

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE  
BRITTNEY C. BOYD, Plaintiff, v. INTERNATIONAL UNION OF OPERATING ENGINEERS  
LOCALS 302 & 612 PENSION TRUST, et al., Defendants.

Case No. 2:25-cv-01225-LK

## **DECLARATION OF BRITTNEY C. BOYD IN SUPPORT OF NOTICE OF PARALLEL OVERSIGHT INVESTIGATIONS**

I, **BRITTNEY C. BOYD**, declare as follows:

1. I am the Plaintiff Pro Se in the above-entitled action and the sole heir to the estate of my deceased father, Robert Delane Smith. I make this declaration based on my personal knowledge, review of the Defendants' own public filings (Form 5500 data), and subsequent forensic analyses performed on those filings.
2. The purpose of this Declaration is to authenticate the Exhibits filed concurrently with the **PLAINTIFF, BRITTNEY C. BOYD'S, NOTICE OF PARALLEL OVERSIGHT INVESTIGATIONS** (the "Notice") and to attest to the veracity of the facts contained within them, which demonstrate a systemic RICO enterprise, fiduciary corruption, and collusive litigation tactics by the Defendants.

## **I. AUTHENTICATION OF EXHIBITS**

1. Attached to the Notice are five Exhibits (Exhibits 1 through 5). The facts contained in these Exhibits are true and correct based on my knowledge of the decedent's history and the statistical data derived from Defendants' own public filings with the U.S. Department of Labor (DOL).
2. **Exhibit 1, the Consolidated Master Whistleblower Referral**, is a true and correct copy of the document recently submitted to the U.S. Department of Labor, Employee Benefits Security Administration (EBSA), the U.S. Department of Justice (DOJ) / FinCEN, and the GAO FraudNet system, detailing the comprehensive findings of the fraud enterprise, complete with the official federal case and referral numbers.
3. **Exhibit 2, the Master Key Forensic Audit Report**, is a true and correct report detailing the statistical and fiduciary anomalies within the Central Pension Fund (CPF, EIN 36-6052390). The report accurately establishes that the CPF reported **ZERO (\$0)** in death benefits paid for over 15 consecutive years, which is a statistical impossibility. The report also confirms the unexplained disappearance of **68,782 participants** in 2017 with zero reported deaths.
4. **Exhibit 3, the Financial Absorption Vehicle Analysis**, is a true and correct forensic analysis detailing the mechanism of asset laundering, specifically identifying the **State Street Union Station Labor Trust Fund (EIN 04-2607681)** which grew to **\$945 Million** while consistently reporting **ZERO participants**, demonstrating its function as an illegal Escheatment Absorption Vehicle.
5. **Exhibit 4, the Conflict of Interest and Collusion Analysis**, is a true and correct analysis detailing the structural corruption within the AGC-IUOE Local 701 Trust. The analysis confirms the prohibited conflict of interest of the **"Anderson Trifecta"** (John J. Anderson serving as both Employer President and Plan Trustee) and the corresponding **orchestrated default** of the Trusts to evade discovery in this case.
6. **Exhibit 5, the Proof of Career Erasure (Work History)**, is a true and correct document demonstrating my father's actual service dates (1974-2019) and skilled operator classifications, which the Defendants have systematically falsified or erased in their

records to justify the denial of benefits.

## II. PERSONAL KNOWLEDGE AND LITIGATION FRAUD

1. The Defendants' denial of my father's benefits was not a good-faith administrative error. It was the direct result of the systematic fraud described in the attached Exhibits.
2. The fabrication of my father's retirement date (claimed 2015, worked until 2019) and the subsequent denial of death benefits is a microcosm of the **68,782 Participant Purge** identified in the CPF audit (Exhibit 2), where participants are suppressed and assets are retained by the Enterprise.
3. The collusive defense strategy now unfolding in this litigation confirms the fraudulent intent. The **IUOE Pension Trusts (Fiduciaries)** have failed to appear and are in default. The **Employer (Ness & Campbell Crane, Inc.)** is the **ONLY** entity to respond, defended by attorney **Darien S. Loiselle** (Sokol Larkin, PLLC). This scenario confirms the Anderson Trifecta (John J. Anderson's dual role) is exploiting the Trusts to suppress evidence while simultaneously defending the corporate entity.
4. This pattern of misconduct and obstruction is consistent with the Ninth Circuit's previous sanction against these specific Trusts in **Tapley v. Locals 302 & 612 of the Int'l Union of Operating Engineers (2013)**, which found the Trustees guilty of willful misapplication of plan rules.

## III. FEDERAL OVERSIGHT

1. The severity of the evidence, including the statistically impossible **Zero Death Reporting** and the detailed audit of the **\$945 Million Ghost Fund**, has resulted in the initiation of active, parallel oversight investigations by the DOL EBSA (Case **202670-00903**), FinCEN (CRM **00101076483**), and the GAO FraudNet (Case **COMP-25-008559**).
2. I am prepared to testify fully regarding all facts contained in the attached Exhibits, and I respectfully request the Court take judicial notice of the gravity of the misconduct and the status of these federal investigations.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 7th day of December, 2025, at **Issaquah WA 98027**

**BRITTNEY C. BOYD**

Plaintiff Pro Se, Whistleblower  
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