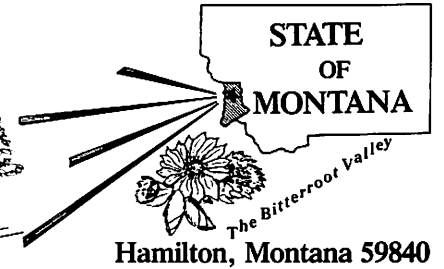
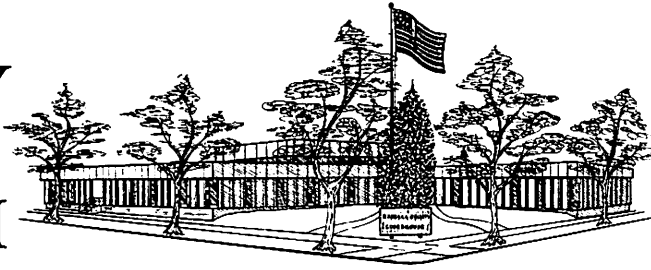


COUNTY OF RAVALLI



August 1, 2018

Honorable Tim Fox, Attorney General
Montana Department of Justice
P.O. Box 201401
Helena, MT 59620

Dear Attorney General Fox,

Recently a local citizen presented the Ravalli County Board of Commissioners with some concerning information (See Enclosed: 1) Montana in the Crosshairs: How Foreign/Out of State Money is Trying to Influence Treasure State Voters, 2) A Tangled Web Environmentalists Weave) 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.

Through misleading and disingenuous media campaigns, 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 devastating economic impact to our businesses and the emotional and physical harm to our citizens through legal challenges and delays in active forest and wildlife management.

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 inquiry 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


