

## SETTLEMENT AGREEMENT

Based on my Settlement Affidavit and in contemplation of the claims asserted against me in the Complaint filed in *COPP v. Pat M. Wagman*, First Judicial District Court, Cause No. BDV-2014-267, Hon. Judge McMahon presiding, I agree to settle any and all claims made against me by the COPP. I have carefully read the complaint in Cause No. BDV-2014-267 and understand the allegations made against me, and I wish to resolve the issues raised in the complaint.

In addition, I also want to resolve the issues raised in the complaint on file in *Pat Wagman and the Park County Attorney v. COPP*, First Judicial District Court, Cause No. BDV-2014-716, Hon. Judge McMahon presiding.

In consideration of settling all claims and counterclaims made or that could be made in the two noted matters, I sign the Settlement Affidavit of Pat M. Wagman, and agree to pay a civil fine in the amount of \$19,599 on or before October 1, 2017. If payment is not made in full on or before that date by me, I, Pat Wagman, agree to pay \$100 per day for every day any part of the civil fine is not paid as well as any attorney's fees and costs incurred to enforce this provision.

By my signature I, Pat Wagman, hereby settle all claims, counterclaims and issues that are asserted or could be asserted in Cause No. BDV-2014-267 and in Cause No. BDV-2014-716.

I, Jeff Mangan, the Commissioner of Political Practices of the State of Montana, accept the Settlement Affidavit of Pat M. Wagman and the amount of \$19,599 (taken as a civil fine) as full and final settlement of all claims, counterclaims and issues that are asserted or could be asserted in Cause No. BDV-2014-267 and in Cause No. BDV-2014-716. I agree as part of this settlement to move to dismiss each of the two matters with prejudice with each party to bear their own costs and attorneys' fees.

Dated this 8 day of August, 2017.

  
Pat M. Wagman

Dated this 25<sup>th</sup> day of August, 2017.

  
Jeff Mangan  
Commissioner of Political Practices

MONTANA FIRST JUDICIAL DISTRICT COURT  
LEWIS AND CLARK COUNTY

---

The COMMISSIONER OF POLITICAL  
PRACTICES FOR THE STATE OF  
MONTANA, through JEFF MANGAN,  
acting in his official capacity as the  
Commissioner of Political Practices,

Plaintiff,

v.

PAT M. WAGMAN,

Defendant.

)  
) Cause No. BDV-2014-267

)  
) Judge Michael McMahon

)  
) SETTLEMENT AFFIDAVIT  
) OF PAT M. WAGMAN

PAT WAGMAN and the PARK  
COUNTY ATTORNEY

Plaintiffs,

v.

The COMMISSIONER OF POLITICAL  
PRACTICES FOR THE STATE OF  
MONTANA

)  
) Cause No. BDV-2014-716

)  
) Judge Michael McMahon

STATE OF MONTANA )

County of Park )

PAT M. WAGMAN, being duly sworn, deposes and says:

1. I am the Defendant in Cause No. BDV-2014-267 and one of the Plaintiffs in Cause No. BDV-2014-716.

2. In 2010 I was a primary election candidate for nomination by the Republican Party for election to the Montana Senate from Senate District 31. I lost in the June 8, 2010, primary election to Ron Arthun.

3. The 2010 primary campaign was my fourth campaign for a seat in the Montana Legislature.

4. Having been a candidate three times prior to 2010, I was familiar with the campaign finance laws of the State of Montana, and I knew that it was illegal to accept contributions, including in-kind contributions, from a corporation. In addition, I knew prior to 2010 that a candidate is required under Montana law to report and disclose all contributions received. Lastly, I knew prior to 2010 that political candidates were required to maintain campaign records for the four year period of time set out in Title 13 of the Montana Code and to produce the same when requested by the Commissioner.

5. In the 2010 primary, I received services from a group of corporations as well as from individuals led by Christian LeFer.

6. That it is my responsibility as a candidate to monitor all services provided to me by those involved in my campaign and insure that the services provided are paid for and that they come from legal sources. I failed to do so and the services (in-kind contributions) that I received from these individuals

and corporations included: mailing list, campaign training, walk list (with identified issues), letter writing, production and mailing, website development and document production. The services received were substantial, involving thousands of letters, documents and the identities of voters and the issues they supported.

7. The services I received came from Christian LeFer and it is now my understanding that he may have worked for and solicited funds from the National Right to Work, a Virginia corporation, and its affiliated corporations (e.g. National Gun Owners Association and National League of Taxpayers). I acknowledge that these services and goods that I received and accepted were in-kind contributions made to me by corporations and that I violated Montana law by accepting them and failing to report and disclose them.

8. I acknowledge that I violated Montana law by failing to maintain campaign records for the four year period of time set out in Title 13 of the Montana Code and to produce the same when requested by the Commissioner.

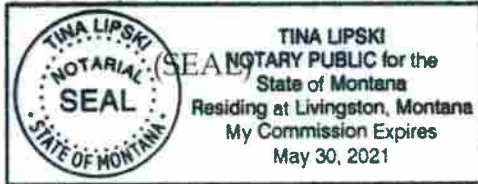
FURTHER AFFIANT SAYETH NOT.

Dated this 25 day of August, 2017.

  
Pat M. Wagman

SUBSCRIBED AND SWORN to before me this 25<sup>th</sup> day of

August, 2017.



Tina Lipski  
Notary Public for the State of Montana  
Residing at: Livingston  
My Commission expires: May 30, 2021