

RECEIVED**FEDERAL ELECTION COMMISSION****AUGUST 2, 2024 6:49 PM****OFFICE OF GENERAL COUNSEL****EAGERLAWPC**

P.O. Box 2264 | Bend, Oregon 97709 | (541) 323-5850 | eagerlawpc.com

**MUR 8145
SUPPLEMENT**

August 2, 2024

VIA FIRST CLASS MAIL AND EMAIL

Federal Election Commission
Office of Complaints Examination
& Legal Administration
Attn: Christal Dennis, Paralegal
1050 First Street, NE
Washington, DC 20463
cela@fec.gov
cdennis@fec.gov

Re: MUR 8145 / Wyden for Senate

Dear Federal Election Commission:

I am writing to supplement my complaint in the above-referenced matter with new information recently produced to me by the Oregon Department of Justice. I have enclosed the following documents:

1. **Oregon DOJ report summarizing its interview of Amelia Manlove, Compliance Director for the Democratic Party of Oregon (DPO).** According to the report, Manlove said DPO paid Diana Rogalle, longtime fundraising consultant for Senator Ron Wyden, \$2,000 "for her role in the [Nishad] Singh donation." This suggests DPO paid Rogalle a very small amount arising from her involvement in the Singh contribution. As provided in my original Complaint, Rogalle was introduced as "all things Ron Wyden" in correspondence arranging the contribution. Senator Wyden's office has taken the public position that Rogalle was working exclusively for DPO when she facilitated the contribution.
2. **Oregon DOJ report summarizing its interview of Nishad Singh.** According to the report, Singh told Oregon DOJ that chief federal FTX lobbyist Mark Wetjen personally asked Singh to make the \$500,000 contribution to the DPO. Wetjen explained to Singh, "donating to the DPO would really help FTX as a whole." According to the report, Singh remembered the contribution, nearly two years later, because Wetjen had never before asked him directly for a contribution to an FTX ally. FTX had no significant interest in Oregon state government; it had considerable interest in ensuring Finance Committee Chair Ron Wyden continued to take action to help FTX with its federal regulatory and tax concerns.

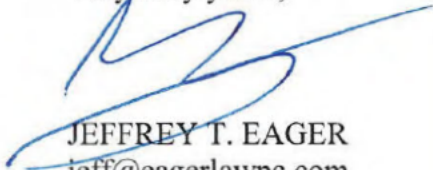
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3. **Oregon DOJ report summarizing its interview of Diana Rogalle.** According to the report, Rogalle contacted Susan McCue regarding a large donation from FTX to DPO "because Rogalle knew McCue was working for Senator Wyden's office and also for the FTX/Sam Bankman-Fried constellation." Note McCue denied via email to me that she ever worked for Wyden. However, she did work for then-Senate Democratic Leader Harry Reid. As such, it is reasonable to assume she had a relationship with Wyden as well as other Democratic senators in office during her tenure in Reid's office.
4. **Email from Aisling Coghlan, director of DPO's coordinated fundraising effort and Tim Leahy, Senator Wyden's political director.** This October 6, 2022, email included an excerpt of an April 2022 Politico story about the mistaken attribution of \$14 million in contributions to Prime Trust when in fact those contributions came from Sam Bankman-Fried and Singh, both of FTX. The email was sent before DPO falsely attributed the \$500,000 contribution to Prime Trust instead of Singh. In other words, DPO and Wyden's top campaign staffer were aware of the fact that Prime Trust was merely a bank for Singh before DPO nonetheless attributed the contribution to Prime Trust.

Very truly yours,

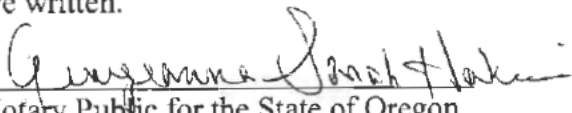

 JEFFREY T. EAGER
 jeff@eagerlawpc.com
 JTE

 State of Oregon } ss
 County of Deschutes }

On this 2nd day of August 2, 2024, before me, Georgeanna Hakimi, a Notary Public in and for said state, personally appeared before me Jeffrey T. Eager, known or identified to me to be the person whose name is subscribed to the within Instrument and signed and sworn to such Instrument.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal the day and year in this certificate first above written.




 Notary Public for the State of Oregon
 Residing at: 67553 Avonlea Circle, Bend
 Commission Expires: 01-24-2025



**DEPARTMENT OF JUSTICE
CRIMINAL JUSTICE DIVISION**

INVESTIGATION REPORT

CASE NO: CJD0265-23

CYBERTIP # / REFERENCE #: None

CJD UNIT: OC

CLASSIFICATION / CRIMES: Election Law Violations/Making a Contribution in a False Name (ORS 260.402)

INVESTIGATORS: SA Keri JASSO/SA Michael KORCEK

AAG / PROSECUTOR: AAG Toby TINGLEAF

REFER / REQUEST / ASSIST AGENCY: SoS-Elections Division

DATE / TIME OCCURRED: 10/04/2022

DATE / TIME CRIME REPORTED: 05/08/2023

DATE / TIME REPORT PREPARED: 02/22/2024

COUNTY / LOCATION OF OCCURRENCE: Marion County

SUMMARY OF REPORT: 02/13/24: This report summarizes the interview of Amelia MANLOVE.

