

## 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: Steve Bullock and Friends of Steve Bullock (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.

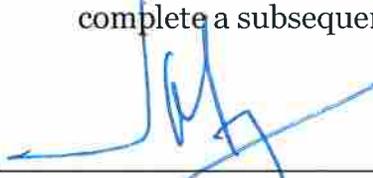
1. The Commissioner acknowledges that Mr. Ellsworth filed a Campaign Finance and Practices Complaint against Mr. Bullock for violation of Montana’s campaign finance and practices laws on October 28, 2016.
2. On June 28, 2017 the Commissioner issued a Summary of Facts and Finding of Sufficient Evidence to Show a Violation of Montana’s Campaign Practices Act, the Commissioner’s cause number COPP-2016-CFP-041 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 the failure to timely report campaign expenditures, Mont. Code Ann. § 13-37-226.
5. The Friends of Steve Bullock campaign have filed reports which disclose the following expenditures for flights during the 2016 campaign cycle. The campaign is closed in the CERS system, and the Commissioner accepts the following disclosure as proper corrective action to the CERS reports as a part of the settlement of this matter. The expenditures for each identified report would be adjusted as follows:
  - a. The April 12, 13 and 20 flights should have been reported on the May 1, 2016 report; the April 30, May 4, 5, and 11 flights should have been reported on the May 23, 2016 report; the May 25 flight should have been reported on the June 1, 2016 report; and the June 15 flight should have been reported on the June 27, 2016 report. They were late disclosed on

the August 1, 2016 report, disclosing \$1,155.56 in flight expenditures by the campaign.

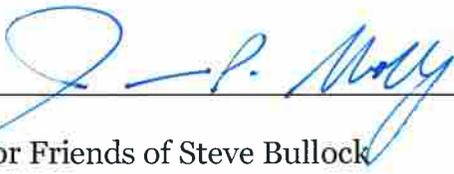
- b. The July 8, 11, 19 and 20 flights should have been reported on the August 1, 2016 report, the August 2, 5, 16, 17, 18, 23, 25 flights should have been reported on the September 1, 2016 report; and the September 1, 8, 12, 13, 15, 21, 22, 23, 25 and 26 flights should have been reported on the October 1, 2016 report. They were late disclosed on the October 24, 2016 report, disclosing \$2,785.74 in flight expenditures by the campaign.
  - c. The October 3, 6, 12, and 13 flights should have been reported on the October 24, 2016 report, and the October 21 and 18 flights should have been disclosed on the November 1, 2016 report. They were late disclosed on the November 28, 2016 report, disclosing \$620.36 in flight expenditures by the campaign.
6. 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 \$3,000.00 by the Respondent, fully and finally resolves all of the issues as set forth in the Decision.
  7. Simultaneously with the return of the executed settlement agreement the Respondent will remit to the Commissioner \$3,000.00, on a check made out to: "Commissioner of Political Practices" and mailed to the Office of the Commissioner of Political Practices, 1209 8<sup>th</sup> Avenue, P.O. Box 202401, Helena, Montana, 59620.
  8. 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.
  9. 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.
  10. 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.

11. 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.
  
12. 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.

  
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Jeffrey A. Mangan  
Commissioner of Political Practices

8-31-17  
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Dated

  
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for Friends of Steve Bullock

8-29-2017  
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Dated