

## SETTLEMENT AGREEMENT

By and through their undersigned counsel, the State of Vermont (the “State”) and Planned Parenthood of Northern New England Action Fund, Inc., (“PPNNE Action Fund”) hereby agree to resolve the campaign finance complaint brought by Let Vermont Vote as follows:

WHEREAS, Craig Bensen, Executive Director of Let Vermont Vote, filed a complaint on February 16, 2012, with the Vermont Attorney General’s Office alleging that PPNNE Action Fund had violated campaign finance laws in 2010;

WHEREAS, PPNNE Action Fund attempted in good faith to comply with Vermont’s campaign finance laws and now wishes to resolve this matter without litigation; and

WHEREAS, the State and PPNNE Action Fund agree that the following facts are true and accurate:

1. PPNNE Action Fund is a nonprofit corporation with offices in Burlington, Vermont, whose purpose is public education and advocacy on issues of reproductive health care and reproductive choice. In 2010 it was engaged in activities in several states in Northern New England, including Vermont.

2. In 2010, PPNNE Action Fund received and spent more than \$500 on communications to advocate for or against candidates in the 2010 Vermont gubernatorial election.

3. Vermont law, under 17 V.S.A. § 2801(4), defines a political committee as a corporation or other entity that receives contributions of more than \$500 and makes expenditures of more than \$500 in any one calendar year for the purpose of supporting or opposing one or more candidates.

4. Political committees are required by 17 V.S.A. § 2831 to register with the Secretary of State's Office and are required by 17 V.S.A. § 2811 to file periodic campaign finance reports.

5. In October 2010, PPNNE Action Fund spent approximately \$119,000 on television advertising in Vermont advocating for the election of gubernatorial candidate Peter Shumlin and against gubernatorial candidate Brian Dubie. It ran an advertisement called "Brian Dubie is Out of Touch with Vermont Women" and another advertisement called "PPNNE Action Fund Sheds Light on Dubie's Risky Record and Agenda."

6. PPNNE Action Fund met the definition of a political committee in Vermont in 2010 and was required to register and file reports, but failed to do so.

7. In 2010, PPNNE Action Fund received contributions from single source donors in amounts greater than \$2,000. Vermont law, 17 V.S.A. § 2805(a), prohibits political committees from accepting contributions in excess of \$2,000 from a single source in any two-year general election cycle.

8. Planned Parenthood of Northern New England operated a political committee in Vermont called Planned Parenthood of Northern New England Action Fund Vermont PAC ("PPNNE VT-PAC").

9. PPNNE VT-PAC was a political committee in Vermont in 2010 and filed campaign finance reports with the Secretary of State. It has made direct contributions to candidates for election in other election cycles.

10. The State contends that a full examination of the records and operations of PPNNE Action Fund and PPNNE VT-PAC would reveal that the same decision-makers are involved in both funds and that there is significant overlap in the planning, activities, and

finances of PPNNE Action Fund and PPNNE VT-PAC. PPNNE Action Fund contests this view and believes it has operated as an independent expenditure entity, but has chosen not to undertake the burden and expense involved in establishing the facts that would rebut this contention.

11. The State investigated the allegation that PPNNE Action Fund coordinated campaign advertising with the Shumlin campaign and found insufficient evidence of related expenditures and no violation of the limits on contributions to candidates.

WHEREFORE, the State and PPNNE Action Fund agree to settle this matter by taking the following actions:

A. the State covenants and agrees not to sue, or file a complaint or other charge (either civil or criminal) or seek any other legal or administrative enforcement action against, PPNNE, PPNNE VT-PAC, PPNNE Action Fund, their affiliates, officers, directors, employees, agents, members, contributors or donors, successors, and assigns for enforcement of any campaign finance violations (whether known or unknown) related to PPNNE VT-PAC's and PPNNE Action Fund's activities in the 2009-2010 Vermont general election cycle.

B. PPNNE Action Fund agrees to pay \$30,000 to the State as a civil penalty within thirty (30) days of the signing of this Stipulated Settlement;

C. PPNNE Action Fund agrees to file campaign finance reports, in form and substance as approved by the Attorney General's Office, with the Vermont Secretary of State covering the 2009-2010 general election cycle within 21 days of signing this Stipulated Settlement; and

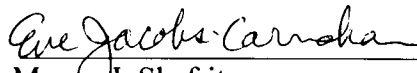
D. In the future, if PPNNE Action Fund engages in advertising supporting or opposing candidates for election to Vermont office, but does not make only independent

expenditures in a particular general election cycle, PPNNE Action Fund shall not accept contributions in excess of Vermont's limit on contributions to political committees (currently \$2,000 in any two-year general election cycle) for use on expenditures supporting or opposing candidates for election in Vermont.

Dated in Montpelier, Vermont this 18<sup>th</sup> day of November 2013.

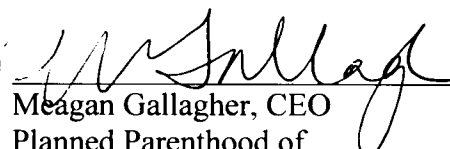
STATE OF VERMONT

WILLIAM H. SORRELL  
ATTORNEY GENERAL

By:   
Megan J. Shafritz  
Eve Jacobs-Carnahan  
Assistant Attorneys General  
Office of the Attorney General  
109 State Street  
Montpelier, VT 05609-1001  
(802) 828-5527

Dated in Montpelier, Vermont this 11 day of November 2013.

PLANNED PARENTHOOD OF  
NORTHERN NEW ENGLAND  
ACTION FUND, INC.

