environmental group.

The complaint states that contributions from the Western Conservation Fund (WCF), the Wilburforce Foundation (WF) and the William and Flora Hewlett Foundations (HF) appear to violate the 2% limit. Specifically:

- 2011 BHA Revenue - \$353,294, WCF Grants - \$99,020, % of BHA Revenue – 28.03%
- 2012 BHA Revenue - \$537,195, WCF Grants - \$179,403, % of BHA Revenue – 33.04%
  
- 2011 BHA Revenue - \$353,294, WF Grants - \$30,000, % of BHA Revenue – 8.49%
- 2012 BHA Revenue - \$537,195, WF Grants - \$34,275, % of BHA Revenue – 6.38%
  
- 2012 BHA Revenue - \$537,195, WCF Grants - \$100,000, % of BHA Revenue – 18.62%

Furthermore, both the Hewlett Foundation (HF) and the Wilburforce Foundation (WF) are both private foundations and file Form 990-PF. As a result, the HF grants exceed 2% of BHA's public support while BHA claimed, for 2012, they received 99.96% of revenue from the public. Likewise, in 2011, WF exceed the 2% rule while BHA claimed 99.94% public funding.

The Western Conservation Foundation also funds the Natural Resources Defense Council and Earthjustice. Just recently, the Natural Resources Defense Council has come under U.S. Congressional investigation and may need to register as a foreign agent due to relationships with Chinese Communist Party Officials .

Specifically, the U.S. House Natural Resources Committee, in a letter to the NRDC, stated:

*“The committee is concerned about the NRDC’s role in aiding China’s perception management efforts with respect to pollution control and its international standing on environmental issues in ways that may be detrimental to the United States,”*

Lawmakers on the committee have asked the NRDC for several documents and an explanation to why the group isn’t registered under the Foreign Agents Registration Act regarding its relationship with Chinese officials.

NRDC Strategic Engagement Director Bob Deans stated “We’re proud of our work, in China and elsewhere, helping to create a more sustainable future for everyone, and we look forward to discussing that work with Chairman Bishop and the committee.” Lawmakers say the NRDC promotes “the image of China as a global environmental leader.”

In the U.S., the NRDC takes a hostile approach in their fundraising efforts proudly claiming to sue the United States Government once every ten days since Trump became President.

Something is rotten in the state of Denmark, or more likely Switzerland and the sprawling 63-acre New York estate of Hungarian George Soros.

**Hansjorg Wyss:** According to the website Activist Facts, Swiss billionaire Hansjorg Wyss, thru his Wyss Foundation is:

*“dedicated to funding radical environmentalist groups that lock off large sections of the American West from development or cattle grazing. In its most recent tax year, the foundation gave six-figure grants to the liberal “sportsmen” group Backcountry Hunters and Anglers, the Center for American Progress, environmentalist law center EarthJustice, the Sierra Club, the Nature Conservancy, and the Big Labor-tied Theodore Roosevelt Conservation Partnership. In December 2013, the Bill, Hillary, and Chelsea Clinton Foundation—which has been widely criticized for taking foreign money while Hillary Clinton served as Secretary of State—announced it had received \$5 million from Wyss.*

*Among the major projects of the Wyss Foundation is purchasing large tracts of rural wilderness and closing it off to resource development, including by handing the tracts over to the government. In 2003, Wyss funded a campaign led by The Wilderness Society to withdraw 26 million acres from productive uses in resource extraction, grazing, and outdoor recreation.*

*And outdoor recreation...*

Research by Green Decoys revealed Swiss billionaire Hansjorg Wyss, thru his Wyss Foundation, has pumped \$22 million into the Western Conservation Foundation and the New Venture fund.

The Western Conservation Foundation funds the Missoula based Hellgate Hunters and Anglers. The New Venture Fund operates the Western Values Project, who, in turn, funds Backcountry Hunters and Anglers.

The Wyss Foundation has poured \$25 million into the Backcountry Hunters and Anglers, Montana Conservation Voters Education Fund, Montana Wilderness Association, Montana Wildlife Federation and other Montana Groups. The Wyss Foundation also funds the Sierra Club.