 Greg Chilcott, Member


 Doug Schallenberger, Member


 Chris A. Hoffman, Vice-Chairman


 Ray Hawk, Member

cc: files

Senator Steve Daines

Senator Jon Tester

Representative Greg Gianforte

Governor Bullock

Montana Association of Counties

Senator Fred Thomas

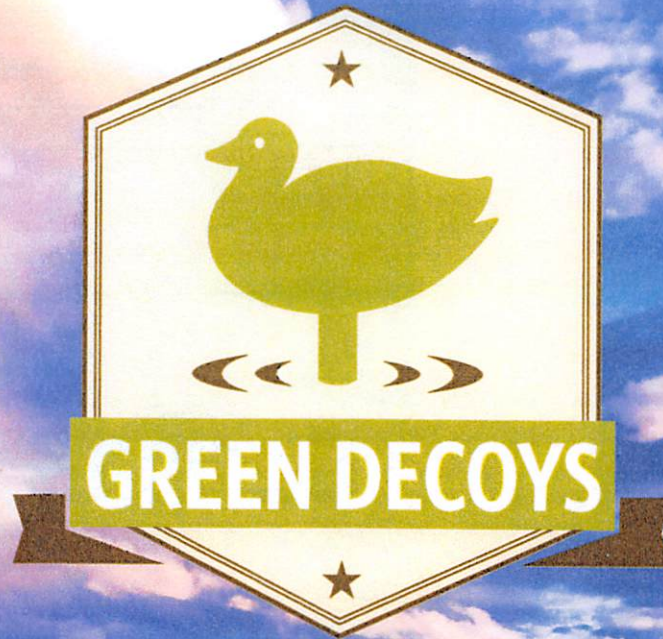
Senator Pat Connell