By:   
Meagan Gallagher, CEO  
Planned Parenthood of  
Northern New England Action Fund, Inc.  
128 Lake Street  
Burlington, Vermont 05401

## SETTLEMENT AGREEMENT

By and through their undersigned counsel, the State of Vermont (the “State”); and Pam Pac, Decker Zinn, LLC (“Decker Zinn”), and Pamela Mackenzie (“Mackenzie”) (collectively, “Respondents”) hereby agree to resolve the campaign finance complaint filed by Paul Engels pertaining to the March 2013 South Burlington City Council election as follows:

WHEREAS, Paul Engels filed a complaint with the Vermont Attorney General’s Office alleging that Decker Zinn and Pam Pac had violated campaign finance laws in connection with the 2013 South Burlington City Council election;

WHEREAS, Respondents wish to resolve this matter without litigation; and

WHEREAS, the State and Respondents agree that the following facts are true and accurate:

1. Pamela Mackenzie is an individual.
2. Decker Zinn, LLC, is a Vermont limited liability company wholly owned by Mackenzie.
3. Pam Pac was a committee formed by Mackenzie and Decker Zinn, LLC, in 2013. Pam Pac is not a corporation, limited liability company, partnership, or other separate legal entity.
4. Pam Pac did not register its name, address, treasurer or bank account with the Secretary of State's Office as a political committee.
5. Pam Pac did not maintain a single checking account in a single bank publicly designated as its bank account for the financial transactions of the political committee.
6. Mackenzie filed pre-election campaign finance reports for Pam Pac with the South Burlington City Clerk and the Secretary of State on February 21, 2013, and signed the

reports as treasurer of Pam Pac. These reports included the completed cover page with signed certification on behalf of Pam Pac, a completed page titled “Details of Contributions Over \$100,” and a completed page titled “Details of Expenditures.” The reports did not include page 2, titled “Contribution and Expenditure Summary.” Since Pam Pac received no contributions of \$100 or less, in-kind contributions, or loans during the time period covered by the pre-election report, the inclusion of the “Contribution and Expenditure Summary” would not have provided any information not already shown on the other pages of the report.

7. Mackenzie inaccurately stated in the February 21, 2013, pre-election campaign finance report that Pam Pac had received a contribution of \$1,090 on February 7, 2013, from Decker Zinn and that Pam Pac had made an expenditure of \$1,090 on February 7, 2013, for advertising in *The Other Paper*.

8. Mackenzie believes she mailed a post-election campaign finance report for Pam Pac to the South Burlington City Clerk and to the Secretary of State on March 8, 2013, and retained a copy for her records, but neither office has a copy in its files.

9. Pam Pac received contributions from 10 single sources during February and March 2013. Mackenzie contributed \$2,000; Decker Zinn contributed \$2,000; and \$100 was contributed by each of eight individuals.

10. One or more of the Respondents placed advertisements advocating votes in support of candidates Patricia Nowak and Chris Shaw (“Advertisements”) that appeared in *The Other Paper* on February 14, 21, and 28, 2013, and in the *Burlington Free Press* on March 1, 2013.

11. The Advertisements included lists of people who indicated they supported Patricia Nowak and Chris Shaw for election. The total expenditure for the Advertisements was \$4,782.

12. The attribution on these four advertisements read, "Paid for by DeckerZinn, LLC, Pam Mackenzie." It did not include the name and address of Pam Pac.

WHEREAS, the State adopts the following conclusions of law. Respondents disagree with these conclusions but choose not to undertake the burden and expense of contesting them:

1. Pam Pac was a political committee that accepted contributions and made expenditures of more than \$500.00 in 2013 in support of candidates Patricia Nowak and Chris Shaw prior to the March 2013 South Burlington City Council election. Pam Pac failed to register as a political committee pursuant to 17 V.S.A. §2831(a). Pam Pac failed to maintain a checking account as required by 17 V.S.A. § 2802.

2. Pam Pac failed to file complete campaign finance reports in connection with the March 2013 South Burlington City Council election pursuant to 17 V.S.A. § 2831(b). Pam Pac failed to file a post-election campaign finance report for Pam Pac with the South Burlington City Clerk as required by 17 V.S.A. § 2831(b). Pam Pac filed an inaccurate pre-election campaign finance report for Pam Pac in violation of 17 V.S.A. § 2803.

3. Pam Pac ran four advertisements in support of candidates in the March 2013 South Burlington City Council election but failed to include the appropriate identification of Pam Pac required by the electioneering communication provision of 17 V.S.A. § 2892.

4. Pam Pac's advertisements were facilitated, solicited, or approved by candidates Shaw and Nowak and thus were contributions to those candidates pursuant to 17 V.S.A. § 2809(a) & (c). Pam Pac contributed advertisements valued at \$4,782.00 to Chris Shaw and

Patricia Nowak, exceeding the \$3,000.00 per election limit on contributions from political committees to candidates set forth in 17 V.S.A. § 2805(b) as amended by 1987 Vt. Acts & Resolves 263, § 3 (Adj. Sess.).

NOW, THEREFORE, the State and Respondents agree to settle this matter by taking the following actions:

A. The State covenants and agrees not to sue, or to file a complaint or other charge (either civil or criminal), or to seek any other legal or administrative enforcement action against Respondents, or any of them, or their affiliates, officers, directors, employees, agents, members, contributors or donors, successors, or assigns, for enforcement of any campaign finance violations (whether known or unknown) by Pam Pac, Pamela Mackenzie, Decker Zinn LLC, or any of them, during the 2013 South Burlington City Council election cycle;


B. Respondents agree to pay \$2,000.00 to the State as a civil penalty within thirty (30) days of the signing of this Stipulated Settlement; and

C. Respondents agree to file campaign finance reports, in form and substance attached hereto, with the Vermont Secretary of State, covering the 2013 South Burlington City Council election cycle, within 21 days of signing this Stipulated Settlement.

STATE OF VERMONT

WILLIAM H. SORRELL  
ATTORNEY GENERAL

March 16, 2015

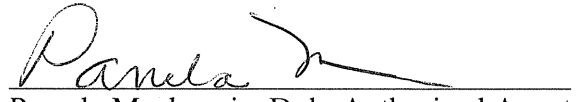
By:   
Eve Jacobs-Carnahan  
Assistant Attorney General  
Office of the Attorney General  
109 State Street  
Montpelier, VT 05609-1001  
(802) 828-3176



DECKER ZINN, LLC

March 22 2015

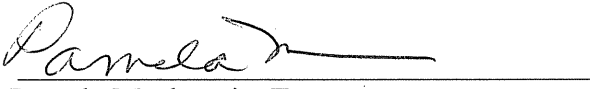
By:

  
Pamela Mackenzie, Duly Authorized Agent

PAM PAC

March 22 2015

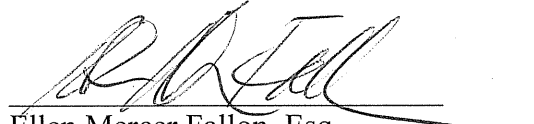
By:

  
Pamela Mackenzie, Treasurer

March 22 2015

  
PAMELA MACKENZIE, Individually

APPROVED AS TO FORM:

  
Ellen Mercer Fallon, Esq.  
LANGROCK SPERRY & WOOL, LLP  
Attorneys for Respondents  
645457.1

AMENDED

CAMPAIGN FINANCE DISCLOSURE FORM

CERTIFICATION FOR POLITICAL ACTION COMMITTEES (PACs) OR POLITICAL PARTIES

NAME OF COMMITTEE/PARTY: Pam Pac

CONTACT PERSON: Pam Mackenzie

ADDRESS: 40 Hummingbird Lane TOWN: S. Burlington STATE: VT ZIP: 05403

TELEPHONE: 802-497-1340

THIS THE REPORT DUE: 2/23/13 (Fill in date.)

