

**SETTLEMENT AFFIDAVIT OF DANIEL KENNEDY**

STATE OF MONTANA )  
County of Yellowstone )

Comes now the undersigned, Daniel Kennedy, having been duly sworn, and states as follows:

1. I am Daniel Kennedy of Laurel, Montana.
2. I was a 2010 primary election candidate for nomination by the Republican Party for election from House District 57 (HD 57). I was opposed in the primary election by Debra Bonogofsky of Billings, Montana.
3. I had not been active as a candidate in Montana elections prior to 2010. As a 2010 candidate, I received the services of a group of corporations and people led by a man named Christian LeFer. I knew Christian as a leader of a group known as Western Tradition Partnership.
4. I received services from the groups working with LeFer including: mailing list production, campaign training and advice, voter identification, letter writing, radio ads, letter production, website development, and document production. The entire production of services was substantial, involving tens of thousands of letters, documents and voter lists.
5. I did not know at the time but now understand that the services I received came from paid staff of National Right to Work (a Virginia corporation) or its affiliated corporations. I now understand that these services were not allowed under Montana law as prohibited corporate contributions provided to a candidate, so I should not have accepted them.

6. I regret my association with the groups that I now know to be National Right to Work and its affiliated corporations. I have terminated any association with these entities.

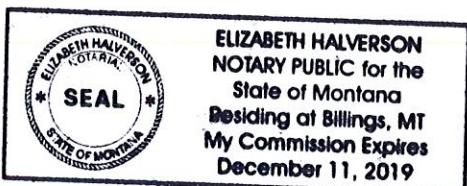
7. I served as an elected Montana official for one legislative session. In my experience, if third party groups, corporations, or people, regardless of ideological view, conduct themselves as did National Right to Work in Montana's 2010 elections, including mine, that conduct would be inconsistent with Montana's political culture. While I can see my mistake best by hindsight I also accept my responsibility for not determining the nature of these groups before accepting the paid services they were offering me.

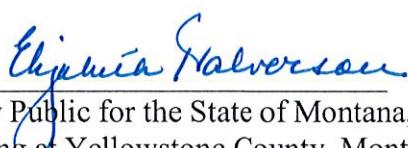
FURTHER AFFIANT SAYETH NOT.

DATED this 1 day of September, 2016.

  
\_\_\_\_\_  
Daniel Kennedy

SUBSCRIBED AND SWORN to before me this 1 day of September, 2016.



  
\_\_\_\_\_  
Elizabeth Halverson  
Notary Public for the State of Montana,  
Residing at Yellowstone County, Montana  
My Commission expires: 12. 11. 19

## SETTLEMENT AGREEMENT

Based on the foregoing statement and in contemplation of the COPP complaint I, Daniel Kennedy, agree to settle any and all claims made against me by the COPP. I have read the COPP complaint against me and I wish to resolve the issues raised in the complaint. In consideration of settling all claims and counterclaims I sign the above affidavit and agree to pay a fine in the amount of \$19,599 on or before September 26, 2016. If payment is not made in full on or before that date, Defendant agrees to pay \$100 per day for every day any part of the civil fine is not paid as well as any attorney's fees and costs incurred to enforce this provision. By my signature I, Daniel Kennedy, settle all claims, counterclaims and issues that are made or could be made in *COPP v. Kennedy*, Cause No. XBDV-2014-234, First Judicial District Court, Lewis and Clark County.

I, Jonathan Motl, the Commissioner of Political Practices of the State of Montana, accept the above affidavit statement and the amount of \$19,599 (taken as a fine) as full and final settlement of all claims, counterclaims and issues that are made or could be made in the matter of *COPP v. Kennedy*, Cause No. XBDV-2014-234, First Judicial District Court, Lewis and Clark County. I agree as part of this settlement to move to dismiss with prejudice the above-entitled case.

\_\_\_\_\_  
Jonathan R. Motl  
Commissioner of Political Practices

\_\_\_\_\_  
Daniel Kennedy

\_\_\_\_\_  
Dated

\_\_\_\_\_  
Dated

9-01-16

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