Representative Ron Ehli

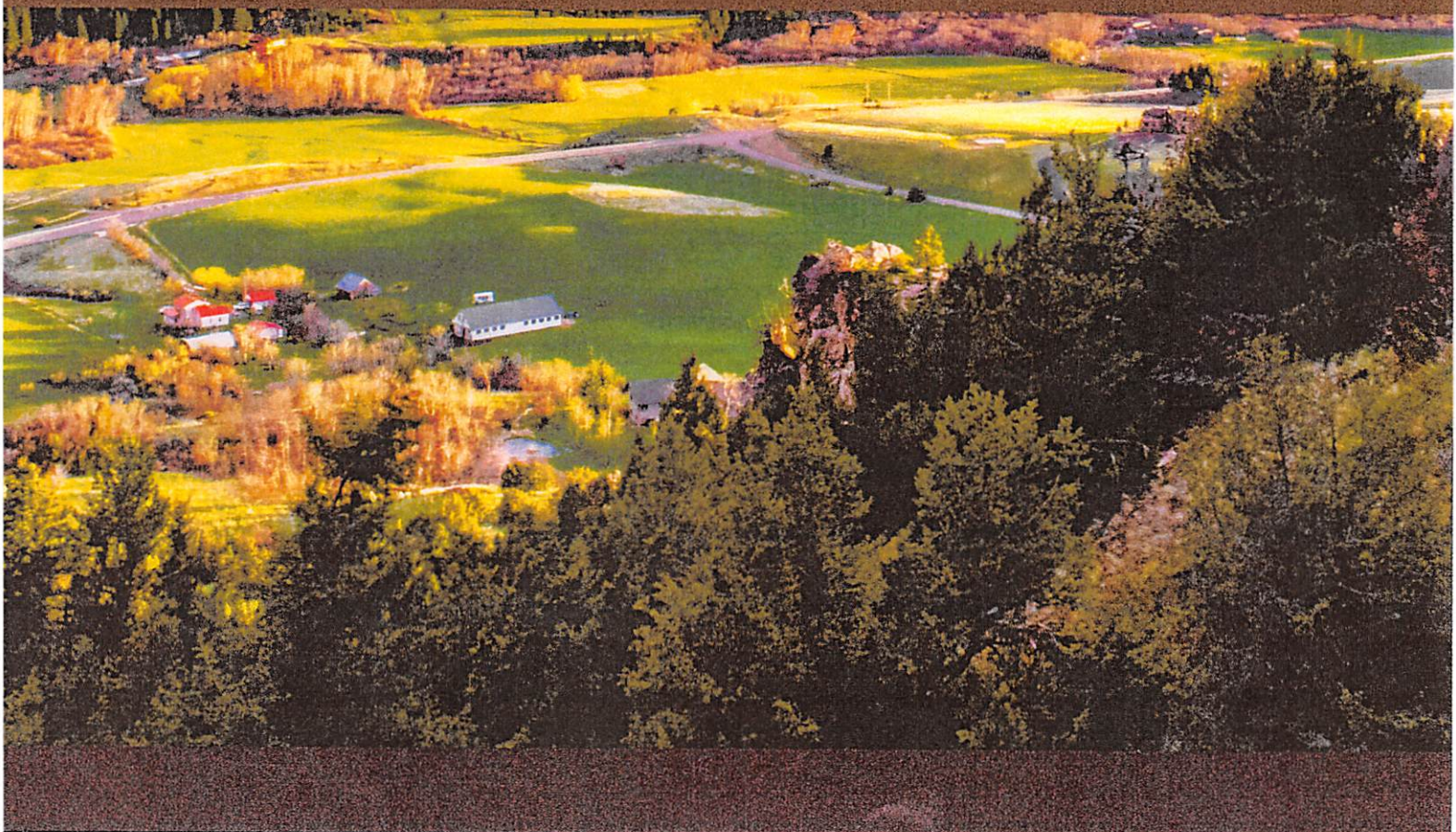
Representative Nancy Balance

Representative Ed Greef

Representative Theresa Manzella

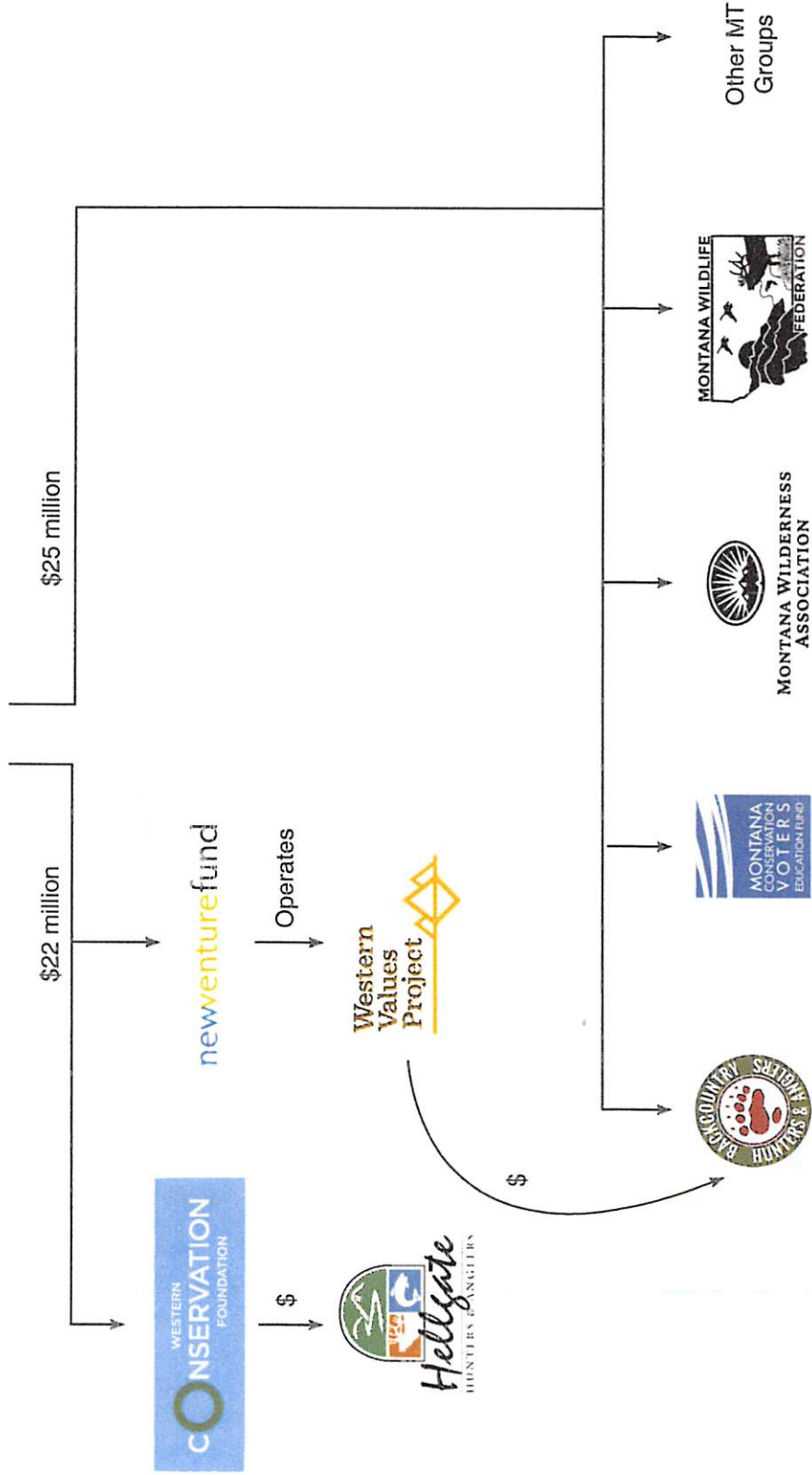


MONTANA IN THE CROSSHAIRS: HOW FOREIGN/OUT-OF-STATE MONEY IS TRYING TO INFLUENCE TREASURE STATE VOTERS





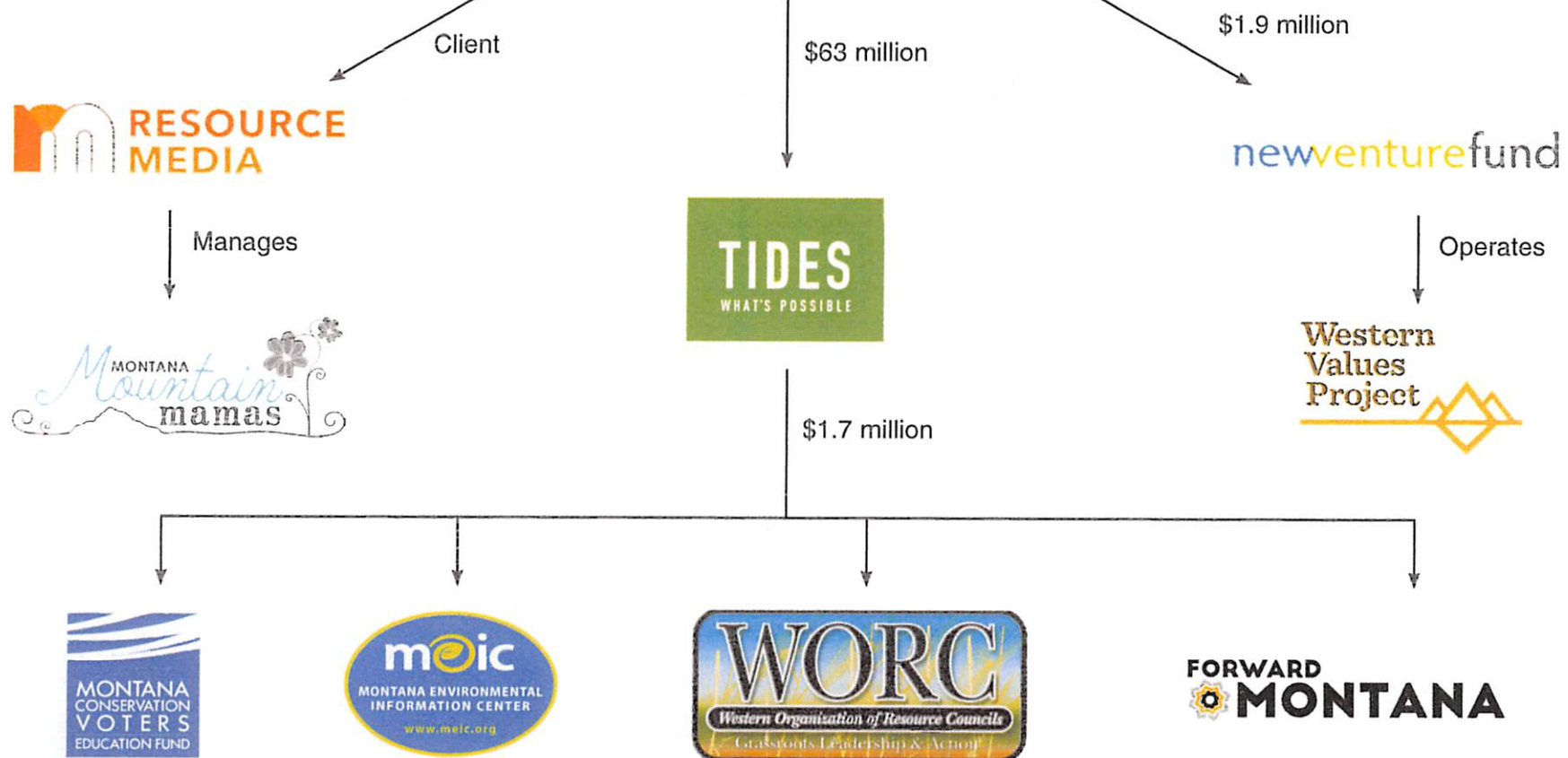
Hansjorg Wyss
(Swiss billionaire)



Note: Open Society Institute also funds NRDC, Earthjustice, and many other environmental groups. Foundation to Promote Open Society also funds Climate Policy Institute, Defenders of Wildlife, and others. Note: Wyss Foundation also funds Sierra Club and other environmental groups.

