

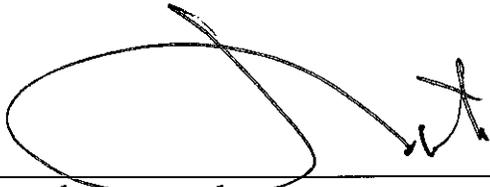
## SETTLEMENT AGREEMENT

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: Women for a Better Sanders County (WBSC) and Richard Wells (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 Ms. Linda Hayes a member of a civic group called Women for a Better Sanders County filed a Campaign Finance and Practices Complaint against Mr. Wells for violation of Montana’s campaign finance and practices laws on May 27, 2014.
2. On June 24, 2014 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-2014-CFP-0025 (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 understands the Commissioner’s decision issued in the above referenced cause.
4. The Respondent acknowledges the findings of fact contained in the Decision and admits that they failed to register with the Commissioner of Political Practices office as an incidental committee, and to disclose the fact that they made an election expenditure in the 2013 election. Failing to register and disclose includes failures to appoint a campaign treasurer, designate a campaign account, and failure to timely file reports and disclosure to the Commissioner of Political Practices Office, §§13-37-201, 226(4), 229 and 230 Mont. Code Ann. and 44.10.327 Mont. Admin. R.
5. The Respondent further acknowledges and admits to having failed to include a complete attribution on the campaign newspaper advertisements, in violation of 13-35-225(1) Mont. Code Ann.
6. The Respondent acknowledges that their failure to file campaign reports and disclosures were also a violation of the public trust.

7. The Commissioner has taken into consideration the principal of mitigation, including the Respondent's voluntary relinquishment of the use of the name "Women for a Better Sanders County", and the Respondent's status as a disabled Armed Services Veteran of limited resources in the settlement in this matter.
8. The Commissioner and the Respondent agree that execution of this settlement agreement by both parties, and the attached apology by the Respondent, fully and finally resolves all of the issues as set forth in the Decision.
9. The Respondent will return the executed settlement agreement to the Office of the Commissioner of Political Practices, 1205 8<sup>th</sup> Avenue, P.O. Box 202401, Helena, Montana, 59620.
10. In consideration of the attached apology, 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.
11. 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 apology 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.
12. 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.
13. 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.
14. 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

10-01-14

Dated



Richard "Dick" Wells, Treasurer  
f.d.b.a. Women for a Better Sanders  
County (WBSC)

9-29-14

Dated

**POSTMARKED**

**SEP 20 2014**

Thompson Falls, Montana  
September 19, 2014

RECEIVED

2014 SEP 23 A 9:42

Dear Linda Haywood and Women for a Better Sanders County;

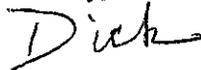
COMMISSIONER OF  
POLITICAL PRACTICES

Please accept my sincere apology and forgive my offence to Women for a Better Sanders County WBSC.

When I placed political ads as WOMEN FOR A BETTER SANDERS COUNTY (WBSC) in the two local newspapers, you voiced concern in letters to the Secretary of State and me. Then, when you challenged my use of the name, I rescinded the registration for that name.

Please forgive me.

Sincerely,



Dick Wells

Cc: Commissioner of Political Practices  
file