

## SETTLEMENT AGREEMENT

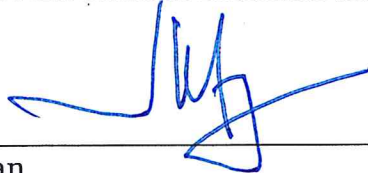
This Settlement Agreement is entered into by Jeffrey A. Mangan, in his official capacity as the current Montana Commissioner of Political Practices (hereinafter “the Commissioner”) and the following party: The Montana Conservative Coalition (hereinafter “the Defendant”).

1. The Commissioner and the Defendant agree that execution of this Settlement Agreement by both parties, and payment of the settlement amount of \$5,350.00 by the Defendant Montana Conservative Coalition, fully and finally resolves all of the issues as set forth in the Complaint filed in Cause No. BDV 2016–204 in the Montana First Judicial District Court, Lewis & Clark County.
2. Simultaneously with the return of the executed Settlement Agreement, the Defendant will remit to the Commissioner \$5,350.00, 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.
3. In consideration of payment of the settlement sum referenced above, the Commissioner agrees to dismiss the above-referenced court proceedings against the Defendant or other persons that may be named or unnamed in the Complaint, based on the matters discussed in the Complaint.
4. The Defendant enters into this Agreement to resolve and settle the above-referenced litigation with the Commissioner. It is understood and agreed that the payment of the settlement sum referenced above, and execution of this Settlement Agreement by the Defendant is accepted as the sole consideration for full satisfaction and compromise of what may be disputed claims contained in the Complaint.
5. The Commissioner and the Defendant 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 Complaint in Montana First Judicial District Cause No. BDV 2016–204.
6. Montana Conservative Coalition settles all claims, counterclaims and issues that are made or could be made in *COPP v. Montana Conservative Coalition*, Cause No. BDV 2016–204, First Judicial District Court, Lewis and Clark County.
7. The Commissioner of Political Practices of the State of Montana accept the above Settlement Agreement and the amount of \$5,350.00 as full and final settlement of all claims, counterclaims and issues that are made or could be made in the matter of *COPP v. Montana Conservative Coalition*, Cause No. BDV 2016–204, First Judicial District Court, Lewis and Clark County. The Commissioner’s attorney of record shall dismiss with prejudice, as fully settled upon the merits, the above-described civil action. Each party shall pay their respective costs and attorneys’ fees.

8. The Commissioner and the Defendant agree that the executed settlement agreement is a public document.

9. This Settlement Agreement sets forth the entire agreement that has been reached between the Commissioner and the Defendant. No modification or amendment of this agreement will be effective unless both parties complete a subsequent written statement that is signed by both parties.

10. The laws of the State of Montana shall apply to the interpretation of this Agreement.



\_\_\_\_\_  
Jeffrey Mangan  
MONTANA COMMISSIONER OF POLITICAL PRACTICES

\_\_\_\_\_  
2/10/17  
DATE



\_\_\_\_\_  
MONTANA CONSERVATIVE COALITION  
By Its Authorized Representative Jacob Eaton

\_\_\_\_\_  
2/7/17  
DATE