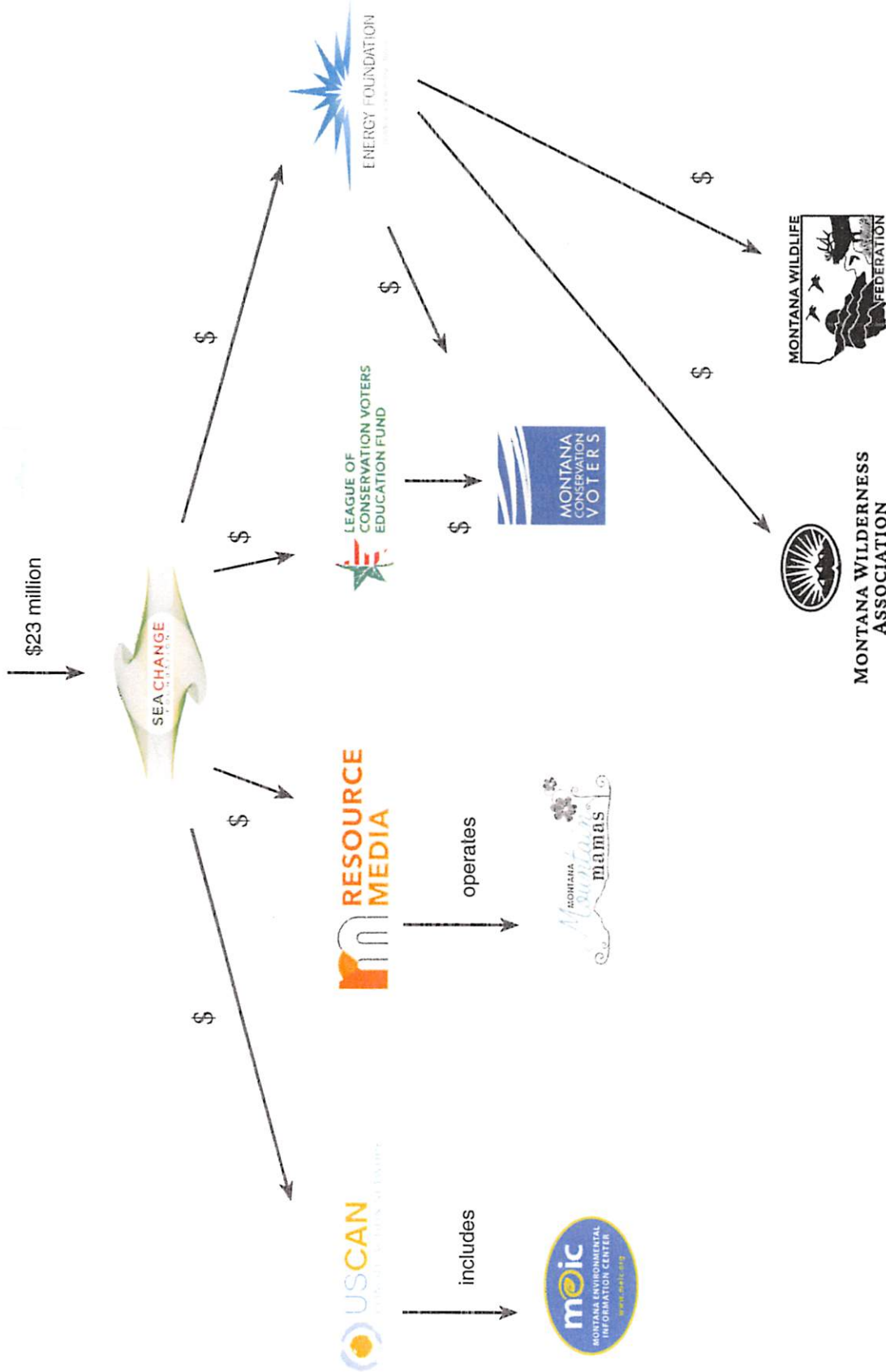


George Soros
(Hungarian billionaire)



Note: Open Society Institute also funds NRDC, Earthjustice, and many other environmental groups. Foundation to Promote Open Society also funds Climate Policy Institute, Defenders of Wildlife, and others.