We have made contributions to affect a local (municipal) election held in: S. Burlington

The election was/will be held on: 3/5/13 (Date of election) THIS IS OUR REPORT DUE: [ ] 30 days prior to election. [x] 10 days prior election [ ] 14 days after election

[ ] NO ACTIVITY TO REPORT- There has been no activity in the campaign account since the previously filed report.

ALL PACs/PARTIES: This report amends one previously filed on: 2/21/13 (ONLY if changing a PREVIOUSLY FILED report.)

SURPLUS FROM previous campaign TOTAL surplus from 20\_\_ : \$ TOTAL CARRYFORWARD to current campaign (surplus - donations + interest): \$

(NOTE: Complete this section ONLY for first report of new campaign cycle if carrying forward surplus funds from a prior campaign)

WE HAVE COMPLETED AND ATTACHED THE FOLLOWING FORMS for this reporting period:

- [x] Certification of PAC or party - This sheet (REQUIRED) [x] Contribution & Expenditure Summary (As needed) [x] Details of Contributions Over \$100 (As needed) [x] Details of Expenditures (As needed)

[ ] FINAL REPORT: This is our FINAL REPORT for the current Campaign Cycle and closes out our current campaign by indicating the disposition of any surplus or debt, and all contributions and expenditures for this cycle are accounted for. (Only check when filing final report.) Note: A FINAL REPORT is required to close out a campaign. This does NOT mean that your account must be closed.

CHECK ONE ONLY: [ ] We have \$ surplus from the current campaign and this amount will be carried forward to the new campaign. [ ] Surplus funds from the current campaign in the amount of \$ have been donated to the charity, candidate, PAC or political party listed in the attached Details of Expenditures sheet, leaving a balance of \$0.

I hereby certify, under the pains and penalties of perjury, that the information provided on all pages of this campaign finance disclosure report is true and accurate to the best of my knowledge, information and belief.

By checking this box, no signature is needed and you agree to the terms and conditions above under Vermont law. [ ]

3/22/15 Date Pamela Treasurer Signature Pamela Mackenzie Name of person signing form (PRINT)

\*\*A PDF of this report can be sent to campaignfinance@sec.state.vt.us and must be received by 5 PM on the reporting deadline.\*\*

Name of PAC/Party:

**CONTRIBUTION and EXPENDITURE SUMMARY**

**CONTRIBUTIONS**

<b>CONTRIBUTIONS OVER \$100</b>	(1) Total Contributions – this reporting period:	\$ 1090
	(2) Total Contributions – Campaign to Date:	\$ 1090

NOTE: If you received contributions over \$100, you must attach the Details of Contributions Over \$100 sheet(s).

<b>CONTRIBUTIONS \$100 OR LESS</b>	(3) Total Contributions – this reporting period:	\$ 0
	(4) Number of contributors – this reporting period:	0
	(5) Total Contributions – Campaign to Date:	\$ 0
	(6) Number of contributors – Campaign to Date:	

**GRAND TOTAL OF ALL CONTRIBUTIONS**

<b>FOR THIS REPORTING PERIOD</b>	(7) Subtotal of non-monetary (in-kind) contributions:	\$ 0
	(8) Subtotal of monetary contributions (Lines 1+3 – 7):	\$ 1090
	<b>(9) TOTAL – This Reporting Period (Lines 7 + 8):</b>	\$ 1090
<b>CAMPAIGN TO DATE</b>	(10) Subtotal of non-monetary (in-kind) contributions:	\$ 0
	(11) Subtotal of monetary contributions (Lines 2 + 5 – 10):	\$ 1090
	<b>(12) TOTAL – Campaign to Date (Lines 10 + 11):</b>	\$ 1090

**EXPENDITURES**

<b>GRAND TOTAL OF ALL EXPENDITURES</b>	<b>TOTAL – This Reporting Period:</b>	\$ 1090
	<b>TOTAL – Campaign to Date:</b>	\$ 1090

NOTE: If you have made expenditures for this reporting period, you will need to attach the Details of Expenditures sheet(s)

**LOANS OR OTHER DEBT**

<b>TOTAL PRIVATE LOANS OR OTHER OBLIGATIONS CURRENTLY OUTSTANDING</b>	Total Loans – This Reporting Period:	\$ 0
	Total Loans – Campaign to Date:	\$ 0
<b>TOTAL DEBT/OBLIGATIONS FORGIVEN</b>	Total Loans – This Reporting Period:	\$ 0
	Total Loans – Campaign to Date:	\$ 0

NOTE: If you have loans or other debt outstanding or debt that has been forgiven, you will need to attach the Details of Loans/Other Obligations sheet(s).





AMENDED

CAMPAIGN FINANCE DISCLOSURE FORM

CERTIFICATION FOR POLITICAL ACTION COMMITTEES (PACs) OR POLITICAL PARTIES

NAME OF COMMITTEE/PARTY: Pam Pac

CONTACT PERSON: Pam Mackenzie

ADDRESS: 40 Hummingbird Lane TOWN: South Burlington STATE: VT ZIP: 05403

TELEPHONE: 802-497-1340

THIS THE REPORT DUE: 3/15/13 (Fill in date.)

We have made contributions to affect a local (municipal) election held in: S. Burlington

The election was/will be held on: 3/5/13 (Date of election) THIS IS OUR REPORT DUE: [ ] 30 days prior to election. [ ] 10 days prior election [x] 14 days after election

[ ] NO ACTIVITY TO REPORT- There has been no activity in the campaign account since the previously filed report.