This report documents my assignment to investigate a referral case from the Oregon Secretary of State (ORSOS) Elections Division (the "Elections Division") that indicates the likelihood that Nishad SINGH made a \$500,000 campaign contribution on October 4, 2022, to the DEMOCRATIC PARTY OF OREGON in a false name (ORS 260.232).

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Election Law Violations

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Deceased Subject: NA

Investigator: WHALEN, Alma
State of Oregon Secretary of State
Elections Program Manager
Compliance Specialist
Email: alma.whalen@sos.oregon.gov
Phone: [REDACTED]

Investigator: P.K. RUNKLES
State of Oregon Secretary of State
Elections Division
Chief Counsel

Victim: CITIZENS OF OREGON

Suspect: SINGH, Nishad
FTX TRADING LLC
Former Director of Engineering

Suspect: BANKMAN-FRIED, Sam
FTX TRADING LLC
CEO

IP: DEMOCRATIC PARTY OF OREGON (DPO)

Subjects: MORALES, Eddy
Democratic Party of Oregon
Treasurer

Person Interviewed: MANLOVE, Amelia
Democratic Party of Oregon
Compliance Director
Email: amelia@dpo.org
Phone: [REDACTED]

Subjects: COGHLAN, Aisling
Democratic Party of Oregon
Email: aisling@dpo.org
Phone: [REDACTED]

Subjects: MARTIN, Brad
Democratic Party of Oregon
Executive Director

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Witness: KURTZ, Eddie
Democratic Party of Oregon
Communications Director
Email: eddie@dpo.org
Phone: [REDACTED]

Business: PRIME TRUST LLC (PRIME TRUST)

Business: FTX TRADING LLC (FTX)

PM: REESE, Ezra
Elias Law Group
SINGH Counsel
Email: ereese@elias.law
Phone: [REDACTED]

Witness: McCUE, Susan
Former FTX Consultant
Email: susan@message-global.com
Phone: [REDACTED]

Witness: ROGALLE, Diana
Independent Contractor for DPO
Email: diana@ashmeadgroup.com
Phone: [REDACTED]

PM: WETJEN, Mark
Representative for FTX
Email: mark@ftx.us

PM: WILSON, Harry B.
DPO/MORALES Counsel
Email: harrywilson@markowitzherbold.com
Phone: [REDACTED]

PM: BORRUD, Hillary
The Oregonian
State Politics Reporter
Email: HBorrud@oregonian.com
Phone: [REDACTED]

PM: LEAHY, Tim
Email: tim@wydenforsenate.com

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PM: LANTZ, Keenan
Email: keenan@againstpandemics.org

PM: REIFF, Neil P.
Email: reiff@sandlerreiff.com

PM: BARDEN, Aaron
(Unknown affiliation)

PM: ROHRBACH, Andrew
Southern District of New York (SDNY)
Assistant United States Attorney (AUSA)

PM: NARAYANAN, Jenna
FTX Financials

PM: DAVIS, Clifford
Attorney for MANLOVE

SUMMARY:

In August 2023, Oregon Department of Justice (ODOJ) Special Agent (SA) Keri JASSO and SA Michael KORCEK were assigned to investigate the likelihood that Nishad SINGH, in affiliation with FTX Trading LLC (FTX), *knowingly made* a \$500,000 campaign contribution in a false name to the DEMOCRATIC PARTY OF OREGON (DPO) on October 4, 2022. SA Jasso was provided a volume of documents, referred to as the ELECTIONS DIVISION CASE FILE, that was shared by the ELECTIONS DIVISION, in order to prepare for this interview.

INVESTIGATION:

On February 13, 2024, SA JASSO and AAG Toby TINGLEAF, utilized the Teams Meeting application to interview Amelia MANLOVE, the current DEMOCRATIC PARTY OF OREGON (DPO) Compliance Director. Also present was her attorney, Clifford DAVIS. This interview was conducted for the purpose of discussing her direct knowledge of the events surrounding the SINGH campaign donation that is the focus of this investigation.

For foundation purposes, MANLOVE stated since approximately March 2022, she was hired as the Compliance Director, and among her various duties, she manages the bank accounts, oversees monies coming in and out, writes checks, prepares the reports with all the donation

details, completes general budgeting, carries out HR functions, and maintains the compliance records.

At the time of the campaign contribution by SINGH, as a general rule, large donors are contacted by a paid fundraiser. The paid fundraiser is responsible for arranging the donation and gathering the required donation information needed by MANLOVE as the Compliance Director. MANLOVE stated she was reliant, and it was the expectation upon the paid fundraiser for gathering the information. In the instance of the case against SINGH, she reached out on Diana ROGALLE, the paid fundraiser, prompting ROGALLE for the required information, but MANLOVE did not receive a response.

From information known to MANLOVE, ROGALLE was paid \$1000 dollars on each of two (2) invoices (total \$2000) for her role in the SINGH donation. However, she is not aware of the details of her contract with the DPO.

There was a tight timeline for state reporting of the SINGH donation, which is 7 days from the date the monies were deposited into the DPO account. There was a mandatory 10-day mailer that is required to be sent out by the DPO that lists their top 5 donors, over \$10K dollars in the current election cycle. At the time of the SINGH donation, this donation met the parameters, and thus was listed in the top 5 donors, reflecting PRIME TRUST LLC, as the donor of record.

