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Attorney for State

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

STATE OF MONTANA,

Plaintiff,

No. ADC 2026-225

- vs -

MICHAEL MORGAN,
AKA MARC LUBASZKA

Defendant.

**AFFIDAVIT IN SUPPORT OF
AMENDED INFORMATION**

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

After being duly sworn the undersigned deposes and states I am the County Attorney for Lewis and Clark County. I submit this affidavit to summarize the investigation conducted by the Helena Police Department regarding the defendant for the Court to determine if probable cause exists to allow the State to file an Amended Information, alleging the defendant committed the offense(s) of Count I - TAMPERING WITH PUBLIC RECORDS OR INFORMATION, a felony, in violation of Section 45-7-208, MCA, Count II - TAMPERING WITH PUBLIC RECORDS OR INFORMATION, a felony, in violation of Section 45-7-208, MCA, Count III - TAMPERING WITH PUBLIC RECORDS OR INFORMATION, a felony, in violation of Section 45-7-208, MCA, Count IV - THEFT, a felony, in violation of Section 45-6-301(2), MCA, and Count V - MONEY LAUNDERING, a felony, in violation of Section 45-6-341,

1 MCA, based upon the reports and investigation of the Helena Police Department, the Affidavit
2 filed by the State in this cause on June 4, 2026, in addition to the following:

3 Helena Police Department Corporal Nathan Casey learned Morgan listed 336 S. Humboldt
4 Drive, Henderson, Nevada, as his address on the Nevada driver's license (DL). Cpl. Casey spoke
5 with the current owner of the Humboldt Drive residence. The owner did not know a Michael
6 Morgan or Marc Lubaszka. The owner had lived at that address since November 2025. Through
7 information checks, Cpl. Casey did not find any information suggesting Michael Morgan and/or
8 Marc Lubaszka had any connection to the Humboldt Drive address at any time.

9 Cpl. Casey found the chronology of Morgan's various transactions noteworthy, including
10 the following:

- 11 ■ February 21, 2024: Marc Lubaszka legally changes his name to Michael
- 12 Morgan in Nevada (as later learned);
- 13 ■ March 10, 2026: Marc Lubaszka obtains a new Nevada ID, using the S.
- 14 Humboldt Drive residence as his purported address, and then changes his name
- 15 to Michael Morgan with the Social Security Administration;
- 16 ■ April 15, 2026: Obtains a new SSN card under the name Michael Morgan;
- 17 ■ May 1, 2026: Rents P.O. Box from Helena Ink and Toner using fake Georgia
- 18 DL containing a different date of birth;
- 19 ■ May 4, 2026: Obtains Montana ID using fake West Riggs lease agreement;
- 20 ■ May 11, 2026: Enters Intrepid to open bank account using Montana ID and
- 21 fake West Riggs lease agreement.

22 Based upon Morgan's efforts, Cpl. Casey believed anyone conducting an investigation into
23 the Montana ID card would not be able to easily link it back to Marc Lubaszka.

24 Cpl. Casey obtained a copy of the cashier's check used by Morgan at Intrepid, which listed
K. as the remitter. The "pay to the order of" section was made out to Michael Morgan. The payee
address was a Wells Fargo Bank located in Oak Park California (CA). Cpl. Casey learned K.
resided within a few miles of this particular Wells Fargo Bank branch.

1 Cpl. Casey spoke to the Wells Fargo Bank manager at that Wells Fargo in CA. He learned
2 K. had come into the branch on May 11, 2026, and obtained the cashier's check for Morgan. The
3 manager could not release much information, but indicated the cashier's check was for an
4 "investment" and K. was adamant about sending it. It was reported Wells Fargo Bank staff
5 attempted to talk K. out of sending the cashier's check as it appeared to be a potential scam;
6 however, K. remained adamant about sending the check.

7 Cpl. Casey found it noteworthy that K. had told Wells Fargo the funds were for an
8 "investment" – similar to the online news articles regarding Morgan's alleged investment fraud.
9 During the search of Morgan's bag, Cpl. Casey found a February 2026 Wells Fargo Bank statement
10 for "K." and "D." It was determined through Cpl. Casey's investigation K. is D.'s mother. The
11 statement listed a number of significant deposits and withdrawals from the account in February
12 2026.

13 On July 1, 2026, a private investigator based in the Los Angeles area contacted HPD about
14 his contact with K. Cpl. Casey then contacted the investigator and K's lawyer. Cpl. Casey
15 subsequently conducted interviews of K. with her lawyer present and received numerous
16 documents and images related to Morgan and K.'s relationship. Cpl. Casey learned the following:

17 K. first met "Marky Mark" on a dating website in late December 2021. Her relationship
18 with him developed over time wherein she learned more about him, including that his name was
19 Michael Morgan hinting he was part of the JP Morgan family. K. recently contacted the
20 investigator and a lawyer after realizing Morgan was believed to be a fraudster.

21 Morgan told K. he owned a private jet company and purported to be extremely wealthy,
22 but remained very private about many details. K. said there was a "spark" between them and he
23 moved in with her after a short period of time. Cpl. Casey learned K. previously owned a nice
24

1 home in Malibu, California – which was destroyed in the 2025 Malibu wildfires. It was reported
2 K. later received an insurance payout as a result of the fire.