ALL PACs/PARTIES: This report amends one previously filed on: 3/8/13 (ONLY if changing a PREVIOUSLY FILED report.)

SURPLUS FROM previous campaign TOTAL surplus from 20\_\_ : \$ TOTAL CARRYFORWARD to current campaign (surplus - donations + interest): \$

(NOTE: Complete this section ONLY for first report of new campaign cycle if carrying forward surplus funds from a prior campaign)

WE HAVE COMPLETED AND ATTACHED THE FOLLOWING FORMS for this reporting period: [x] Certification of PAC or party - This sheet (REQUIRED) [x] Contribution & Expenditure Summary (As needed) [x] Details of Contributions Over \$100 (As needed) [x] Details of Expenditures (As needed)

[ ] FINAL REPORT: This is our FINAL REPORT for the current Campaign Cycle and closes out our current campaign by indicating the disposition of any surplus or debt, and all contributions and expenditures for this cycle are accounted for. (Only check when filing final report.) Note: A FINAL REPORT is required to close out a campaign. This does NOT mean that your account must be closed.

CHECK ONE ONLY: [ ] We have \$ surplus from the current campaign and this amount will be carried forward to the new campaign. [ ] Surplus funds from the current campaign in the amount of \$ have been donated to the charity, candidate, PAC or political party listed in the attached Details of Expenditures sheet, leaving a balance of \$0.

I hereby certify, under the pains and penalties of perjury, that the information provided on all pages of this campaign finance disclosure report is true and accurate to the best of my knowledge, information and belief.

By checking this box, no signature is needed and you agree to the terms and conditions above under Vermont law. [ ]

3/22/15 Date Pamela Treasurer Signature Pamela Mackenzie Name of person signing form (PRINT)

\*\*A PDF of this report can be sent to campaignfinance@sec.state.vt.us and must be received by 5 PM on the reporting deadline.\*\*

Name of PAC/Party:

**CONTRIBUTION and EXPENDITURE SUMMARY**

**CONTRIBUTIONS**

<b>CONTRIBUTIONS OVER \$100</b>	(1) Total Contributions – this reporting period:	\$ 2910.
	(2) Total Contributions – Campaign to Date:	\$ 4000.

NOTE: If you received contributions over \$100, you must attach the Details of Contributions Over \$100 sheet(s).

<b>CONTRIBUTIONS \$100 OR LESS</b>	(3) Total Contributions – this reporting period:	\$ 800.
	(4) Number of contributors – this reporting period:	8
	(5) Total Contributions – Campaign to Date:	\$ 800
	(6) Number of contributors – Campaign to Date:	8

<b>GRAND TOTAL OF ALL CONTRIBUTIONS</b>		
<b>FOR THIS REPORTING PERIOD</b>	(7) Subtotal of non-monetary (in-kind) contributions:	\$ 0
	(8) Subtotal of monetary contributions (Lines 1+ 3 – 7):	\$ 3710.
	<b>(9) TOTAL – This Reporting Period (Lines 7 + 8):</b>	<b>\$ 3710.</b>
<b>CAMPAIGN TO DATE</b>	(10) Subtotal of non-monetary (in-kind) contributions:	\$ 0
	(11) Subtotal of monetary contributions (Lines 2 + 5 – 10):	\$ 4800.
	<b>(12) TOTAL – Campaign to Date (Lines 10 + 11):</b>	<b>\$ 4800.</b>

**EXPENDITURES**

<b>GRAND TOTAL OF ALL EXPENDITURES</b>	<b>TOTAL – This Reporting Period:</b>	\$ 3692.
	<b>TOTAL – Campaign to Date:</b>	\$ 4782.

NOTE: If you have made expenditures for this reporting period, you will need to attach the Details of Expenditures sheet(s)

**LOANS OR OTHER DEBT**

<b>TOTAL PRIVATE LOANS OR OTHER OBLIGATIONS CURRENTLY OUTSTANDING</b>	Total Loans – This Reporting Period:	\$ 0
	Total Loans – Campaign to Date:	\$ 0
<b>TOTAL DEBT/OBLIGATIONS FORGIVEN</b>	Total Loans – This Reporting Period:	\$ 0
	Total Loans – Campaign to Date:	\$ 0

NOTE: If you have loans or other debt outstanding or debt that has been forgiven, you will need to attach the Details of Loans/Other Obligations sheet(s).







## SETTLEMENT AGREEMENT

The State of Vermont (the "State") and the Vermont Democratic Party ("VDP") hereby agree to resolve the campaign finance complaint filed on October 27, 2014, as follows:

WHEREAS, the Vermont Attorney General's Office received a complaint on October 27, 2014, alleging that the VDP had violated campaign finance laws by its activities in supporting Dean Corren's election for lieutenant governor in 2014 while he was receiving public moneys through Vermont campaign finance grants;

WHEREAS, the VDP now wishes to resolve this matter without litigation; and

WHEREAS, the State and the VDP agree that the following facts are true and accurate:

1. VDP is a political party formed pursuant to Title 17, Chapter 45 of the Vermont Statutes Annotated.

2. Dean Corren is an individual who was a candidate for election to the office of lieutenant governor on November 5, 2014. He qualified for public financing for his campaign and received \$180,717 in campaign finance grants from the State of Vermont.

3. As a recipient of public moneys to fund his campaign for election, Corren was prohibited by Vermont law, 17 V.S.A. § 2963(b)(1), from soliciting or receiving contributions or spending money on his campaign from other sources.

4. Under Vermont law, 17 V.S.A. § 2901(4), a contribution is defined as "a payment, distribution, advance, deposit, loan, or gift of money or anything of value, paid or promised to be paid for the purpose of influencing an election . . . or supporting or opposing one or more candidates in any election." A contribution includes "a related campaign expenditure made on the candidate's behalf," which is defined in 17 V.S.A. § 2944(a) & (b) as "any

expenditure intended to promote the election of a specific candidate” that is “intentionally facilitated by, solicited by or approved by” the candidate or the candidate’s campaign committee.

5. A political party that makes a related campaign expenditure on a candidate’s behalf must report that related expenditure on its campaign finance reports filed with the Secretary of State, pursuant to 17 V.S.A. §§ 2963(a)(3)(A), 2964.

