

SETTLEMENT AGREEMENT

Re: VanFossen v. Missoula County Republican Central Committee, Missoula County Republicans Inc., et al, COPP-2023-CFP-008.

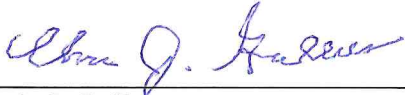
This Settlement Agreement (Agreement) is entered into by Chris J. Gallus, in his official capacity as the current Montana Commissioner of Political Practices (the Commissioner) and the Missoula County Republican Central Committee and Missoula County Republicans Inc., (the Respondents), (collectively the Parties).

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, Mont. Code Ann. (MCA) §§ 13-37-124 and 128. In order to avoid litigation, the Commissioner and the Respondents enter into this Agreement to completely and finally resolve this matter.

1. The Commissioner acknowledges that a Campaign Finance and Practices Complaint was filed against the Respondents for violations of Montana's campaign finance and practices laws on June 12, 2023.
2. On October 19, 2023, the Commissioner issued a Partial Dismissal and Finding of Facts Sufficient to Support Violations, the Commissioner's cause number COPP-2023-CFP-008 "the Decision." The Decision determined that the Respondent failed to comply with certain campaign finance and practices laws and administrative regulations.
3. The Respondents acknowledge that they have read and understand the Decision, acknowledge that the facts contained therein are accurate, and that the findings are based in law.
4. The Respondents specifically acknowledge that the Commissioner determined that pursuing the matter was justified and determined there were certain violations of Montana's Campaign Finance and Practice laws including MCA §§ 13-37-201(2)(b), 203, and 204 regarding campaign treasurers, MCA §§ 13-37-225, 229 regarding disclosure requirements and MCA § 13-37-225 regarding timely reporting.
5. As a consequence of these findings (Section 4) the Commissioner referred this matter to the Missoula County Attorney as required by MCA §§ 13-37-124 and 125. The County Attorney has referred this matter back to the Commissioner for prosecution, which makes the matter appropriate for civil action or settlement.
6. The Commissioner and the Respondents agree that execution of this Agreement by both parties, and the payment of a civil fine in the amount of nine hundred and thirty-eight dollars (\$938.00) by the respondent fully resolves all of the issues set forth in the decision.

7. The civil fine is payable as follows:
 - a. The Respondents agree to pay the amount of \$469.00 as a civil fine which COPP shall remit to the State General Fund.
 - b. The Commissioner agrees that services provided by the Respondents in order to facilitate a campaign finance training which occurred in Missoula, MT on March 23, 2024, are accepted in satisfaction of the remaining balance.
 - c. The Respondents agree that in the event there is a need for an additional campaign finance training in Missoula, MT during the 2024 election cycle, upon request of the Commissioner, they will assist in facilitating such an event.
8. As services described have already been provided by the Respondents, this executed Agreement and a payment of a civil fine in the amount of \$469.00 by the Respondents fully and finally resolves all of the issues as set forth in the Decision.
9. Simultaneously with the return of the executed Agreement, the Respondents will remit to the Commissioner a check in the amount of \$469.00 made out to “Commissioner of Political Practices” and delivered to the Office of the Commissioner of Political Practices, 1209 8th Ave., P.O. Box 202401, Helena, Montana, 59620.
10. In consideration of payment of the civil fine as described in section six (6) of this Agreement, the Commissioner agrees not to pursue any further proceedings against the Respondents based on the matters addressed in the Decision and in this Agreement.
11. The Respondents enter 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 as described in section six (6) of this Agreement, and execution of this Agreement by the Respondent, is accepted as the sole consideration for full satisfaction and compromise of what may be disputed claims.
12. The Parties fully and forever release and discharge each other and their respective 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 in this Agreement. The condition set forth in Section 6C of this Agreement to assist in facilitating an additional training will not cause a default with respect to this release provision (Section 11).
13. The Parties agree that the executed Agreement is a public document and will be posted on COPP’s website and otherwise made available to members of the public.

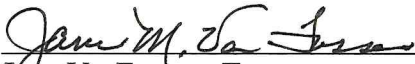
14. This Agreement, consisting of three (3) pages sets forth the entire agreement between the Commissioner and the Respondents. No modification or amendment of this Agreement will be effective unless a subsequent written statement is signed by both parties.



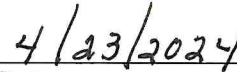
Chris J. Gallus
Commissioner of Political Practices



Date



Jane VanFossen, Treasurer
Missoula County Republican Central Committee
Missoula County Republicans Inc.



Date