3 Over the course of their relationship, K. said Morgan relayed lavish stories about his
4 substantial wealth and business endeavors. K. provided additional context.

5 **Trust Letter:** Within a short period of time after they started dating, Morgan presented K.
6 with a trust letter with her name and information on it. The letter listed K. as a beneficiary of a
7 trust which was purported to have an enormous amount of money. The trust letter dated January
8 7, 2022 specified although she was the beneficiary, K. was not allowed to contact the attorney
9 listed on the trust. Cpl. Casey received and reviewed a copy of the trust letter.

10 Morgan told K. he was part of a very powerful “organization,” and in order for Morgan
11 and K. to be accepted as a couple, the “organization” would need to see them working well
12 together.

13 **Business Marketing:** K. reported giving Morgan \$20,000 a month starting in or around
14 June 2022, in part for him to market K.’s healthcare businesses and to create value for her. These
15 payments continued for approximately 10 months, equating to an estimated \$200,000. K. is
16 reported to have a history in healthcare as a nurse in the Malibu area. K. never received calls or
17 referrals to her businesses and continued to ask Morgan what he was doing with the money.

18 **Cars and Caviar:** Morgan wanted to set up a luxury car rental company called “Cars and
19 Caviar” with a corresponding website of www.carsandcaviar.com. Morgan convinced K. to
20 purchase two Lamborghinis for purported rental. K. learned Morgan drove one of the (chrome-
21 wrapped) Lamborghinis around and hired people to take pictures of him next to the car in wealthy
22 neighborhoods in the Los Angeles area. Morgan apparently registered the second Lamborghini in
23 Montana under a difficult business title to avoid paying taxes on the vehicle. Cpl. Casey located
24

1 an Instagram account under “Cars and Caviar”, which contained videos and images – the majority
2 of which showed a chrome-wrapped Lamborghini with a male who appears to be Morgan.

3 ***International Travel:*** Morgan and K. traveled internationally numerous times; however,
4 K. reported they did not fly together because Morgan said they could not do so until they were
5 married. K. reported traveling with Morgan to Milan, Italy, on two occasions where she paid for
6 the expenses. Morgan gave her the impression they needed to have one year of a peaceful
7 relationship prior to getting married and moving to Rome together – where he claimed he owned
8 a palace.

9 K. also described traveling to Sri Lanka to a garment factory believed to be *Hameedia* – a
10 prominent clothing company in Sri Lanka. Cpl. Casey located a video in Morgan’s possession
11 showing Morgan and K. touring what appears to be a clothing factory wherein red carpet was
12 rolled out upon their arrival to a factory. Morgan indicated he was going to purchase the company.

13 ***Grant Kingsley:*** Morgan also made numerous references to “Grant Kingsley” – who he
14 claimed was a fashion designer for royalty and the wealthy. Morgan claimed he worked very
15 closely with “Grant Kingsley.” Morgan gifted K. a suit during their Sri Lankan trip suggesting it
16 was designed by “Grant Kingsley.” K. also reported receiving a letter from “Grant Kingsley”
17 while staying at a hotel. The letter explained how she was gifted a luxury belt worth \$5.7 million.
18 She later placed the belt – per instructions – into a temperature-controlled room in her Malibu
19 home before the fire.

20 Cpl. Casey found “Grant Kingsley Inc.” had been registered with the Nevada Secretary of
21 State on October 21, 2025, listing Zane Rothschild as the registered agent. Notably, Rothschild
22 represented himself as Morgan’s attorney after Morgan was arrested in Helena in May 2026. Cpl.
23 Casey also found in Morgan’s possession two diamond encrusted paper folders with the name
24

1 "Grant Kingsley" on them. Cpl. Casey attempted to find information about "Grant Kingsley";
2 however, he was not able to find any indication "Grant Kingsley" was a real designer. Cpl. Casey
3 later received from Kristina's attorney a photograph of a Washington State DL with Morgan's
4 photograph under the name "Grant Kingsley" with a different date of birth. The DL came back to
5 another unknown male.

6 K. was not able to take the belt out of the box and never had the belt appraised. Given the
7 on-going concerns, K. believes Morgan may have created the belt with certain craft supplies.

8 **Gold Coins:** Morgan also convinced K. to purchase \$300,000 in gold coins as an
9 investment for them. The gold coins were placed in a safe, and later used for Morgan's bond
10 money.

11 **Faberge:** Cpl. Casey received from K.'s lawyer numerous documents – believed to be
12 fabricated. For example, one letter appeared to be from "Sarah Faberge" – a member of the
13 *Faberge* family who owns a luxury jewelry house in London, England. The letter was directed to
14 K. and appeared to outline a one-time offer from Faberge to K. and an investment opportunity.
15 Morgan claimed he was friends with Sarah.

16 Morgan also presented K. with a set of supposed Faberge caviar spoons along with an
17 invoice indicating the spoons were worth \$3.2 million. Cpl. Casey conducted online research and
18 found what he believed to be identical sets of the same Faberge caviar spoons worth a few hundred
19 to a few thousand dollars – nothing even remotely close to the purported \$3.2 million as suggested
20 on the invoice K. possessed.