6. On September 20, 2014, the VDP endorsed Dean Corren as the Democratic candidate for Lieutenant Governor. The VDP received guidance from the Secretary of State’s Office that the VDP endorsement of Corren presented unique legal issues. VDP officials and staff were told they needed to be extremely careful in their interactions with the Corren campaign because of the prohibition in Vermont law on contributions to publicly financed candidates.

7. In early October 2014, Dean Corren’s campaign manager Megan Brook sent an email to the VDP Chair Dottie Deans and VDP Executive Director Julia Barnes asking if the VDP could assist the Corren campaign by sending an email to the people on their mailing list in support of Dean Corren’s candidacy for election.

8. The VDP Executive Director responded by asking Corren’s campaign manager to “draft something that you would like us to send from Dottie to the list.” On October 13, 2014, Corren’s campaign manager sent the VDP Executive Director and Chair an email with the subject line: “Email message about Dean.” The email contained the draft text of a six-paragraph email message that VDP’s chair could send to the VDP mailing list. The proposed message spoke of the VDP Chair’s support for Dean Corren, explained why she supported him, and listed three specific things people could do to help elect him. A copy is attached as Exhibit A.

9. On October 23 and 24, the two exchanged further emails under the subject line “Corren Email Blast” regarding the text of the draft email message.

10. On October 24, 2014, VDP Chair Deans sent a mass email message with the subject “How you can help me help Dean Corren” to at least 16,000 people on the VDP’s mailing list. The email message included several phrases and sentences that were contained in the draft email that Corren’s campaign manager had sent to the VDP on October 13.

Furthermore, the structure of the email had similarities to the draft that Corren’s campaign manager had given to the VDP. A copy is attached as Exhibit B. The value of the October 24, 2014, email blast was at least \$255.00.

11. The October 24, 2014, mass email was a related expenditure under 17 V.S.A. § 2944(b). Corren’s campaign manager intentionally facilitated and solicited the VDP to send the email message. Pursuant to § 2944(a), this related expenditure is considered a contribution to Corren, the candidate on whose behalf the expenditure was made.

12. The VDP filed a campaign finance report with the Secretary of State’s Office on or about November 3, 2014. In that filing, the VDP did not report the expenditure of any funds for the October 24, 2014, email blast. The VDP did not report the related expenditure of the mass email in its list of expenditures on its November 3, 2014, report, nor did it state the name of the candidate on whose behalf the expenditure was made or the name of the candidate who was supported by the expenditure. 17 V.S.A. § 2963(a)(3)(A). The VDP’s failure to report this related expenditure, especially when made on behalf of a publicly financed candidate, violates 17 V.S.A. § 2963.

WHEREFORE, the State and the VDP agree to settle this matter by taking the following actions:

A. The State covenants and agrees not to sue, or file a complaint or other charge (either civil or criminal) or seek any other legal or administrative enforcement action against, the VDP, its officers, directors, employees, agents, county committees, or town committees, for enforcement of any campaign finance violations related to VDP's interactions with Dean Corren in the 2013-2014 Vermont general election cycle or for VDP's sending any other e-mail to supporters that may have benefited a Democratic candidate or entities who participated in VDP's "coordinated campaign" in the 2013-2014 Vermont general election cycle.

B. VDP agrees to pay \$10,000 to the State as a civil penalty. An initial payment of \$5000 will be due within thirty (30) days of the signing of this Stipulated Settlement, and the balance will be due on July 1, 2015;

C. VDP agrees to file an amended campaign finance report, in form and substance as approved by the Attorney General's Office, with the Vermont Secretary of State disclosing the \$255.00 expenditure on October 24, 2014, and identifying it as a related expenditure within 21 days of signing this Stipulated Settlement; and

D. VDP agrees to cooperate with the Attorney General's Office in connection with the investigation of campaign finance law violations by and litigation of an enforcement action against Dean Corren, if any, arising out of the activities described herein. This includes, but is not limited to, making available VDP's current Chair, Executive Director, Ben Sarle, and Selene Hofer-Shall, and utilizing reasonable efforts to make available VDP's Executive Committee members, staff and contractors, for interviews, depositions and testimony in connection with investigation and litigation by the Attorney General's Office of campaign finance violations by Dean Corren. In addition, VDP shall provide the Attorney General's Office with access to all

documents (including electronic documents) related to its interactions with Dean Corren or the Corren campaign.

Dated in Montpelier, Vermont this 26<sup>th</sup> day of March 2015.

STATE OF VERMONT

WILLIAM H. SORRELL  
ATTORNEY GENERAL

By: Megan J. Shafritz  
Megan J. Shafritz  
Eve Jacobs-Carnahan  
Assistant Attorneys General  
Office of the Attorney General  
109 State Street  
Montpelier, VT 05609-1001  
(802) 828-5527

Dated in Montpelier, Vermont this 25 day of March 2015.

VERMONT DEMOCRATIC PARTY

By: Dottie Deans  
Dottie Deans, Chair  
Vermont Democratic Party  
P.O. Box 1220  
Montpelier, VT 05601-1220

APPROVED AS TO FORM:

Joshua Diamond  
Joshua Diamond, Esq.

EXHIBIT A

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**From:** Megan Brook <[mbro911@gmail.com](mailto:mbro911@gmail.com)>  
**Date:** Mon, Oct 13, 2014 at 8:41 PM  
**Subject:** Email message about Dean  
**To:** Julia Barnes <[jbarnes@vtdemocrats.org](mailto:jbarnes@vtdemocrats.org)>, DDeansVdp <[ddeans@vtdemocrats.org](mailto:ddeans@vtdemocrats.org)>

Hi Dottie and Julia,

Thank you for sending a message about Dean to your email list. I have tried my best to put something together for you but don't know the style of your messages or how you usually communicate. Feel free to edit liberally. Let me know if I can help in other ways and please send me a copy when it goes out, I'm not on the Dem list. I have also attached a photo if you want a visual.

Peace, Meg

Dear Friends,

Many of you know I'm a strong supporter of Dean Corren for Lt. Governor but maybe you don't know why. Dean provides an exciting opportunity for us to address some of the most urgent issues facing Vermonters and has the skills and experience to support our Democratic Party Platform and overcome some of the greatest challenges we face.