**George Soros:** Billionaire George Soros funds the Open Society Foundations. Green Decoys, through public financial records, has reported the following relationships and financial contributions.

Resource Media is an Open Society client that manages Montana Mountain Mamas. One of the “Who We Are” Montana Mountain Mamas is Patricia Dowd, who has worked for the Greater Yellowstone Coalition and the Montana Water Stewards – a group formed to pass the Confederated Salish-Kootenai Tribes Water Compact. In Dowd’s words – “At first glance, people think it’s only pertinent to the Flathead area, but once you start looking, it’s a western Montana issue that affects people around Bozeman and all the way to Billings.” In other words, the majority of Montana’s adjudicated water rights will be subjected to the CSKT Water Compact. There is an old say in the West, “Whiskey is for drinking, water is for fighting”.

Open Society also funds the Tides Foundation to the tune of \$63 million. The Tides Foundation contributed \$1.7 million to Montana Conservation Voters Education Fund, Montana Environmental Information Center, Western Organization of Resource Councils and Forward Montana.

Open Society sent \$1.9 million to the New Venture Fund, who operates the Western Values Project who also funds Land Tawney’s Backcountry Hunter’s and Anglers, along with Hansjorg Wyss’s Wyss Foundation. The picture is developing and what the print shows is Backcountry Hunters and Anglers is funded by out-of-country billionaires Hansjorg Wyss and George Soros.

**Klein Limited (Klein LTD).** Green Decoys has tracked \$23 million dollars from Klein LTD to Sea Change Foundation. The money trail after that is not specific, other than the \$23 million was distributed to the U.S. Climate Action Network, Resource Media (Montana Mountain Mamas), the League of Conservation Voters Fund (Montana Conservation Voters) and the Energy Foundation. The Energy Foundation then distributed funds to the Montana Wilderness Association and the Montana Wildlife Federation.

The biggest financial contributor to Montana U.S. Senator Jon Tester, outside of Law Firms and Securities and Investment firms, is the League of Conservation Voters. To date, the League of Conservation Voters has nearly doubled the contributions of investment banking giant Goldman Sachs.

On July 12, 2017, the Washington Times wrote an article regarding Klein Ltd. According to the article, the U.S. House called for a probe into “foreign funding of anti-fracking advocacy”.

In a June 29, 2017 U.S House letter to Treasury Secretary Steven Mnuchin, Klein Ltd was singled out to investigate whether Russian oligarchs have used shell companies to fund environmental activism. The Washington Times continued "The U.S. fossil-fuel boom, driven by technologies like hydraulic fracturing, increasingly presents a threat to Russia's stranglehold on oil and natural gas exports to Eastern Europe. Last month, U.S. producers shipped for the first time liquefied natural gas from a Louisiana export terminal to Poland".

Forward to 2018 and this week, after President Trump pressed for European NATO nations to pay their fair share, Poland was the first to step up and offer land for U.S. military bases.

Klein Ltd is a shell company registered in Bermuda. It conducts business from the law offices of Wakefield Quin. Wakefield Quin is a known attorney office that manages money for any one of several Russia state oil interests that has also been linked to Russian money laundering in the British Virgin Islands. Sea Foundation has donated to the Sierra Club, Natural Resources Defense Council and the Energy Foundation.

This article is a synopsis to why CBU was formed. The threat to any form of recreation that we enjoy on our public lands, as well as private property interests, is very real and very present. We need to end divisions between user groups and form a united front to protect and preserve our multiple-use recreation on public lands, protect private property rights, support responsible resource development and insure agricultural lands are free to produce commodities the American public desires.

*Ben Erickson – CBU Principal*

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# GOVERNOR BULLOCK CONTINUES MONTANA'S FIGHT AGAINST DARK MONEY BY ANNOUNCING LEADING-EDGE EXECUTIVE ORDER

## BULLOCK ORDERS DISCLOSURE OF DARK MONEY ELECTION SPENDING BY RECIPIENTS OF LARGE PUBLIC CONTRACTS

Governor Steve Bullock today announced that he will sign an executive order requiring the recipients of major government contracts to disclose dark money spending in elections.