When MANLOVE became aware of the SINGH Letter (Item 001), she stated in the SINGH letter it was stated that SINGH was the source of the donation. Subsequent to this information, MANLOVE ran it by the DPO Attorneys to confirm the letter and his statement. There is no state requirement in place to divulge this amendment within a time frame, however in the spirit of being fully transparent, the DPO released the amendment regarding the SINGH donation as soon as it was confirmed. MANLOVE added that when the DPO received the SINGH Letter, which was in approximately late October or early November 2022, the DPO was already facing a hefty fine.

MANLOVE never spoke to anyone related to FTX. In addition, MANLOVE doesn't recall ever speaking to ROGALLE, via telephone, in regard to the SINGH donation. However, MANLOVE and Aisling COGHLIN did speak to ROGALLE, via email, about compliance issues. MANLOVE stated COGHLIN told MANLOVE to use PRIME TRUST LLC. MANLOVE never reviewed the email from ROGALLE that stated it was preferred to use PRIME TRUST LLC.

MANLOVE recalled observing Mark WETJEN included on several emails, but did not speak to him or directly, either by phone or email. Prior to the donation, MANLOVE was expecting to see WETJEN or PROTECT OUR FUTURE PAC as being the donors. MANLOVE was surprised to see it was from PRIME TRUST LLC, as this was not what she was told prior to the donation.

In regard to the originator line on the wire transfer, it has been relayed that historically, within the DPO, the originator line does not have a specific function or uniform use. MANLOVE stated this field or line on the wire transfer receipt is a discretionary field used by the originator of the wire and she has even observed the notation: "DEMOCRATICE PARTY OF OREGON" used in that line, for the originator's records. MANLOVE added, in her role within the DPO, she does not look at it to determine the donor of record.

In regard to the SINGH donation, MANLOVE stated she had no reason to believe SINGH would be the donor, as she had never heard his name as a potential donor. MANLOVE's assumption at the time was that SINGH was arranging a donation for someone else. As we inquired about the wire itself, MANLOVE acknowledged that Signature Bank was the sender bank and it never occurred to her that the sender was treating PRIME TRUST LLC as their bank, as a bank was already listed.

When queried as to why she sent SINGH an email requesting confirmation of the donor of record, MANLOVE stated, in hindsight, she should have used the word "legal" in front of donor of record, but she thought it was implied. MANLOVE's intent, as there was some confusion on who the source of the donation was from, was to obtain the legal donor of record.

At the time of the SINGH donation, there was not a protocol in place to check or double check the source of the donation. MANLOVE stated she was fairly new at this job, and she was unaware querying the Oregon Business Registry would have given her some insight into PRIME TRUST LLC. Once the DPO got confirmation on using PRIME TRUST LLC, MANLOVE had no reason to believe anything else, and thus she filed the paperwork on day 5, post deposit. She added if she believed anything was off, she would have waited 2 more days, until the final 7-day deadline.

When asked about fact checking, MANLOVE stated she never queried or "Googled" SINGH or PRIME TRUST LLC. MANLOVE stated quite frankly, it was not her job to know the people, just the legal details for filing the records, and she thought she had the details sorted out. MANLOVE stated ROGALLE was responsible for relaying the correct information about the donor of record to MANLOVE. She added, no one at the DPO ever imagined that anyone would lie about the source of a donation. MANLOVE stated it was unprecedented and she has yet to understand the motivation behind it.

In regard to the SINGH donation, MANLOVE acknowledged that ROGALLE relayed the donor information to COGHLIN, and COGHLIN relayed it to MANLOVE that it "could" be PRIME TRUST LLC, prior to MANLOVE completing the paperwork.

MANLOVE stated she did not personally observe the Susan MCCUE Email (Item 001) to ROGALLE regarding the preference for using PRIME TRUST LLC. Thus, she did not review the email and the language in the email. Prior to seeing the email, MANLOVE stated she heard about the MCCUE email, and the email's description and content was discussed in general terms and spoke of in a less "wishy-washy" way than what the email actually turned out to be. MANLOVE stated she did finally observe the email during the Elections Division investigation in mid-2023.

On or about November 1, 2022, her boss, Brad MARTIN, forwarded the SINGH Letter regarding this confirmation that he was in fact the donor of record. MANLOVE pointed out, there was nothing sent to her from FTX or affiliates.

When asked, MANLOVE stated she was unaware if anyone from PROTECT OUR FUTURE PAC is in anyway associated with FTX. However, COGHLIN at one time referenced that the \$500,000 dollar donation came from PROTECT OUR FUTURE PAC. In regard to this, MANLOVE believes COGHLIN may have misspoken on the affiliation between the two entities.

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MANLOVE stated Brad MARTIN is the top manager within the DPO. MORALES was the Treasurer at the time of the SINGH donation and his role is described as more of a figure head than an active participant. MANLOVE added she was in contact daily with MARTIN regarding this donation, as MARTIN has the most influence on getting the correct data from ROGALLE.

MANLOVE became aware that SINGH was the source of the donation, on October 31, 2022, when MARTIN and MANLOVE discussed the SINGH letter.

MANLOVE did not ever speak to Keenan LANTZ or Susan MCCUE.