Dean decided to enter this race because of his belief that Vermont can lead the nation and do what is right by all Vermonters through the creation of a fairly financed universal healthcare system. Maybe you don't know but Dean served 8 years in the Vermont Legislature and co-wrote the first Single Payer bill in the 1990's. For more on Dean's experience you can watch his TV ad.

Dean has openly shared his positions and ideas for stimulating the economy, supporting job growth and positioning Vermont as a leader in adapting to climate change. He has the endorsement of Senator Sanders, Congressman Welch, Governor Shumlin as well as virtually all the labor organizations, the NEA, environmental organizations, and Bill McKibben!

I believe Dean would make a great Lt. Governor but to make this happen we all need to pitch in. Please help change Vermont's leadership by doing the following three things:

1. **Commit To Vote!** It is imperative every one of you goes to the polls on November 4th or before. High Democratic turn out not only helps Dean, it helps our strong Senate and House candidates and

sends a message to National that Vermonters are active and engaged. You can vote now at your Town Office. Double the fun and bring a friend.

2. **Request a Corren Sign!** Dean's team is set up to deliver a sign to your lawn, simply email [volunteer@deancorren.com](mailto:volunteer@deancorren.com) with your address. If you prefer to get your own sign they can be found at all our field offices.
3. **Tell Your Neighbors!** Writing a letter to the editor or posting a note to your Front Porch Forum is a great way to spread the work about Dean and his vision for Vermont. You can visit his website for information on issues, endorsements or more. If you would like a sample letter to get you started just email [volunteer@deancorren.com](mailto:volunteer@deancorren.com).

Dean has a very active and fun Facebook Page which you can like to receive updates on his activities, volunteer opportunities, press events and more.

I appreciate all the work you are doing on behalf of our candidates around the state and look forward to celebrating great victories with you on the 4th.

--

Meg Brook  
802/343-2604  
[mbro911@gmail.com](mailto:mbro911@gmail.com)

--

Meg Brook  
802/343-2604  
[mbro911@gmail.com](mailto:mbro911@gmail.com)



From: **Julia Barnes** <[jbarnes@vtdemocrats.org](mailto:jbarnes@vtdemocrats.org)>  
Date: Fri, Oct 24, 2014 at 12:48 PM  
Subject: Fwd: How you can help me help Dean Corren  
To: Megan Brook <[mbro911@gmail.com](mailto:mbro911@gmail.com)>

This just went out.

----- Forwarded message -----

From: **Dottie Deans, VDP Chair** <[info@vtdemocrats.org](mailto:info@vtdemocrats.org)>  
Date: Fri, Oct 24, 2014 at 12:47 PM  
Subject: How you can help me help Dean Corren  
To: [info@vtdemocrats.org](mailto:info@vtdemocrats.org)



Dear Friends,

Many of you know I'm a strong supporter of Dean Corren for Lt. Governor but maybe you don't know why. Dean has the skills and experience to support our Vermont Democratic Party Platform and overcome some of the greatest challenges we face.

Dean has openly shared his positions and ideas for stimulating the economy, enacting health care reform, supporting job growth and positioning Vermont to be a leader in taking on climate change. In addition, he has been enthusiastically endorsed by the Vermont Democratic Party's State Committee and some of our most prominent leaders.

I believe Dean would make an excellent Lt. Governor, but to make this happen we all need to pitch in. Here are a few ways you can help.

1. **Come to a Rally!** This weekend we are joining Senator Bernie Sanders, Governor Peter Shumlin, Dean and local candidates at four GOTV rallies across the state. Come

to one nearest to you!

Saturday October 25, 9:30 am Brunch, 10:00 am Meeting Begins  
Holley Hall  
1 South St.  
Bristol, VT

Saturday October 25, 2:00 pm, Coffee and Desserts  
VT Marble Museum  
52 Main St  
Proctor, VT

Sunday October 26, 10:00 am Brunch, 10:30 am Meeting  
Champlain Valley Union High School  
69 CVU Road  
Hinesburg, VT

Sunday October 26, 5:30 pm Dinner, 6:00 pm Meeting  
St. Albans Historical Museum  
9 Church St,  
St. Albans VT

2. **Commit To VOTE!** Make a plan, vote early by visiting your town clerk's office, or vote on Tuesday, November 4th. To find your polling location, [click here](#).

3. **Tell Your Neighbors!** We are working every day to talk to voters in Vermont into getting to the polls on Election Day. [Sign up to volunteer for a shift here](#). For other ways to help, please email [volunteer@deancorren.com](mailto:volunteer@deancorren.com)

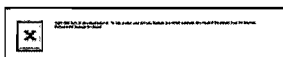
I appreciate all the work you are doing on behalf of our candidates around the state and look forward to celebrating great victories with you on the 4th. Now get out and vote for Congressman Peter Welch, Governor Peter Shumlin, Dean Corren for Lieutenant Governor, and the rest of our amazing Democratic ticket!

Warmly,

Dottie

Paid for by the Vermont Democratic Party and not authorized by any candidate or candidate's committee.  
[www.vtdemocrats.org](http://www.vtdemocrats.org)

PO Box 1220  
Montpelier, VT 05601



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POWERED BY [NGP VAN, INC.](#)

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**Julia Barnes**

Executive Director  
Vermont Democratic Party  
cell: [802.448.2618](tel:802.448.2618)



*NOTICE: This e-mail contains information intended only for the addressee named. Disclosure or use of the contents of this e-mail without the express consent of the sender is prohibited. If you have received this e-mail in error, please notify the sender immediately via return email. Thank you.*

--

Meg Brook  
802/343-2604  
[mbro911@gmail.com](mailto:mbro911@gmail.com)

## SETTLEMENT AGREEMENT

The State of Vermont (the "State") and Chris Shaw ("Shaw") hereby agree to resolve the campaign finance complaint as follows:

WHEREAS, the Vermont Attorney General's Office received a complaint on August 22, 2013, regarding advertising for candidates for election to the South Burlington city council in March 2013;

WHEREAS, Shaw attempted in good faith to comply with Vermont's campaign finance laws and now wishes to resolve this matter without litigation; and

WHEREAS, the State and Shaw agree that the following facts are true and accurate:

1. Shaw was a candidate for election to the South Burlington City Council in March of 2013.
2. Pam Pac is a Vermont political committee that made expenditures in support of candidates in the 2013 South Burlington City Council election. Pamela Mackenzie was the treasurer and contact person of Pam Pac.
3. Pam Pac purchased three advertisements in The Other Paper, dated February 14, 21, and 28, 2013, and one advertisement in the Burlington Free Press dated March 1, 2013, that expressly advocated for the election of Shaw to city council.
4. The cost of these advertisements purchased by Pam Pac was \$4,782.
5. Pamela Mackenzie contacted Shaw and offered to assist in his election campaign. Shaw accepted and approved her assistance by, among other things, discussing campaign strategy with her and participating in planning advertisements. Shaw approved of the advertisements that Pam Pac purchased and ran in the weeks preceding the city council election. Three of the ads were virtually identical and

listed names of people who supported Shaw's election; Shaw assisted in recruiting people to have their names listed in the ads.