KLEIN LTD
 (LINKED TO RUSSIAN \$\$)



Note: Klein Ltd. is a shell company based in Bermuda. Klein is operated out of the offices of Wakefield Quin, a law firm that also manages money for a number of Russian state oil interests. WQ was also linked to a Russian money laundering case in the British Virgin Islands. Sea Change Foundation also gives money to Sierra Club, NRDC, Energy Foundation, etc.



SUMMARY

Montana is being flooded with money from out of state to influence its politics and economy—money that may even be traceable back to Russia. The goal of this money is to promote a radical environmental agenda and weaken Montana’s economic sectors that utilize natural resources. Ultimately, these environmental benefactors want to stop logging, mining, modern farming and ranching, natural gas extraction, and other resource utilization in favor of land untouched by human activity.

The tens of millions of dollars flooding into Montana comes in several forms. Some groups are boilerplate environmental advocacy outfits. One group, Resource Media, acts as a PR firm for leftwing causes and runs the “Montana Mountain Mamas” project. Other cloak themselves as hunters and anglers to try to attract the support of Montana’s largest—and generally more conservative—voting bloc that might reject messages from openly environmental groups.

This report highlights three wealthy sources of money and the Montana groups they are linked to. Of particular concern is the possibility of foreign influence in environmental groups. On June 5, 2018, the U.S. House Committee on Natural Resources announced it was probing the relationship between the Natural Resources Defense Council (NRDC), a major U.S. environmental group, and the Chinese government.

In the first example below, a vehicle for Russian money passing through Bermuda is explained. Former Secretary of State Hillary Clinton has spoken about “phony environmental groups” that “were funded by the Russians.” And in 2014, the NATO secretary general warned of Russia secretly funding environmental groups to keep other countries dependent on Russian oil—which accounts for 40 percent of the Russian government’s income.¹

While investigation is needed to look into any foreign influence in Montana, there’s little doubt that foreign/out-of-state money is playing a big role in Montana. The exact depth of their collusion is unknown. Are these tax-exempt groups operating in accordance with nonprofit regulations?

RUSSIAN MONEY TRICKLING DOWN TO MONTANA?

In 2010 and 2011, a mysterious entity in Bermuda called Klein Ltd. gave \$23 million to the San Francisco-based Sea Change Foundation. Klein Ltd. appeared to only exist on paper; it is (or was) operated out of the law offices of Wakefield Quin in Hamilton, Bermuda. Wakefield Quin offers investment management services and has been linked to a number of Russian investment funds as well as a Russian money laundering case in the British Virgin Islands.²

The Sea Change Foundation, run by wealthy environmentalist Nat Simons (who commutes to work on his gas-guzzling yacht³), distributes money to a host of environmental groups. Recipients of Sea Change grants include Resource Media, The Energy Foundation, the League of Conservation Voters Education Fund, and the U.S. Climate Action Network.

Each of these groups has ties to Montana:

RESOURCE MEDIA acts a PR firm for a host of leftwing/ environmental groups. One of its projects is Montana Mountain Mamas, an organization that has recently popped up to chime in on public lands and other issues. In total, Sea Change has donated \$6.5 million to Resource Media since 2009.⁴ Resource Media has also received grants from The Brainerd Foundation (\$917,000), The Packard Foundation (\$3.3 million), and the Hewlett Foundation (\$5.9 million), and the Wilburforce Foundation (\$3.6 million). It’s unclear which of these groups, if any, is specifically funding Montana Mountain Mamas.

THE ENERGY FOUNDATION distributes money to a multitude of environmental groups involved in progressive politics. The Energy Foundation has given grants to Montana Conservation Voters, Headwaters Economics, Montana Wilderness Association, and Montana Wildlife Federation. The Energy Foundation also has given \$1.1 million to aforementioned Resource Media.