**"Where Citizens United opened the door for a wave of dark money, Montana will again shine a light,"** said Governor Bullock. **"Montana will again stand up for openness and fairness in politics. Because Montanans deserve a government that works for them, and only them."**

Governor Bullock announced his decision to issue the executive order during a keynote address today at the Center for American Progress 2018 Ideas Conference. He will sign the executive order into law in Helena, Montana on Friday, June 8.

Under the executive order, government contractors who have spent over \$2,500 in the past two years in elections will be required to disclose their donations. The order covers contributions to so-called "dark money" groups that are otherwise not required to disclose their donors. The executive order applies to new contracts for goods over \$50,000 and new services contracts over \$25,000.

**"Tattooed across NASCAR drivers' jumpsuits and over every square inch of their cars are the logos of the companies sponsoring teams, underwriting the costs, and paying their salaries. Everyone can see who the drivers represent and who is footing the bill,"** Governor Bullock explained. **"If elected officials are going to be like NASCAR drivers – sponsored and supported by various special interests – we ought to at least know who's doing the sponsoring and spending."**

The order represents a significant new step for transparency in government. No similar executive order exists [at the federal level \(https://www.brennancenter.org/publication/requiring-government-contractors-disclose-political-spending\)](https://www.brennancenter.org/publication/requiring-government-contractors-disclose-political-spending), despite call:

Governor Bullock continues Montana's fight against dark money by ... <http://governor.mt.gov/Newsroom/governor-bullock-continues-mont...>  
from reformers and other transparency advocates.

**"This is just common sense. If the federal government won't implement these rules to protect federal taxpayers, then we'll do it here in Montana,"** Governor Bullock said.

**"I have always believed that one of our nation's great equalizers is that we all hold the exact, same amount of influence come election day. But, if people no longer think they have a shot at influencing elections and the activities of representative democracy, if they believe their voice doesn't count because it's not backed by an unlimited bank account, trust in the institutions of government disappears. And when trust in government disappears, it gives rise to the dangerous discourse and divisiveness we've seen everywhere from Washington, D. to our Facebook feeds,"** Governor Bullock continued.

Since taking office, Governor Bullock has fought to keep dark money out of politics and championed measures to increase transparency in elections.

As Attorney General, Bullock led the effort ([http://billingsgazette.com/news/state-and-regional/montana/state-urges-u-s-supreme-court-to-let-corrupt-practices/article\\_098883df-b438-5c73-94fd-63891bfc7201.html](http://billingsgazette.com/news/state-and-regional/montana/state-urges-u-s-supreme-court-to-let-corrupt-practices/article_098883df-b438-5c73-94fd-63891bfc7201.html)) to preserve Montana's 100-year-old Corrupt Practices Act, taking the case for the state's citizen democracy all the way to the U.S. Supreme Court. His office defended Montana's campaign finance limits and disclosure laws against a wave of lawsuits filed by American Traditions Partnership and other dark money groups.

Governor Bullock has been called "the biggest threat to Citizens United ([http://www.salon.com/2012/01/06/the\\_biggest\\_threat\\_to\\_citizens\\_united/](http://www.salon.com/2012/01/06/the_biggest_threat_to_citizens_united/))," and remains committed to ensuring Montana's elections are the most transparent in the nation.

Governor Bullock worked with Republicans and Democrats to pass the DISCLOSE Act to require the disclosure of donors to independent group spending money on state-level elections.

Montana has since received (<http://www.followthemoney.org/research/institute-reports/scorecard-essential-disclosure-requirements-for-contributions-to-state-campaigns-2016>) an "A" rating on the 2016 national scorecard for disclosure practices governing direct contributions to state candidates, state political parties, and committees that support or oppose any kind of statewide ballot question from [followthemoney.org](http://www.followthemoney.org) (<http://www.followthemoney.org/>).

Full text of Governor Bullock's remarks can be found at this [link](http://governor.mt.gov/Portals/16/060518%20Governor%20Bullock%20CAP%20Dark%20Money%20REMARKS%20AS%20PREPARED.pdf?ver=2018-c) (<http://governor.mt.gov/Portals/16/060518%20Governor%20Bullock%20CAP%20Dark%20Money%20REMARKS%20AS%20PREPARED.pdf?ver=2018-c>)

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