

HP261957
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Attorney for State

Arraignment is set August 26, 2026, at 9:00 AM before the Honorable Mike Menahan
Brent Flowers, Counsel for Defendant.

**MONTANA FIRST JUDICIAL DISTRICT COURT
LEWIS AND CLARK COUNTY**

STATE OF MONTANA,

Plaintiff,

No. ADC 2026-225

- vs -

AMENDED INFORMATION

MICHAEL MORGAN,
AKA MARC LUBASZKA

Defendant.

Count I - TAMPERING WITH PUBLIC RECORDS OR INFORMATION, a felony, in violation
of Section(s) 45-7-208, MCA, alleged to have occurred on or about May 1, 2026

Count II - TAMPERING WITH PUBLIC RECORDS OR INFORMATION, a felony, in
violation of Section(s) 45-7-208, MCA, alleged to have occurred on or about May 4, 2026

Count III - TAMPERING WITH PUBLIC RECORDS OR INFORMATION, a felony, in
violation of Section(s) 45-7-208, MCA, alleged to have occurred on or about May 20, 2026

Count IV - THEFT, a felony, in violation of Section(s) 45-6-301(2), MCA, alleged to have
occurred on or about May 7, 2026

Count V - MONEY LAUNDERING, a felony, in violation of Section(s) 45-6-341, MCA,
alleged to have occurred on or about May 7, 2026

STATE OF MONTANA)
 :ss.
County of Lewis and Clark)

KEVIN DOWNS, County Attorney for Lewis and Clark County, states the defendant
committed the following offense(s) in Lewis and Clark County, Montana.

Count I

The facts constituting the offense are that on or about the 1st day of May, 2026, the above-named defendant committed the offense of TAMPERING WITH PUBLIC RECORDS OR INFORMATION, a felony in violation of Section 45-7-208, MCA, in that the defendant knowingly made, presented, or used any record, document, or thing knowing it to be false and with purpose that it be taken as a genuine part of information or records referred to in subsection (1)(a)--that is, any record, document, legislative bill or enactment, or thing belonging to or received, issued, or kept by the government for information or record, to wit: providing a fake identification to obtain a P.O. box.

Count II

For a further and separate cause of action, being a different offense than that otherwise set forth herein, the facts constituting the offense contained in Count II are that on or about the 4th day of May, 2026, the above-named defendant committed the offense of TAMPERING WITH PUBLIC RECORDS OR INFORMATION, a felony in violation of Section 45-7-208, MCA, in that the defendant knowingly made a false entry in or false alteration of any record, document, legislative bill or enactment, or thing belonging to or received, issued, or kept by the government for information or record or required by law to be kept by others for information of the government, to wit: submitting fake lease/rental agreement to obtain identification card.

Count III

For a further and separate cause of action, being a different offense than that otherwise set forth herein, the facts constituting the offense contained in Count III are that on or about the

1 20th day of May, 2026, the above-named defendant committed the offense of TAMPERING
2 WITH PUBLIC RECORDS OR INFORMATION, a felony in violation of Section 45-7-208,
3 MCA, in that the defendant knowingly made a false entry in or false alteration of any record,
4 document, legislative bill or enactment, or thing belonging to or received, issued, or kept by the
5 government for information or record or required by law to be kept by others for information of
6 the government, to wit: submitting false physical address to create company.

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8 Count IV

9 For a further and separate cause of action, being a different offense than that otherwise
10 set forth herein, the facts constituting the offense contained in Count IV are that on or about the
11 7th day of May, 2026, the above-named defendant committed the offense of THEFT, a felony in
12 violation of Section 45-6-301(2), MCA, in that the defendant purposely or knowingly obtained
13 by threat or deception control over property of the owner and had the purpose of depriving the
14 owner of the property, or purposely or knowingly used, concealed, or abandoned the property in
15 a manner that deprived the owner of the property, and the property exceed \$1,500 in value.