THE LEAGUE OF CONSERVATION VOTERS EDUCATION FUND gives grant money to the Montana Conservation Voters Education Fund. The League of Conservation Voters—a 501(c)(4) political affiliate of the Education Fund—gives money to Montana Conservation Voters. The League of Conservation Voters launched a dishonest \$244,000 ad campaign in Montana in 2018 attacking Rep. Greg Gianforte on public lands issues.⁵

THE U.S. CLIMATE ACTION NETWORK counts a number of environmental activist groups as members, including the Montana Environmental Information Center. MEIC has also received millions from out-of-state foundations such as the Brainerd Foundation and the Wilburforce Foundation that fund phony sportsmen groups that operate in Montana.

Sea Change also gives grant money to the Natural Resources Defense Council. The NRDC is the subject of a probe by the U.S. House Committee on Natural Resources into whether it should be registered as a “foreign agent” due to its apparently cozy relationship with the Chinese government.⁶ NRDC has lobbied in Montana, such as Backcountry Hunters & Anglers.

GEORGE SOROS

Hungarian billionaire George Soros is a well-known financier of progressive politics across the globe. His two major foundations, the Open Society Institute and the Foundation to Promote Open Society, have billions of dollars in assets.

Both organizations have given millions to the environmental movement. Open Society Institute funds NRDC, Earthjustice, and many other environmental groups. Foundation to Promote Open Society also funds Climate Policy Institute, Defenders of Wildlife, and others.

Both of Soros’ foundations have given millions to the **Tides Foundation** and **Tides Center**, a “dark money” network that

has operated in San Francisco since the 1970’s to promote progressive politics. Tides operates by creating internal projects that it “lends” its nonprofit status to; since the money is managed internally, it’s impossible to know exactly which Tides donors are funding which project.

The **Tides Foundation** has made grants to several Montana groups:

Montana Environmental Information Center (\$176,000)
Grants funded a campaign for a “coal-free Montana,” among other advocacy.

Western Organization of Resource Councils (\$1.5 million)
WORC has partnered with NRDC in litigation against coal mining.

Montana Conservation Voters Education Fund (\$50,000)

Forward Montana/Forward Montana Foundation (\$25,000)

Soros’ Open Society Foundation is also a client of Resource Media, which a leftwing PR firm that runs Montana Mountain Mamas. Soros’ Foundation to Promote Open Society has also given \$725,000 to Defenders of Wildlife, which advocates for wolf repopulation in Montana, to the chagrin of sportsmen and ranchers. Soros’ groups also support the aforementioned NRDC, which has testified in the Montana legislature and is being investigated for its ties to China.

HANSJORG WYSS

Swiss-born billionaire Hansjorg Wyss has made his mark known on the environmental movement—even if he has escaped much of the media attention that George Soros has attained. He gives few interviews to the media.

Wyss made his billions in the medical device industry through a company called Synthes. Shortly before Wyss sold Synthes to pharmaceutical conglomerate Johnson & Johnson, the Department of Justice charged Synthes and four executives under Wyss with offenses related to an off-label marketing scheme that led to the deaths of at least three people.⁷

Wyss has parked much of his wealth in three foundations: The Wyss Foundation (assets of \$2 billion), the Hansjorg Wyss Foundation (assets of \$300 million), and the Wyss

Medical Foundation (formerly the Wyss Peace Foundation) (assets of \$85 million). It is through these entities that he funds a variety of leftwing groups. Wyss has also given at least \$5 million to the Clinton Foundation, which has been accused of being a vehicle for foreign influence.⁸

The Wyss Foundation has made \$25 million in grants to Montana since 1999, according to public records. Recipients include:

BACKCOUNTRY HUNTERS AND ANGLERS

Led by progressive activist Land Tawney, tax records show this group gets the majority of its money from activist foundations, not sportsmen. Tawney's so-called Montana Hunters and Anglers received over \$1 million in dark money to influence the 2012 election.

