

SETTLEMENT AGREEMENT

This settlement agreement is entered into by Jonathan R. Motl, in his official capacity as the Montana Commissioner of Political Practices (hereinafter “the Commissioner”) and Brad Molnar (“Respondent”). The Commissioner and Respondent agree as follows:

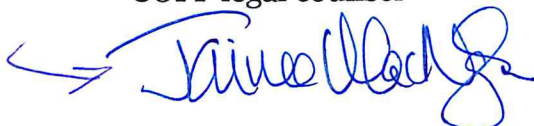
1. A Commissioner and Respondent have, beginning in the summer of 2008, discussed, contested and litigated the issues leading to this Settlement Agreement. The disagreement as to these issues was finally resolved by a January 23, 2013 Decision of the Montana Supreme Court: *Molnar v. Fox* 213 MT 132, 370 Mont. 238, 301 P. 3rd 824.
2. The Decision of the Montana Supreme Court affirmed a Judgment against Respondent in the amount of \$20,695, consisting of \$5,750 administrative penalty and \$14,945 as a partial reimbursement of costs.
3. Taking the January 23, 2013 date as the date that the Judgment amount of \$20,695 began to draw interest, the total amount owed as of April 1, 2017 is \$29,370, including interest.
4. Respondent agrees to pay the amount of \$29,730 by payment of \$2,800 cash and \$26,930 in volunteer services. The volunteer services will be provided to the entities listed in that certain document attached as Exhibit A to this Settlement Agreement. For the purposes of this Settlement Agreement, Mr. Molnar’s services are valued at \$26.93 per hour, meaning he will provide 1,000 hours of service to the identified entities with the approximate number of hours dedicated to each entity listed as described above.
5. Respondent explains that he has suffered a serious physical injury that made it impossible for him to continue in work involving most physical labor. Further, Respondent explains that he is now living on a fixed income. While Respondent does not have enough money to pay the judgment (and while still disagreeing with the legal theories advanced in this Matter), he wishes to move on with his life and settle the social obligation placed on him in this Matter, doing so with the provision of a mix of cash and volunteer services.

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 \$2,800 cash plus 1000 hours of volunteer services (valued at \$26,930 herein) fully and finally resolves all of the issues as set forth in the Decision.
7. This executed Settlement Agreement, when signed, will be a final Settlement Agreement (incorporating Exhibit A, the list of service entities required in paragraph four of this Agreement). This Settlement Agreement, along with \$2,800, through a check made out to: "Commissioner of Political Practices" should be 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 (through cash and services) of the civil fine referenced above, the Commissioner agrees not to pursue any further administrative or court proceedings, including collection, against the Respondent or other persons that may be named or unnamed in the Decision, based on the matters discussed in *Molnar v. Fox* 213 MT 132, 370 Mont. 238, 301 P. 3rd 824.
9. Upon Respondent's written statement to the Commissioner (with a copy to each of the entities identified in Exhibit A) that he has satisfied the 1000 service hours required in this Agreement, the Commissioner shall promptly file a satisfaction of judgment in the underlying district court matter and also, upon request from Respondent, take whatever steps are necessary to release any lien that may have resulted from the judgment.
10. This Settlement Agreement, consisting of three 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.

Jonathan R. Motl
Commissioner of Political Practices



Witnessed by: Jaime MacNaughton
COPP legal counsel



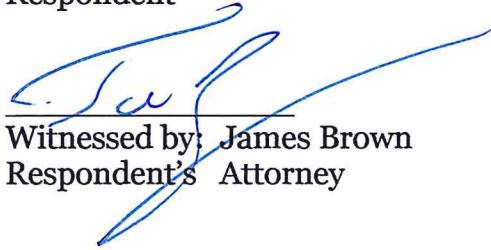
4-13-17
Dated

4-17-17
Dated



Brad Molnar
Respondent

4/11/17
Dated



Witnessed by: James Brown
Respondent's Attorney

4/12/17
Dated

April 14, 2017

Jonathan Motl
Commissioner
Commissioner of Political Practices
1205 8th Avenue
Helena, MT 59601

Dear Jon:

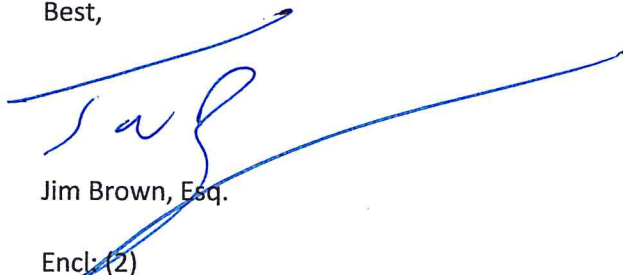
Please find enclosed the Settlement Agreement document signed by Brad Molnar.

I have also enclosed herewith Check No. 2998 for \$2,800.00 covering the settlement payment.

These documents should resolve this matter by and between Mr. Molnar and the State.

Once you have executed the Settlement Agreement, please return a signed copy to me for my records.

Best,



Jim Brown, Esq.

Encl: (2)