MANLOVE and DAVIS were both asked if they had anything additional to add before terminating the recording.

The referenced documents in this report have been previously attached to the Case Initiation Report.

DISPOSITION:

This investigation will continue.

ATTACHMENTS:

None. The recording was uploaded into evidence via Digital OnQ. (Item 007)



Keri Jasso #61566
Special Agent



Mark Williamson #35378
Asst. Special Agent in Charge (Supervisor)
Date: 6/19/2024



**DEPARTMENT OF JUSTICE
CRIMINAL JUSTICE DIVISION**

INVESTIGATION REPORT

CASE NO: CJD0265-23

CYBERTIP # / REFERENCE #: None

CJD UNIT: OC

CLASSIFICATION / CRIMES: Election Law Violations/Making a Contribution in a False Name (ORS 260.402)

INVESTIGATORS: SA Keri JASSO/SA Michael KORCEK

AAG / PROSECUTOR: AAG Toby TINGLEAF

REFER / REQUEST / ASSIST AGENCY: SoS-Elections Division

DATE / TIME OCCURRED: 10/04/2022

DATE / TIME CRIME REPORTED: 05/08/2023

DATE / TIME REPORT PREPARED: 06/05/2024

COUNTY / LOCATION OF OCCURRENCE: Marion County

SUMMARY OF REPORT: 06/05/24: This report summarizes the interview of Nishad SINGH.

This report documents my assignment to investigate a referral case from the Oregon Secretary of State (ORSOS) Elections Division (the "Elections Division") that indicates the likelihood that Nishad SINGH made a \$500,000 campaign contribution on October 4, 2022, to the DEMOCRATIC PARTY OF OREGON in a false name (ORS 260.232).

Deceased Subject: NA

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Investigator: WHALEN, Alma
State of Oregon Secretary of State
Elections Program Manager
Compliance Specialist
alma.whalen@sos.oregon.gov
Phone: [REDACTED]

Investigator: P.K. RUNKLES
State of Oregon Secretary of State
Elections Division
Chief Counsel

Victim: CITIZENS OF OREGON

PI: SINGH, Nishad
FTX TRADING LLC
Former Director of Engineering

Suspect: BANKMAN-FRIED, Sam
FTX TRADING LLC
CEO

IP: DEMOCRATIC PARTY OF OREGON

Witness: MORALES, Eddy
Democratic Party of Oregon
Treasurer

PM: MANLOVE, Amelia
Democratic Party of Oregon
Compliance Director
amelia@dpo.org
Phone: [REDACTED]

PM: COGHLAN, Aisling
Democratic Party of Oregon
aisling@dpo.org
Phone: [REDACTED]

Witness: MARTIN, Brad
Democratic Party of Oregon
Executive Director

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PM: RAMFJORD, Pers
Attorney for COGHLAN

Witness: KURTZ, Eddie
Democratic Party of Oregon
Communications Director
Email: eddie@dpo.org
Phone: [REDACTED]

Business: PRIME TRUST LLC (PRIME TRUST)

Business: FTX TRADING LLC (FTX)

Business: ALAMEDA RESEARCH

PM: REESE, Ezra
Elias Law Group
SINGH Counsel
Email: ereese@elias.law
Phone: [REDACTED]

PM: McCUE, Susan
Former FTX Consultant
Email: susan@message-global.com
Phone: [REDACTED]

PM: ROGALLE, Diana
Independent Contractor for DPO
Email: diana@ashmeadgroup.com
Phone: [REDACTED]

PM: KAUFMAN, Sam
Attorney for ROGALLE

Witness: WETJEN, Mark
Representative for FTX
Email: mark@ftx.us

PM: WILSON, Harry B.
DPO/MORALES Counsel
Email: harrywilson@markowitzherbold.com
Phone: [REDACTED]

PM: BORRUD, Hillary
The Oregonian

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State Politics Reporter
Email: HBorrud@oregonian.com
Phone: [REDACTED]

PM: LEAHY, Tim
Email: tim@wydenforsenate.com

PM: LANTZ, Keenan
Email: keenan@againstpandemics.org

PM: REIFF, Neil P.
Email: reiff@sandlerreiff.com

PM: BARDEN, Aaron
(Unknown affiliation)

PM: NARAYANAN, Jenna
FTX Financials
Email: [REDACTED]
Phone: [REDACTED]

PM: SANDOWSKY, Michael
FTX

PM: BANKMAN-FRIED, Gabe
FTX

PM: SALAME, Ryan
FTX

PM: HUYNH, David
FTX

PM: PESHWAMI, Jayesh
FTX

Witness: BUCKLAND, Christa
Former DPO employee

PM: FRABRIZIO
Associated with FTX

PM: FLYNN, Kerrick

SUMMARY:

In August 2023, Oregon Department of Justice (ODOJ) Special Agent (SA) Keri JASSO and SA Michael KORCEK were assigned to investigate the likelihood that Nishad SINGH, in affiliation with FTX Trading LLC (FTX), *knowingly made* a \$500,000 campaign contribution in a false name to the DEMOCRATIC PARTY OF OREGON (DPO) on October 4, 2022. SA JASSO was provided a volume of documents, referred to as the ELECTIONS DIVISION CASE FILE (ITEM 001), which was shared by the ELECTIONS DIVISION, in order to prepare for this interview.

