

SETTLEMENT AGREEMENT

This settlement agreement is entered into by Jeffrey A. Mangan, in his official capacity as the current Montana Commissioner of Political Practices (hereinafter “the Commissioner”) and the following party: Yes for Cascade County Jobs, an authorized committee of the Great Falls Development Authority (hereinafter “the Respondent”).


Montana law authorizes the Commissioner to file an action in district court in order to seek a civil penalty for violation of Montana’s campaign finance and practices laws and rules, §§13-37-124 and 13-37-128 Mont. Code Ann. In order to avoid litigation, the Commissioner and the Respondent enter into this agreement to resolve this matter.

1. The Commissioner acknowledges that the COPP issued an Order of Non Compliance to Respondent for violation of Montana’s campaign finance and practices laws on October 27, 2017.
2. On January 2, 2018 the Commissioner issued a Finding of Sufficient Facts to Support a Campaign Practice Violation, the Commissioner’s cause number COPP-2017-ONC-001 a (hereinafter “the Decision”). The Decision determined that the Respondent failed to comply with certain campaign finance and practices laws and administrative regulations.
3. The Respondent acknowledges that they have read and understand the Commissioner’s decision issued in the above referenced cause.
4. The Respondent acknowledges the findings of fact contained in the Decision and admits violations of Montana's Campaign Finance and Practice Laws including:
 - a) failure to timely update your statement of organization to reflect the appointment of a new treasurer and disclosing their address, Mont. Code Ann. § 13-37-201 and ARM and 44.11.303(2); and
 - b) failure to timely and fully report campaign contributions and expenditures pursuant to Mont. Code Ann. §§ 13-37-225, 226, 229 and ARM 44.11.401 and 501.
5. This matter is settled under the following terms:
 - a. The Commissioner has determined to exercise his discretion in this matter, and applies the principals of mitigation to offset the monetary civil fine that could have been applied based on an agreement by Yes for Cascade County Jobs to provide in-kind public education activities for the public good in the form of the ‘Great Jobs for Great Falls’ pilot program, an effort involves creating connections between residents who need/want

jobs and better jobs with businesses who need great employees. This project is to be funded and administered by the Great Falls Development Authority. The program will initiate September of 2018 and run through June 30, 2019 as part of this agreement.

- b. And, the Commissioner and the Respondent agree that execution of this settlement agreement by both parties, and a payment of a civil fine in the amount of \$5,000.00 by the Respondent, fully and finally resolves all of the issues as set forth in the Decision.
6. Simultaneously with the return of the executed settlement agreement the Respondent will remit to the Commissioner \$5,000.00, on a check made out to: "Commissioner of Political Practices" and mailed to the Office of the Commissioner of Political Practices, 1209 8th Avenue, P.O. Box 202401, Helena, Montana, 59620.
7. In consideration of payment of the civil fine referenced above, the Commissioner agrees not to pursue any further administrative or court proceedings against the Respondent or other persons that may be named or unnamed in the Decision, based on the matters discussed in the Decision and in this Settlement Agreement.
8. The Respondent enters into this agreement to avoid litigation and to resolve and settle this dispute with the Commissioner. It is understood and agreed that the payment of the civil fine referenced above, and execution of this settlement agreement by the Respondent is accepted as the sole consideration for full satisfaction and compromise of what may be disputed claims.
9. The Commissioner and the Respondent fully and forever release and discharge each other and their respective officials, officers, members, employees, successors, assigns, agents, ostensible agents, attorneys, and representatives from any and all actions, claims, causes of action, demands, expenses, damages or injuries, whether asserted or unasserted, known or unknown, foreseen or unforeseen, arising out of the matters investigated by the Commissioner and summarized in the Decision and in this Settlement Agreement.
10. The Commissioner and the Respondent agree that the executed Settlement Agreement is a public document and will be made available to members of the public.
11. This settlement agreement, consisting of 3 pages, sets forth the entire agreement that has been reached between the Commissioner and the Respondent. No

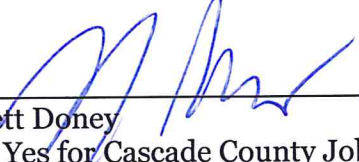
modification or amendment of this agreement will be effective unless both parties complete a subsequent written statement that is signed by both parties.



Jeffrey A. Mangan
Commissioner of Political Practices

8/20/18

Dated



Brett Doney
for Yes for Cascade County Jobs

8/16/18

Dated