

**SETTLEMENT AGREEMENT In the Matter of Don Hart's
Complaint Against Bullock for Governor Campaign**

RECEIVED
2013 JUL 26 A 11:52

This settlement agreement is entered into by Jay P. Dufrechou, Deputy Commissioner of Political Practices (hereinafter "the Deputy Commissioner") and Steve Bullock with respect to alleged actions or inactions of the Steve Bullock Campaign for Governor (Respondent) involving failure to adhere to procedural requirements of campaign law and regulation.

On November 23, 2012, the Deputy Commissioner issued a summary of facts, statement of findings and conclusion *In the Matter of Don Hart's Complaint Against Steve Bullock* determining that Respondent Bullock's campaign violated § 13-37-207, MCA, by failing to deposit one campaign contribution check within five days of receipt, as required by the aforementioned statute (hereinafter "November 23, 2012 decision"). The amount of the check was \$600.00.

Montana law authorizes the Commissioner to file an action in district court to seek a civil penalty. Pursuant to § 13-37-111(4)(b)(iii), MCA, the Deputy Commissioner, "with respect to only the specific matter from which the commissioner is recused, has the same authority, duties, and responsibilities as the commissioner would have absent the recusal." In order to avoid litigation, the Deputy Commissioner and Respondent enter into this agreement to resolve this matter.

1. Following execution of this agreement the Respondent will pay to the Commissioner's office Two Hundred Fifty Dollars (\$250.00) with a check made payable to "Commissioner of Political Practices" and mailed to the office of Commissioner of Political Practices, P.O. Box 202401, Helena, Montana, 59620. The funds will go to the credit of the State of Montana General Fund.

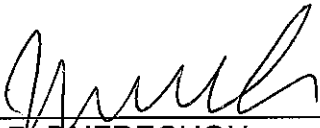
2. The Deputy Commissioner agrees that a check in the total amount of Two Hundred Fifty Dollars (\$250.00) from the Respondent fully satisfies the obligation pursuant to Respondent's payment obligations under this agreement.

3. This agreement and the payment referenced herein fully and finally resolve all of the issues discussed in and related to the November 23, 2012 decision. In consideration of the payment amount referenced above, the Deputy Commissioner agrees not to pursue any further administrative or court proceedings against Steve Bullock, the Steve Bullock Campaign for Governor, any agents of Bullock or the Campaign, or any of the other persons named or unnamed in the November 23, 2012 decision based on the matters discussed in that decision.

4. By entering into this Agreement, Respondent in no way admits any liability to the Deputy Commissioner or Office of the Commissioner of Political Practices, individually or collectively, all such liability being expressly denied. It is understood and agreed that the payment of the settlement amount referenced above by the Respondent


is accepted as the sole consideration for full satisfaction and compromise of disputed claims, and that neither the payment of the settlement amount nor the negotiations for settlement shall be considered an admission of any liability or wrongdoing by the Respondent or any agent of his campaign.

5. The Deputy Commissioner and 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 Deputy Commissioner or the Office of the Commissioner of Political Practices and summarized in the November 23, 2012 decision.



JAY P. DUFRECHOU
Deputy Commissioner of Political Practices

July 26, 2013
DATE



STEVE BULLOCK

July 12, 2013
DATE