INVESTIGATION:

On June 5, 2024, SA JASSO and AAG Toby TINGLEAF, utilized the Teams Meeting application to interview Nishad SINGH, a former senior FTX executive. This interview was conducted for the purpose of discussing SINGH's direct knowledge and involvement in the events surrounding the campaign contribution that is the focus of this investigation. At SINGH's request, this meeting was not recorded.

Interview of Nishad SINGH

On June 5, 2024, SA JASSO and AAG TINGLEAF utilized TEAMS Meeting to interview SINGH. Also present: Russel CAPONE, Anu DHILLON, and Andrew GOLDSTEIN, all legal representation for SINGH. The following is a summary of interview, and not meant to represent his statements verbatim.

For foundation purposes, SINGH stated prior to working at ALAMEDA RESEARCH or FTX TRADING LLC, he had a personal/high school relationship with Gabe BANKMAN-FRIED and met Sam BANKMAN-FRIED through that relationship. Prior to 2019, he was employed by ALAMEDA RESEARCH, a crypto exchange company, and then in 2020, began working for FTX TRADING, LLC (FTX) full time. As it relates to donating monies, while working for FTX, SINGH fully embraced the effective altruism (hereafter referred to as EA) ideology that the leaders at FTX had supported and incorporated into their daily culture and financial contribution activities. In short, SINGH explained that EA was "doing good by giving money." And further stated, "giving money where it could do the most good." In regard to the EA, SINGH stated he was more or less "cause agnostic," but did have an affinity for Artificial Intelligence safety and animal welfare initiatives. SINGH further stated he was deferential to initiatives outside of that.

At some point, the EA supported causes shifted to supporting political based causes, both at the federal and state level. When S. BANKMAN-FRIED, and G. BANKMAN-FRIED were working at JANE STREET, a trading firm, they had begun making inroads into Washington, DC, and political channels. Those in roads solidified relationships with Sean CASTEN (D-IL. 6th

District), U.S. Congressman, who supported clean environmental issues, and Michael SADOWSKY, head of PROTECT OUR FUTURE Super Political Action Committee (PAC). SINGH also mentioned that Barbara BANKMAN-FRIED was supporting MIND THE GAP, a left-wing super PAC dedicated to helping Democratic political candidates win elections.

As a whole, FTX leadership accepted SADOWSKY, G. BANKMAN-FRIED, and Ryan SALAME, as advisors for EA supported programs. And that support, in short, focused on political based causes, to include influencing ballot decisions. G. BANKMAN-FRIED became a contracted consultant and advisor to SINGH with a focus on identifying EA focused causes and projects for the purpose of making donations, directed to causes in the political arena. For this purpose, SINGH and G. BANKMAN-FRIED had some conversations about what causes to back, but for the most part, SINGH was deferential and trusted G. BANKMAN-FRIED completely. SINGH would receive a request to donate, usually by email, and would confirm money transfers from his accounts to the recipient, often without knowledge of who the recipient was other than the name contained in the money transfer confirmation.

LOANS VS DONATIONS

SINGH had two primary accounts used for making donations: Wells Fargo and Prime Trust. All monies in SINGH'S personal Wells Fargo bank account had both personal compensation funds and money transfers from ALAMEDA RESEARCH accounts. The funds transferred from ALAMEDA, SINGH described as "loans," that SINGH was to pay back. For purposes of making large donations, SINGH was advised to open a PRIME TRUST bank account, as his personal Wells Fargo account was not authorized to make larger withdrawals and wire transfers.

G. BANKMAN-FRIED and SADOWSKY would advise and identify which causes to financially support. The focus was on EA but included other political causes. Ryan SALAME, and FREBRIZIO, had access to SINGH'S accounts. FREBRIZIO opened a few accounts for SINGH. Further, SALAME would initiate the outgoing transfers. SALAME was described as a close associate of S. BANKMAN-FRIED and is described as in charge of all FTX banking related to political donations. SALAME basically had a "mastery" knowledge of FTX bank related areas. FREBRIZIO is described as a "proxy" for SALAME.

Agent Note: May 28, 2024: RYAN SALAME was sentenced to 90 months in prison. SALAME previously pled guilty to conspiracy to make unlawful political contributions and defraud the Federal Election Commission and conspiracy to operate an unlicensed money transmitting business. These charges were filed by the Southern District of New York, and related to the FTX investigation that was investigated in that jurisdiction.

When SINGH was preparing his taxes in 2022, he reviewed the donations he made that tax year, and noticed ALAMEDA RESEARCH was "funneling" money through his financial accounts. SINGH was trying to determine what were loans and what was compensation deposited into his accounts. When he spoke to Jayesh PESHWAMI about this, PESHWAMI preferred SINGH not refer to it as "funneling," rather preferred they be referred to as loans. SINGH

understood some of the monies in his account were "loans" from ALAMEDA RESEARCH, that Singh would be responsible to pay back.

When the EA donations/contributions were being completed, SINGH stated he would receive an email from one of his banks requesting confirmation on a wire transfer. These transfers were initiated by SALAME, and sometimes SADOWSKY, and contained detailed information regarding where and how much to donate monies to and required confirmation from SINGH to complete the transfer. At the time, SINGH did not actually know how much ALAMEDA RESEARCH monies were co-mingled with his personal monies, but nonetheless, SINGH was donating monies, via outgoing wire transfers, from the same financial account.