MONTANA CONSERVATION VOTERS

EDUCATION FUND

MCV has received at least \$387,500 directly from the Wyss Foundation.

MONTANA WILDERNESS ASSOCIATION

The Wyss Foundation has given at least \$1.3 million to MWA.

MONTANA WILDLIFE FEDERATION

Wyss has given at least \$1.4 million to MWF.

The Wyss Foundation has also funded front organizations that operate or fund groups in Montana:

The New Venture Fund has received at least \$14.8 million from the Wyss Foundation. New Venture Fund is a "dark money" hub. NVF operates has launched over 100 internal "projects" that it lends its tax-exempt status to. These projects may appear to be grassroots organization in the Mountain West, when they are in fact operated out of Washington, D.C.

For instance, the so-called **Western Values Project**, an NVF front group, lists its address as a P.O. Box in Whitefish, Montana. However, a recent job posting for the Western Values Project listed the job location as D.C.

NVF raised over \$360 million in 2016. Based on NVF's setup, it is impossible to tell who is funding what projects.⁹ That includes the Western Values Project's six-figure ad campaign in December 2017 against Interior Secretary Ryan Zinke, as well as the \$113,000 NVF donated to **Backcountry Hunters and Anglers** in 2015.¹⁰

The Western Conservation Foundation has received at least \$7 million from the Wyss Foundation and gave \$1.6 million to Montana groups between 2014 and 2016. WCF operates a barebones website that notes its grant making is "by invitation only." WCF directs grants to groups such as Backcountry Hunters and Anglers (\$497,660), Hellgate Hunters and Anglers (\$24,000), Montana Wilderness Association (\$302,940), and the Montana Renewable Energy Association (\$92,428).¹¹

CONCLUSION

It is undeniable that millions of dollars from foreign/out-of-state interests has been pouring into Montana. While some of this money is traceable, it is easy for new front groups to sprout up with no discernible money trail for months, if not well over a year—if ever. In 2012, the Montana Hunters and Anglers PAC raised over a million dollars; efforts to trace this money led back to dark money groups.

As Montana has seen large ad campaigns over the past year and gears up for election season in 2018, it is worth asking where these groups are getting their money—and with whom they are colluding.

METHODOLOGY

We used public records (e.g. Form 990 tax returns) to construct financial links between organizations. Keep in mind that money is fungible.

Limitations: Information for 2017 is not readily available. Nonprofit organizations that ended their fiscal year on December 31, 2017 have until mid-November 2018 to file their tax returns. As such, some of the more recent money trail—such as who may have funded last year's ad campaigns in Montana—is not publicly available.

REFERENCES

¹<https://www.theguardian.com/environment/2014/jun/19/russia-secretly-working-with-environmentalists-to-oppose-fracking>

²For more information, see our "From Russia With Love?" report, downloadable at: https://www.biggreenradicals.com/wp-content/uploads/2015/12/Klein_Report_12-2015.pdf

³<http://freebeacon.com/politics/dem-mega-donor-commutes-to-work-on-gas-guzzling-yacht/>

⁴FoundationSearch.com data.

⁵<https://www.greatfalltribune.com/story/news/2018/03/14/conservationists-anti-greg-gianforte/423567002/>

⁶<https://naturalresources.house.gov/newsroom/documentsingle.aspx?DocumentID=404881>

⁷http://www.philly.com/philly/business/20091206_Legal_troubles_for_local_billionaire.html?c=r

⁸<https://www.clintonfoundation.org/press-releases/wyss-foundation-joins-bill-hillary-chelsea-clinton-foundation-no-ceilings-full>

⁹<http://freebeacon.com/issues/left-wing-front-groups-make-anti-trump-money-untraceable/>

¹⁰<https://westernvaluesproject.org/new-tv-ad-blasts-zinkes-embarrassing-scandals-and-monumental-failures/>

¹¹Source: Form 990 tax returns for 2014-16.

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