6. Shaw did not include these in-kind contributions on the campaign finance reports he filed with the city clerk of South Burlington.

WHEREAS, the State adopts the following conclusions of law, and Shaw disagrees with the conclusions of law but chooses not to undertake the burden and expense of contesting them:

1. The activities of Shaw in intentionally facilitating, soliciting, and approving these advertisements makes them related expenditures as defined in 17 V.S.A. § 2809(c).
2. Related expenditures are considered contributions to the candidate on whose behalf the expenditure is made, pursuant to 17 V.S.A. § 2809(a). The value of these in-kind contributions by Pam Pac to Shaw's campaign was \$4,782.
3. Shaw was required to report in-kind contributions he received on campaign finance reports filed with the city clerk of South Burlington, pursuant to 17 V.S.A. §§ 2803 & 2822. Shaw violated this statute by failing to include the contributions on his reports.
4. The limit on contributions that a local candidate could accept from a political committee in 2013 was \$3,000 per election. 17 V.S.A. 2805(h) as amended by 1987 Vt. Acts & Resolves 263, § 3 (Adj. Sess.). Shaw violated this statute by accepting contributions in excess of the limit on contributions from political committees.

NOW THEREFORE, the State and Shaw agree to settle this matter by taking the following actions:

A. the State covenants and agrees not to sue, or file a complaint or other charge (either civil or criminal) or seek any other legal or administrative enforcement action against, Shaw related to his activities in the March 2013 South Burlington City Council election.

B. Shaw agrees to pay \$750 to the State as a civil penalty within thirty (30) days of the signing of this Stipulated Settlement;

C. Shaw agrees to file amended campaign finance reports, in form and substance as attached hereto, with the South Burlington City Clerk covering the March 2013 South Burlington City Council election within 21 days of signing this Settlement Agreement.

Dated in Montpelier, Vermont this 2nd day of April 2015.

STATE OF VERMONT

WILLIAM H. SORRELL  
ATTORNEY GENERAL

By: Eve Jacobs-Carnahan  
Eve Jacobs-Carnahan  
Assistant Attorney General  
Office of the Attorney General  
109 State Street  
Montpelier, VT 05609-1001  
(802) 828-3176

*SOUTH BURLINGTON*  
Dated in Montpelier, Vermont this 3<sup>RD</sup> day of April 2015.

CHRIS SHAW

By: Chris Shaw  
Chris Shaw  
South Burlington, VT

Approved as to form:

A handwritten signature in black ink, appearing to read 'E.M. Fallon', written over a horizontal line.

Ellen Mercer Fallon, Esq.  
Langrock, Sperry & Wool  
P.O. Drawer 351  
Middlebury, VT 05753  
Attorneys for Chris Shaw

6470141

CAMPAIGN FINANCE DISCLOSURE FORM

CERTIFICATION OF CANDIDATES FOR STATE OFFICE, GENERAL ASSEMBLY, COUNTY OFFICE AND LOCAL OFFICE

CANDIDATE NAME: Chris Shaw

CAMPAIGN NAME: Chris Shaw for City Council

ADDRESS: 57 Moss Glen Lane TOWN: South Burlington STATE: VT ZIP: 05403

TELEPHONE: (802) 864-1515 PARTY AFFILIATION: n/a

OFFICE SOUGHT (CHECK ONE ONLY):

STATE OFFICE:  GOVERNOR  LT. GOVERNOR  TREASURER  SECRETARY OF STATE  AUDITOR

ATTORNEY GENERAL

GENERAL ASSEMBLY:  STATE SENATE  STATE REPRESENTATIVE

THIS MY REPORT DUE: FINAL REPORT (Fill in date)

LOCAL OFFICE: City Clerk, South Burlington THIS IS MY REPORT DUE: 10 days prior to election. Date filed:  
10 days after election. Date filed:

ALL CANDIDATES: This report amends one previously filed on: \_\_\_\_\_ (ONLY if changing a PREVIOUSLY FILED report.)

SURPLUS OR CARRYFORWARD FROM previous campaign: TOTAL surplus from \_\_\_\_\_: \$ \_\_\_\_\_  
TOTAL CARRYFORWARD to current campaign (surplus - donations + interest =): \$ \_\_\_\_\_

I HAVE COMPLETED AND ATTACHED THE FOLLOWING FORMS for this reporting period:

- Certification of Candidate – This sheet (REQUIRED)  Contribution & Expenditure Summary (REQUIRED)
- Details of Contributions Over \$100 (As needed)  Details of Expenditures (As needed)
- Details of Debt/Obligation Outstanding or Discharged/Forgiven (As needed)

**XX FINAL REPORT:** This is my FINAL REPORT for the current Campaign Cycle and closes out my current campaign by indicating the disposition of any surplus or debt, and all contributions and expenditures for this cycle are accounted for. (Only check when filing final report.) Note: A FINAL REPORT is required to close out a campaign. This does NOT mean that your account must be closed.

CHECK ONE ONLY:

I have \$0 surplus from the current campaign and this amount will be carried forward to the new campaign.

Surplus funds from the current campaign in the amount of \$ \_\_\_\_\_ have been donated to the charity, candidate, PAC or political party listed in the attached Details of Expenditures sheet, leaving a balance of \$0.