From this investigation, it was understood that some of the monies SINGH donated were his personal funds and some were loans from ALAMEDA or FTX. SINGH was asked to describe inter company or founder loans, as they were different. SINGH is unaware how they were documented, and they were not really loans, but he understood they had to be paid back; some were documented, some were not. Whether documented or not, SINGH understood he had to pay back the monies from his personal assets.

SIGNAL CHAT THREAD

During his employment with FTX, SINGH confirmed he was part of a Signal Chat thread that was used for operational elements of the EA donations/contributions, such as wire transfer instructions, and not used for the "why or where" to donate. Other participants were SALAME, S. BANKMAN-FRIED, G. BANKMAN-FRIED, SADOWSKY, and Keenan LANTZ.

KERRICK FLYNN DONATION APRIL 2022

For foundation, in April 2022, there was a \$14 million dollar donation made to the Kerrick FLYNN Campaign, of which \$13 Million was donated by S. BANKMAN-FRIED, and \$1 Million by SINGH. For this donation, SINGH stated G. BANKMAN-FRIED and SADOWSKY selected 2 Super PACS upon which to donate. SINGH does not know how the FLYNN campaign was selected to receive the donated monies other than FLYNN followed EA. Nor did SINGH know how PRIME TRUST LLC was recorded as the donor of record.

DEMOCRATIC PARTY OF OREGON (DPO) DONATION, OCTOBER 2022

Prior to SINGH making this donation, SINGH stated he had limited information as to how and why this donation to the DPO came together within the purview of his EA advisors. To set this in motion, SINGH recalls getting contacted directly by Mark WETJEN, who SINGH described as spearheading FTX US, based in Washington, DC. SINGH advised this request, to make a donation, was different than requests in the past, as SINGH had never been contacted by WETJEN to donate monies. SINGH recalled he had only met WETJEN in person, maybe once or twice, and

their working relations were almost never. However, he was aware that WETJEN and S. BANKMAN-FRIED were close associates, and he believed WETJEN had authority to make contribution requests.

So at the time of the donation, around October 2022, WETJEN contacted SINGH directly and inquired if SINGH would donate \$500,000 dollars to the DPO. WETJEN described that donating to the DPO would really help FTX as a whole. During his responses in this interview, SINGH was surmising his actions, as he knows he did agree to send the money. SINGH did have some recollection of this donation, as WETJEN had never before reached out to SINGH to donate monies. So again, surmising his actions, SINGH stated he would have verbally and electronically confirmed the donation, sent the donation via wire transfer, from his PRIME TRUST bank account, and noted that SINGH was the donor. The PRIME TRUST account was described as co-mingled money from ALAMEDA RESEARCH and SINGH's personal compensation. SINGH added that he did not really know how or why the DPO was selected, but he did agree to the donation and followed the same steps he did when he donated monies to other entities.

When asked and shown a typed, unsigned letter that was sent to and received by DPO on October 28, 2022, referred to in previous reports as the "SINGH LETTER," (Item 001/ELECTIONS DIVISION CASE FILE) SINGH stated he did not know it's origin, he did not type it, and further never spoke to anyone at the DPO before, during, or after the wire transfer was sent.

When asked and shown an email communication (Item 001/ELECTIONS DIVISION CASE FILE) that was sent from Amelia MANLOVE to SINGH, and Diana ROGALLE, on October 6, 2022, attempting to ascertain the donor or record for the DPO reporting requirements, SINGH reviewed the email and stated he does not recall seeing the email, and again stated he never spoke to anyone at the DPO.

SNGH was also shown an email, dated October 7, 2022, from Susan McCUE to Diana ROGALLE, that said in summary, "SINGH prefers PRIME TRUST. though not strongly..." SINGH stated he has never seen the email and does not know how this information was forwarded as the correct action to take. SINGH added that if asked at the time about the donor of record, he would have stated that he, not Prime Trust, was the donor or record. There was no motivation to falsify where the donation came from as one purpose of the donations was to gain favor or benefit to FTX and SINGH. When asked about Susan McCUE, he stated he does not know her and has never spoken to her. (The email referenced has previously been submitted into evidence as Item 001).

On Friday, October 28, 2022, while participating in an FTX group Signal chat (discussed above), SINGH learned there was a problem with the donor of record reported by the DPO. While observing messages in the FTX group Signal chat, SINGH recalled observing a topic of discussion regarding the fact that PRIME TRUST LLC was erroneously reported as the donor of record for the \$500,000 contribution. SINGH recalls responding to the text string that the contribution was from him and was not sure how the error occurred. SINGH dismissed it as a clerical error, and at the time thought it "hilariously funny" that the error occurred. At some point in the Signal chat

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discussion, Keenan LANTZ, described as an FTX organizer of donations, wire transfers, and records, stated he would fix the issue.

SINGH stated the contribution to the DPO was made by him and he intended and assumed the contribution would have been attributed to him as the donor of record.

SINGH stated he does not know Diana ROGALLE, Jenna NARAYANAN, Ron WYDEN, or Tim LEAHY.

SINGH had nothing else to add and the interview was terminated.