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17 Count V

18 For a further and separate cause of action, being a different offense than that otherwise
19 set forth herein, the facts constituting the offense contained in Count V are that on or about the
20 7th day of May, 2026, the above-named defendant committed the offense of MONEY
21 LAUNDERING, a felony in violation of Section 45-6-341, MCA, in that the defendant
22 knowingly received or acquired the proceeds of, or engaged in transactions involving the
23 proceeds of, any activity that was unlawful under the laws of the United States or the state in
24

1 which the activity occurred, and the money laundering was part of a common scheme or the
2 value of the proceeds or item exceeded \$1,500.

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4 A list of the possible witnesses for the State now known to the prosecution is as follows:

5 Witnesses necessary to lay foundation
Representative(s) from telephone/cell phone companies

6 Representative(s) from State Crime Laboratory

Representative(s) from State Identification Bureau

7 Rachel David, Evidence Technician, HPD

Dan Beadle, Evidence Technician, LCSO

8 S. Gleich

T. Jones

9 Corporal Nathan Casey, #759

Josh Graham, HPD

10 Kirkegard, HPD

Darin Chavers, HPD

11 Zac McMillen, HPD

Jon Pulsifer, HPD

12 Gonzales, HPD

Tavia Lewis, HPD

13 Berkley Congrad, HPD

C.

14 K.

D.

15 Ahmanda Gavaghan

Rafael Gomes da Silva

16 Gregory Strizich

Jessica Tate

17 Stephen Rothschild

Jeannette Bedros

18 Representatives of Intrepid Credit Union

Representatives of Wells Fargo Bank

19 Representatives of Bank of the Rockies

Representatives of Rocky Mountain Credit Union

20 Kirk Taylor

Representatives of Helena Ink & Toner

21 Representatives of Bank of the Rockies

Representatives of Montana MVD / Licensing Bureau

22 Representatives of Montana Secretary of State's Office

Representatives of Nevada Identification/Licensing Bureau

23 Representatives of Georgia Identification/Licensing Bureau

Representatives of U.S. Postal Service

Representatives of the Social Security Administration
Representatives of Wells Fargo Bank
Representatives of the Federal Bureau of Investigation
Shyanne Armstrong
Representatives of the Baymont Hotel
Jaswinder Singh
Representatives of Grizzly Gold
Damon Anderson
Representatives of Ashton Thomas Wealth
RaeAnn Yarn
Michael Wong
Garro Ghazarian
Jon Perkins
Expert in Financial Theft / Fraud
All individuals listed in discovery

Dated this 19th day of August, 2026.



KEVIN DOWNS, County Attorney
Lewis and Clark County

POSSIBLE PUNISHMENT:

Count I - TAMPERING WITH PUBLIC RECORDS OR INFORMATION, a felony:
Punishable by a fine not to exceed \$50,000 and a term of imprisonment not to exceed 10 Years.

Count II - TAMPERING WITH PUBLIC RECORDS OR INFORMATION, a felony:
Punishable by a fine not to exceed \$50,000 and a term of imprisonment not to exceed 10 Years.

Count III - TAMPERING WITH PUBLIC RECORDS OR INFORMATION, a felony:
Punishable by a fine not to exceed \$50,000 and a term of imprisonment not to exceed 10 Years.

Count IV - THEFT, a felony: Punishable by a fine not to exceed \$50,000 and a term of imprisonment not to exceed 10 Years.

Count V - MONEY LAUNDERING, a felony: Punishable by a fine not to exceed \$50,000 and a term of imprisonment not to exceed 20 Years.

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2 BAIL FOR THE DEFENDANT IS SET AT \$250,000 (posted)

3 ALL PREVIOUSLY IMPOSED CONDITIONS OF DEFENDANT'S RELEASE ON BOND
4 OR ON DEFENDANT'S OWN RECOGNIZANCE SHALL REMAIN IN FULL FORCE AND
5 EFFECT. THE COUNTY ATTORNEY OR DEPUTY ATTORNEY PROSECUTING THE
INSTANT CASE RESPECTFULLY REQUESTS NOTICE AND AN OPPORTUNITY TO BE
HEARD PRIOR TO MODIFICATION OF BOND AND/OR BOND CONDITIONS.

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7 **ELECTRONICALLY SIGNED BELOW**
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