

POSTMARKED

MAR 17 2017

SETTLEMENT AGREEMENT

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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 parties: Montanans for Veracity, Diversity and Work and David Paoli ("Respondents").

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 Respondents enter into this agreement to resolve this matter.

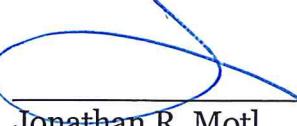
1. A campaign practice complaint was filed against Respondents in the final weeks of Montana's 2014 primary election. The Commissioner issued a Decision responding to the Complaint, dated July 16, 2014.
2. The Decision documents prepared by the Commissioner are posted for public viewing on the COPP website under *Fletcher v. Montanans for Diversity and Work*, No. COPP-2014-CFP-028. The reader of this Settlement Agreement is directed to these documents for a summary and description of the issues resolved by this Settlement Agreement.
3. The Respondents acknowledge that they have read and understand the Commissioner's Decision issued in this Matter.
4. The Commissioner hereby acknowledges that the Respondents have filed all disclosures and documents required in this Matter. The issue for which the social debt (fine) is assessed is that of unintentional late filing of the disclosures and documents.
5. This Matter is settled under the following terms:
 - a. The Respondents agree to pay the amount of \$3,712.50 as a civil fine to resolve this Matter. The fine amount is to be paid as \$1,485 in cash plus a value in the amount of \$2,227.50 as in-kind costs and services to be provided by Respondents in support of continuing legal education (CLE) program offered in Missoula on the topic of the role of attorneys involved in campaigns involving ballot issues or candidates. The CLE will be held in advance of 2018 elections. The Commissioner greatly appreciates the Respondents willingness to participate in this CLE. The accounting

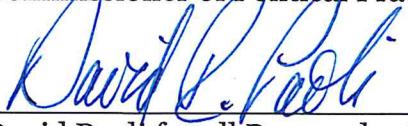
responsibilities of Respondents as to showing the in-kind will be the minimal amount necessary.

- b. The Commissioner settles this Matter with the understanding that Respondents actions were not deliberate as to any violation of Montana's Campaign Finance and Practice Laws. 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 are disputed claims.
6. The Commissioner and the Respondent agree that execution of this settlement agreement by both parties, and a payment of a civil fine in the amount of \$1,485 cash plus cooperation as to the CLE by the Respondents, fully and finally resolves all of the issues as set forth in the Decision.
7. Simultaneously with the return of the executed settlement agreement the Respondents will remit to the Commissioner \$1,485, on a check made out to: "Commissioner of Political Practices" and mailed to the Office of the Commissioner of Political Practices, 1209 8th Avenue, P.O. Box 202401, Helena, Montana, 59620.
8. In consideration of payment of the civil fine referenced above, the Commissioner agrees not to pursue any further administrative or court proceedings against the Respondents or other persons that may be named or unnamed in the Decision, based on the matters discussed in the Decision and in this Settlement Agreement.
9. The Commissioner and the Respondents 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 and in this Settlement Agreement.

10. The Commissioner and the Respondents agree that the executed Settlement Agreement is a public document.
11. This settlement agreement, consisting of 3 pages, sets forth the entire agreement that has been reached between the Commissioner and the Respondents. No

modification or amendment of this agreement will be effective unless both parties complete a subsequent written statement that is signed by both parties.

 hwt
Jonathan R. Motl
Commissioner of Political Practices


David Paoli for all Respondents

3/20/17
Dated

3/17/17
Dated