Keri Jasso #61566

Special Agent



Mark Williamson #35378

Asst. Special Agent in Charge (Supervisor)

Date: 6/21/2024

DISPOSITION:

This investigation will continue.

ATTACHMENTS:

None.



**DEPARTMENT OF JUSTICE
CRIMINAL JUSTICE DIVISION**

INVESTIGATION REPORT

CASE NO: CJD0265-23

CYBERTIP # / REFERENCE #: None

CJD UNIT: OC

CLASSIFICATION / CRIMES: Election Law Violations/Making a Contribution in a False Name (ORS 260.402)

INVESTIGATORS: SA Keri JASSO/SA Michael KORCEK

AAG / PROSECUTOR: AAG Toby TINGLEAF

REFER / REQUEST / ASSIST AGENCY: SoS-Elections Division

DATE / TIME OCCURRED: 10/04/2022

DATE / TIME CRIME REPORTED: 05/08/2023

DATE / TIME REPORT PREPARED: 04/04/2024

COUNTY / LOCATION OF OCCURRENCE: Marion County

SUMMARY OF REPORT: 04/04/24: This report summarizes the interview of Diana ROGALLE.

This report documents my assignment to investigate a referral case from the Oregon Secretary of State (ORSOS) Elections Division (the "Elections Division") that indicates the likelihood that Nishad SINGH made a \$500,000 campaign contribution on October 4, 2022, to the DEMOCRATIC PARTY OF OREGON in a false name (ORS 260.232).

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Deceased Subject: NA

Investigator: WHALEN, Alma
State of Oregon Secretary of State
Elections Program Manager
Compliance Specialist
alma.whalen@sos.oregon.gov
Phone: [REDACTED]

Investigator: P.K. RUNKLES
State of Oregon Secretary of State
Elections Division
Chief Counsel

Victim: CITIZENS OF OREGON

Suspect: SINGH, Nishad
FTX TRADING LLC
Former Director of Engineering

Suspect: BANKMAN-FRIED, Sam
FTX TRADING LLC
CEO

IP: DEMOCRATIC PARTY OF OREGON (DPO)

Subjects: MORALES, Eddy
Democratic Party of Oregon
Treasurer

PM: MANLOVE, Amelia
Democratic Party of Oregon
Compliance Director
amelia@dpo.org
Phone: [REDACTED]

PM: COGHLAN, Aisling
Democratic Party of Oregon
aisling@dpo.org
Phone: [REDACTED]

Subjects: MARTIN, Brad
Democratic Party of Oregon
Executive Director

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PM: RAMFJORD, Pers
Attorney for COGHLAN

Witness: KURTZ, Eddie
Democratic Party of Oregon
Communications Director
Email: eddie@dpo.org
Phone: [REDACTED]

Business: PRIME TRUST LLC (PRIME TRUST)

Business: FTX TRADING LLC (FTX)

PM: REESE, Ezra
Elias Law Group
SINGH Counsel
Email: ereese@elias.law
Phone: [REDACTED]

PM: McCUE, Susan
Former FTX Consultant
Email: susan@message-global.com
Phone: [REDACTED]

Person Interviewed: ROGALLE, Diana
Independent Contractor for DPO
Email: diana@ashmeadgroup.com
Phone: [REDACTED]

PM: KAUFMAN, Sam
Attorney for ROGALLE

Witness: WETJEN, Mark
Representative for FTX
Email: mark@ftx.us

PM: WILSON, Harry B.
DPO/MORALES Counsel
Email: harrywilson@markowitzherbold.com
Phone: [REDACTED]

PM: BORRUD, Hillary
The Oregonian
State Politics Reporter

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Email: HBorrud@oregonian.com
Phone: [REDACTED]

PM: LEAHY, Tim
Email: tim@wydenforsenate.com

PM: LANTZ, Keenan
Email: keenan@againstpandemics.org

PM: REIFF, Neil P.
Email: reiff@sandlerreiff.com

PM: BARDEN, Aaron
(Unknown affiliation)

PM: NARAYANAN, Jenna
FTX Financials
Email: [REDACTED]
Phone: [REDACTED]

PM: SANDOWSKY, Michael
FTX

PM: BANKMAN-FRIED, Gabe
FTX

PM: SALAME, Ryan
FTX

PM: HUYNH, David
FTX

PM: PESHWAMI, Jaesh
FTX

PM: BUCKLAND, Christa
Former DPO employee

SUMMARY:

In August 2023, Oregon Department of Justice (ODOJ) Special Agent (SA) Keri JASSO and SA Michael KORCEK were assigned to investigate the likelihood that Nishad SINGH, in

affiliation with FTX Trading LLC (FTX), *knowingly made* a \$500,000 campaign contribution in a false name to the DEMOCRATIC PARTY OF OREGON (DPO) on October 4, 2022. SA Jasso was provided a volume of documents, referred to as the ELECTIONS DIVISION CASE FILE, which was shared by the ELECTIONS DIVISION, in order to prepare for this interview.

INVESTIGATION:

On April 4, 2024, SA JASSO and AAG Toby TINGLEAF, utilized the Teams Meeting application to interview Diana ROGALLE, a former contractor for the DPO. Also present was her attorney, Sam KAUFMAN. This interview was conducted for the purpose of discussing her direct knowledge of the events surrounding the campaign contribution that is the focus of this investigation. At ROGALLE's request, this meeting was not recorded.

