

SETTLEMENT AGREEMENT

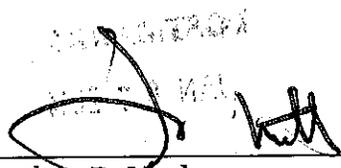
This settlement agreement is entered into by Jonathan R. Motl, in his official capacity as the current Montana Commissioner of Political Practices (hereinafter “the Commissioner”) and the following party: Steve Bullock (hereinafter “the Respondent”).

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. Tuininga (hereinafter “the Complainant”) filed a Campaign Finance and Practices Complaint against the Respondent for violation of Montana’s campaign finance and practices laws on September 10, 2012.
2. On October 17, 2013 the Deputy Commissioner issued a Statement of Findings and Conclusion, the Commissioner’s cause number COPP-2012-CFP-0026 (hereinafter “COPP-2012-CFP-0026 decision”). The COPP-2012-CFP-0026 decision determined that the Respondent failed to comply with certain campaign finance and practices laws and administrative regulations.
3. The Respondent acknowledges that he has read and understands the Commissioner’s decision issued in the above referenced cause.
4. The Respondent’s campaign for Governor in 2012 filed 25 separate Campaign Finance Reports (C-5s) which contained thousands of contributions and hundreds of expenditures typical of a statewide campaign. The Complainant alleged 17 violations. The Commissioner’s counsel and staff reviewed each allegation, and 14 were rejected as in compliance with the law, and 3 violations were found. All of the contributions were fully disclosed to the public in a timely manner, and the errors in reporting were clerical in nature regarding the designation of the contributions.
5. The Respondent acknowledges the findings of fact contained in the decision and accepts responsibility for failure to properly designate as general election contributions three contributions received during the primary election period.

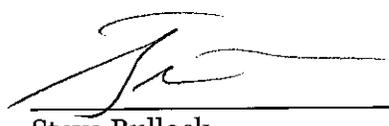
6. The Respondent acknowledges the importance of receiving written verification of a contributor's intent to fund the primary or general campaign of a candidate, either through designation on the check, or in a separate writing at the time the contribution is made.
7. The Commissioner and the Respondent agree that execution of this settlement agreement by both parties and the payment of a civil fine in the amount of \$100.00 by the Respondent, fully and finally resolves all of the issues as set forth in the COPP-2012-CFP-0026 decision.
8. Simultaneously with the return of the executed settlement agreement the Respondent will remit to the Commissioner \$100.00, on a check made out to: "Commissioner of Political Practices" and mailed to the Office of the Commissioner of Political Practices, 1205 8th Avenue, P.O. Box 202401, Helena, Montana, 59620.
9. 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 October 17, 2013 decision, based on the matters discussed in the COPP-2012-CFP-0026 decision.
10. The Respondent enters into this agreement 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.
11. 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 COPP-2012-CFP-0026 decision.
12. 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.

13. 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.



Jonathan R. Motl
Commissioner of Political Practices

9 January 2014
Dated



Steve Bullock

3 January 2014
Dated