

**SETTLEMENT AGREEMENT In the Matter of Richard A. Little's
Complaint Against Bullock for Governor Campaign**

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This settlement agreement is entered into by Jay P. Dufrechou, Deputy Commissioner of Political Practices (hereinafter "the Deputy Commissioner") and Steve Bullock with respect to alleged actions or inactions of the Steve Bullock Campaign for Governor (Respondent) involving failure to adhere to procedural requirements of campaign law and regulation.

On October 25, 2012, the Deputy Commissioner issued a summary of facts, statement of findings and conclusion *In the Matter of Richard A. Little's Complaint Against Steve Bullock* determining that Respondent Bullock's campaign violated Montana Administrative Rule 44.10.503 through expenditure of campaign funds with checks signed by persons other than the appointed campaign treasurer or duly authorized deputy treasurer (hereinafter "October 25, 2012 decision"). The total expenditures noted in the decision were \$15,472.15.

Montana law authorizes the Commissioner to file an action in district court to seek a civil penalty. Pursuant to § 13-37-111(4)(b)(iii), MCA, the Deputy Commissioner, "with respect to only the specific matter from which the commissioner is recused, has the same authority, duties, and responsibilities as the commissioner would have absent the recusal." In order to avoid litigation, the Deputy Commissioner and Respondent enter into this agreement to resolve this matter.

1. Following execution of this agreement the Respondent will pay to the Commissioner's office Three Thousand Dollars (\$3,000.00) with a check made out to "Commissioner of Political Practices" and mailed to the office of Commissioner of Political Practices, P.O. Box 202401, Helena, Montana, 59620. The funds will go to the credit of the State of Montana General Fund.

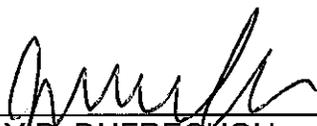
2. The Deputy Commissioner agrees that a check in the total amount of Three Thousand Dollars (\$3,000.00) from the Respondent fully satisfies the obligation pursuant to Respondent's payment obligations under this agreement.

3. This agreement and the payment referenced herein fully and finally resolve all of the issues discussed in and related to the October 25, 2012 decision. In consideration of the payment amount referenced above, the Deputy Commissioner agrees not to pursue any further administrative or court proceedings against Steve Bullock, the Bullock Campaign for Governor, any agents of the Campaign or Bullock, or any of the other persons named or unnamed in the October 25, 2012 decision, based on the matters discussed in that decision.

4. By entering into this Agreement, Respondent in no way admits any liability to the Deputy Commissioner or Office of the Commissioner of Political Practices, individually or collectively, all such liability being expressly denied. It is understood and

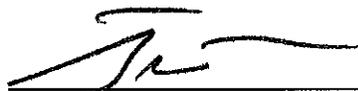
agreed that the payment of the settlement amount referenced above by the Respondent is accepted as the sole consideration for full satisfaction and compromise of disputed claims, and that neither the payment of the settlement amount nor the negotiations for settlement shall be considered an admission of any liability or wrongdoing by the Respondent or any agent of his campaign.

5. The Deputy Commissioner and 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 Deputy Commissioner or the Office of the Commissioner of Political Practices and summarized in the October 25, 2012 decision.



JAY P. DUFRECHOU
Deputy Commissioner of Political Practices

July 26, 2013
DATE



STEVE BULLOCK

July 12, 2013
DATE