For foundation purposes and how she came into playing a role in the SINGH donation, ROGALLE stated she was a paid contractor, focusing on political fundraising for the DPO. ROGALLE was focusing on securing federal and non-federal donations. ROGALLE described the SINGH donation as a non-federal campaign donation. ROGALLE has known Susan McCUE for quite some time, as they have both established careers within political channels. ROGALLE knew McCUE was working for Senator WYDEN's office and also working with the FTX/Sam BANKMAN-FRIED constellation. ROGALLE believed McCUE was a political advisor for S. BANKMAN-FRIED and could speak for him regarding donations.

ROGALLE stated McCUE reached out to her and indicated the BANKMAN-FRIED constellation would be making a political contribution, on the non-federal side, to the DPO. For the purpose of managing this donation, ROGALLE stated she spoke to Aisling COGHLIN in advance of the donation. ROGALLE stated she also spoke to Amelia MANLOVE, via email, as parties involved were trying to determine the correct donor of record.

In this regard, when the DPO was trying to get the correct information, ROGALLE would not classify this donation, or the amount, as out of the ordinary, and no "red flags" were raised, even when the message from McCUE was relayed that, "SINGH prefers PRIME TRUST, but not strongly." ROGALLE added that she had not heard the name Nishad SINGH prior, in any conversations she had with McCUE or others.

At some point, ROGALLE became aware the DPO was having some confusion as to who the donor of record would be. For the purposes of helping to clear it up, she emailed SINGH, but did not receive any response from SINGH. ROGALLE was introduced to WETJEN, via email, but that was the extent of the communication with him, and so never spoke to WETJEN. When asked, ROGALLE stated she does not know Ryan SALAME.

As far as helping to clear up the confusion, ROGALLE acknowledged that she forwarded the McCUE email, to Amelia MANLOVE, relaying that "Nishad prefers PRIME TRUST, though not strongly."

During the time when the DPO was trying to amend the record, McCUE spoke to ROGALLE, regarding amending the reporting, however, ROGALLE advised her that it was not her role to correct the record, as she was not a compliance officer. Also, during this contact between ROGALLE and McCUE, it was relayed that McCUE was frustrated with the situation and was questioning if the parties on the FTX side of the donation knew what they were doing.

ROGALLE has never had communications with Gabe BANKMAN-FRIED, Keenan LANTZ, or Nishad SINGH. When asked, ROGALLE stated she has known Jenna NARAYANAN for quite some time, and that she was part of the S. BANKMAN-FRIED constellation. ROGALLE stated NARAYANAN called her at the end of October 2022, and stated NARAYANAN wanted to fix the error in reporting. ROGALLE did not have any other details to offer about this communication, as she stated she was not involved in correcting any records.

ROGALLE stated she also had a conversation with Brad MARTIN, and the message from the DPO was that they followed protocols in trying to establish the correct donor of record. ROGALLE did add that the DPO needed to vet the donor of record on their end of things.

ROGALLE did not have any other information to offer, and the interview was terminated.

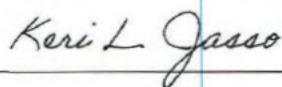
The referenced documents in this report have been previously attached to the Case Initiation Report.

DISPOSITION:

This investigation will continue.

ATTACHMENTS:

None.



Keri Jasso #61566
Special Agent



Mark Williamson #35378
Asst. Special Agent in Charge (Supervisor)

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Date: _____

From: Aisling Coghlan <aisling@dpo.org>
Sent: Thur 10/6/2022 7:13:45 PM (UTC)
To: Tim Leahy [REDACTED]
Subject: Prime Trust

This is the part that was interesting to me:

“Revealed: The \$14M mystery behind a new crypto super PAC” “The billionaire founder of a global crypto exchange made an anonymous \$14 million contribution to a super PAC. Only it wasn’t anonymous. And it wasn’t \$14 million. Protect Our Future — a super PAC that’s spent millions [supporting candidates “who take a long term view on policy planning”](#) — disclosed \$14 million in contributions from the Nevada-based fintech Prime Trust LLC in its quarterly filing on Friday. After POLITICO reported that Prime Trust was the source of the funds — as reflected in the super PAC’s filing with the Federal Election Commission — a spokesperson for Prime Trust reached out to say that the money wasn’t actually from the company. “Prime Trust was identified in the PAC filing solely because the transferred funds were held in an account under Prime Trust’s name for the benefit of a specific customer, and Prime Trust originated the wire transfer at the direction of that customer,” said Erin Holloway, president of global marketing for Prime Trust, in a statement. “This ministerial function is commonplace in both traditional and digital custodial relationships and should not be misconstrued as controlling or otherwise directing the flow of funds.” So who is actually the source of the funds — and why the obfuscation in the first place? After questions from POLITICO, a spokesperson for Protect Our Future said that Sam Bankman-Fried, 30-year-old founder of the crypto exchange FTX and emergent political megadonor, was responsible for \$13 million, while FTX’s engineering director, Nishad Singh, donated the other \$1 million. [Politico, 4/19/[2022](#)]

Aisling Coghlan
aisling@dpo.org
Pronouns: she/her/hers
Phone: [REDACTED]