21 **"Sir Michael" Website:** Cpl. Casey also learned of an existing website
22 "www.sirmichaelmontgomerymorganiv.com" – which consisted of numerous videos, pictures,
23 and descriptions of Morgan and his lavish lifestyle. For example, it contains one video of Morgan
24

1 and K. pulling into a parking garage in "Defender" Jeep-type vehicles with red and blue flashing
2 lights. Morgan and K. are then seen walking into a building. The website contains various
3 statements about Morgan. For example, "Sir Michael's net worth was estimated to exceed 10
4 figures at the age of 37 ..."; "Sir Michael was also mentored by 3 different billionaires between
5 the ages of 15 to 25 on a daily basis"; and "Sir Michael found that the Buddhist rules of living,
6 which are primarily centered around ethical conduct, resonated [sic] for with him and he has been
7 a [sic] dedicated practitioner for years ...[and] you can be [sic] extraordinarily successful without
8 lying, stealing, harming others, ..." There is belief Morgan intends to portray himself as a
9 European billionaire.

10 ***Sovereign Wealth Fund Advisors LLC:*** Cpl. Casey located a handwritten prototype of a
11 Sovereign Wealth Fund Advisors statement – with notes over the top of a Fidelity investment
12 report. It was titled "Sovereign Wealth Fund Advisors A Family Office" listing the account
13 holders as Michael Morgan and K. with a statement date of June 1, 2026 through June 30, 2026.
14 The asset value on the statement was listed as \$7.2 million. Based upon the investigation, Cpl.
15 Casey believed Morgan was possibly intending to vastly inflate the value of the account
16 (containing the transferred \$2.6 million from K.) on what appears to be a fraudulent or forged
17 statement. K. had indicated she had demanded to see an account statement showing the \$2.6
18 million was in an account growing wealth and earning interest, as promised.

19 ***Relationship and Cashier's Check:*** K. reported marrying Morgan in January 2026.
20 Morgan told K. his mother and family wanted to give them a wedding gift described as an
21 opportunity to increase wealth whereby whatever money K. was bringing into the family, the
22 family had the ability to multiply that amount by 2.5 times. Morgan's mother intended to
23
24

1 coordinate the transaction. Morgan told K. his mother was trying to travel to Singapore, but was
2 waiting for K.'s money so it could be processed. K. reported this occurring in May 2026.

3 K. was hesitant to give her money to him because the \$2.6 million was all the money she
4 had left – most of which came from the Malibu house fire insurance payout. She described Morgan
5 making her give the money as soon as possible via a wire transfer. K. reported going to a bank
6 with Morgan to follow through with a wire transfer to his family when Morgan abruptly cancelled
7 the transfer and stated he wanted a cashier's check instead of a wire transfer – without explanation.
8 Morgan promised to K. she would earn \$50,000-60,000 in interest monthly because he was a "high
9 net worth individual" and there was a lot of other money in the account accruing interest. Cpl.
10 Casey located Wells Fargo Bank paperwork in Morgan's possession showing an attempted wire
11 transfer of \$2.55 million occurring on May 7, 2026 – the same day the cashier's check was issued.
12 Cpl. Casey learned Morgan had setup an account at the Bank of the Rockies in Helena and the
13 initial wire transfer had the bank's information listed on it – although it never went through.

14 K. explained she was not aware Morgan took the cashier's check to Montana given she
15 understood Morgan intended to deposit the money into an already well-established fund owned by
16 his family. K. was under the impression she was going to be taken care of financially by marrying
17 Morgan and providing him with the cashier's check. K. noted Morgan never mentioned investing
18 the \$2.6 million in an investment company nor did he mention "Sovereign Wealth Fund Advisors,
19 LCC" to her.

20 In sum, it is believed the bank account opened by Morgan was created in order to divert K.'s
21 funds into a separate account only accessible by Morgan unknown to K. under a fictitious wealth
22 management company.
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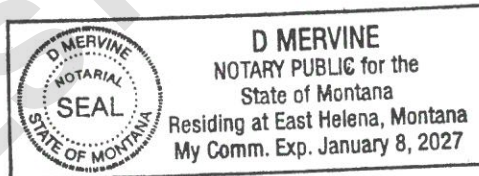
Further Affiant sayeth naught.

Dated this 19th day of August, 2026.

Kevin Downs
KEVIN DOWNS, County Attorney
Lewis and Clark County

SUBSCRIBED AND SWORN to before me this 19th day of August,
2026.

(SEAL) *D. Mervine*
NOTARY



CERTIFICATE OF SERVICE

I, Kevin Downs, hereby certify that I have served true and accurate copies of the foregoing Affidavit - Affidavit to the following on 08-19-2026:

Brent William Flowers (Attorney)
555 Fuller Avenue, Suite 2
Helena MT 59601
Representing: Michael Morgan
Service Method: eService

Electronically signed by Debra Mervine on behalf of Kevin Downs
Dated: 08-19-2026