

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 the following parties: Jane Lerner and Peggy Foster (hereinafter "the Respondents").

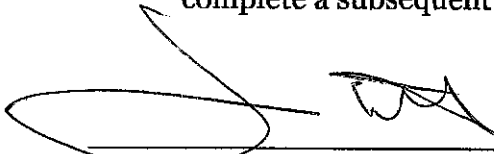
Montana law authorizes the Commissioner to file an action in district court in order to seek a civil penalty for violation of Montana's campaign finance and practices laws and rules, §§13-37-124 and 13-37-128 Mont. Code Ann. In order to avoid litigation, the Commissioner and the Respondents enter into this agreement to resolve this matter.

1. The Commissioner acknowledges that Bridger Canyon resident Ms. Ann Marie Quinn filed a Campaign Finance and Practices Complaint against the Respondents for violation of Montana's campaign finance and practices laws on June 16, 2014.
2. On November 5, 2014 the Commissioner issued a Summary of Facts and Finding of Sufficient Evidence to Show a Violation of Montana's Campaign Practices Act, the Commissioner's cause number COPP-2014-CFP-0031 (hereinafter "decision"). The decision determined that the Respondents failed to comply with certain campaign finance and practices laws and administrative regulations.
3. The Respondents acknowledge that they have read and understand the Commissioner's decision issued in the above referenced causes.
4. The Respondents acknowledges the findings of fact contained in the decision, and admits to having failed to properly attribute campaign yard signs and brochures in violation of Mont. Code Ann. § 13-35-225.
5. The Commissioner acknowledges that the Respondent Ms. Lerner attempted to ascertain from staff of the COPP whether or not attributions were required in special district elections in April of 2014. As described on page 7 of the Sufficiency Finding, the Commissioner has taken this into consideration and applied the principle of mitigation to his consideration of the amount of the civil fine in this matter.
6. The Commissioner indicated in the decision that mitigation would be considered and applied to the amount of the fine negotiated between the Commissioner and the Respondents if the Respondents chose to settle the matter with the

Commissioner. The Commissioner has applied the principle of mitigation to his consideration of the amount of the civil fine in this matter.


7. The Commissioner and the Respondents agree that execution of this settlement agreement by both parties, together with a payment of a civil fine in the amount of \$150.00 by the Respondents, fully and finally resolves all of the issues as set forth in the decision.
8. Simultaneously with the return of the executed settlement agreement the Respondents will remit to the Commissioner \$150.00, on a check made out to: "Commissioner of Political Practices" and mailed to the Office of the Commissioner of Political Practices, 1205 8th Avenue, P.O. Box 202401, Helena, Montana, 59620.
9. In consideration of payment of the civil fine referenced above and execution of this settlement agreement by the Respondents, the Commissioner agrees not to pursue any further administrative or court proceedings against the Respondents or other persons that may be named or unnamed and based on the matters discussed in the decision.
10. The Respondents enter into this agreement to avoid litigation and to resolve and settle all disputes with the Commissioner. It is understood and agreed that the payment of the civil fine referenced above and execution of this settlement agreement by the Respondents is accepted as the sole consideration for full satisfaction and compromise of what may be disputed claims.
11. 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.
12. The Commissioner and the Respondents agree that the executed Settlement Agreement is a public document and will be made available to members of the public.
13. 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.



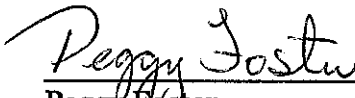
Jonathan R. Motl
Commissioner of Political Practices

Dated



Jane Lerner

5-27-15
Dated



Peggy Foster

May 20, 2015
Dated