I hereby certify that the information provided on all pages of this campaign finance disclosure report is true to the best of my knowledge, information and belief.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Candidate OR Treasurer Signature

\_\_\_\_\_  
Name of person signing form (PRINT)

Office of the Vermont Secretary of State  
Elections Division  
128 State Street  
Montpelier, VT 05633-1101  
(802) 828-2363



Name of candidate: Chris Shaw

**CONTRIBUTION and EXPENDITURE SUMMARY**

**CONTRIBUTIONS**

**CONTRIBUTIONS BY CANDIDATE OR IMMEDIATE FAMILY**

Total Contributions for this reporting period:	\$ 1711.97
Total Contributions, Campaign to Date:	\$ 3711.97

NOTE: The contributions by Candidate or Immediate Family should also be included in the Contributions Over \$100 and Contributions \$100 or Less figures below.

<b>CONTRIBUTIONS OVER \$100</b>	(1) Total Contributions for this reporting period:	\$ 1711.97
	(2) Total Contributions, Campaign to Date:	\$ 4411.97

NOTE: If you received contributions over \$100, you will also need to attach the Details of Contributions Over \$100 sheet(s).

<b>CONTRIBUTIONS \$100 OR LESS</b>	(3) Total Contributions for this reporting period:	\$ 50
	(4) Number of contributors for this reporting period:	1
	(5) Total Contributions, Campaign to Date:	\$ 1425
	(6) Number of contributors, Campaign to Date:	19

**GRAND TOTAL OF ALL CONTRIBUTIONS**

<b>FOR THIS REPORTING PERIOD</b>	(7) Subtotal of non-monetary (in-kind) contributions:	\$ 0
	(8) Subtotal of monetary contributions (Lines 1 + 3):	\$ 1761.97
	(9) <b>TOTAL For This Reporting Period (Lines 7 + 8):</b>	\$ 1761.97
<b>CAMPAIGN TO DATE</b>	(10) Subtotal of non-monetary (in-kind) contributions:	\$ 4911
	(11) Subtotal of monetary contributions (Lines 2 + 5):	\$ 5836.97
	(12) <b>TOTAL, Campaign to Date (Lines 10 + 11):</b>	\$ 10,747.97

**EXPENDITURES**

<b>GRAND TOTAL OF ALL EXPENDITURES</b>	<b>TOTAL For This Reporting Period:</b>	\$ 905.88
	<b>TOTAL, Campaign to Date:</b>	\$ 7493.80

NOTE: If you have made expenditures for this reporting period, you will need to attach the Details of Expenditures sheet(s)

**LOANS OR OTHER DEBT**

<b>TOTAL PRIVATE LOANS OR OTHER OBLIGATIONS CURRENTLY OUTSTANDING</b>	Total Loans For This Reporting Period:	\$ 1711.97
	Total Loans, Campaign to Date:	\$ 4329.82
<b>TOTAL DEBT/OBLIGATIONS FORGIVEN</b>	Total Loans For This Reporting Period:	\$ 905.88
	Total Loans, Campaign to Date:	\$ 905.88

NOTE: If you have loans or other debt outstanding or debt that has been forgiven, you will need to attach the Details of Loans/Other Obligations sheet(s).







CAMPAIGN FINANCE DISCLOSURE FORM  
CERTIFICATION OF CANDIDATES FOR STATE OFFICE, GENERAL ASSEMBLY, COUNTY OFFICE  
AND LOCAL OFFICE

CANDIDATE NAME: Chris Shaw

CAMPAIGN NAME: Chris Shaw for City Council

ADDRESS: 57 Moss Glen Lane TOWN: South Burlington STATE:  VT ZIP: 05403

TELEPHONE: (802) 864-1515 PARTY AFFILIATION: n/a

OFFICE SOUGHT (CHECK ONE ONLY):

STATE OFFICE:  GOVERNOR  LT. GOVERNOR  TREASURER  SECRETARY OF STATE  AUDITOR  
 ATTORNEY GENERAL

GENERAL ASSEMBLY:  STATE SENATE  STATE REPRESENTATIVE  LOCAL:  CITY COUNCIL (3 YEAR TERM)

THIS MY REPORT DUE: 10 days before election (2/25/13) (Fill in date)

LOCAL OFFICE: City Clerk, South Burlington THIS IS MY REPORT DUE:  10 days prior to election. Date filed: 2/25/13  
 10 days after election. Date filed: \_\_\_\_\_

ALL CANDIDATES: This report amends one previously filed on: 2/25/13 (ONLY if changing a PREVIOUSLY FILED report.)

SURPLUS OR CARRYFORWARD FROM previous campaign: TOTAL surplus from \_\_\_\_\_; \$ \_\_\_\_\_  
TOTAL CARRYFORWARD to current campaign (surplus - donations + interest =): \$ \_\_\_\_\_

I HAVE COMPLETED AND ATTACHED THE FOLLOWING FORMS for this reporting period:

- Certification of Candidate - This sheet (REQUIRED)  Contribution & Expenditure Summary (REQUIRED)
- Details of Contributions Over \$100 (As needed)  Details of Expenditures (As needed)
- Details of Debt/Obligation Outstanding or Discharged/Forgiven (As needed)

     FINAL REPORT: This is my FINAL REPORT for the current Campaign Cycle and closes out my current campaign by indicating the disposition of any surplus or debt, and all contributions and expenditures for this cycle are accounted for. (Only check when filing final report.) Note: A FINAL REPORT is required to close out a campaign. This does NOT mean that your account must be closed.

CHECK ONE ONLY:

     I have \$ \_\_\_\_\_ surplus from the current campaign and this amount will be carried forward to the new campaign.

     Surplus funds from the current campaign in the amount of \$ \_\_\_\_\_ have been donated to the charity, candidate, PAC or political party listed in the attached Details of Expenditures sheet, leaving a balance of \$0.

I hereby certify that the information provided on all pages of this campaign finance disclosure report is true to the best of my knowledge, information and belief.

CHRIS SHAW

\_\_\_\_\_  
Date

\_\_\_\_\_  
Candidate OR Treasurer Signature

\_\_\_\_\_  
Name of person signing form (PRINT)

Office of the Vermont Secretary of State  
Elections Division  
128 State Street  
Montpelier, VT 05633-1101  
(802) 828-2363

Name of candidate: Chris Shaw

**CONTRIBUTION and EXPENDITURE SUMMARY**

**CONTRIBUTIONS**

<b>CONTRIBUTIONS BY CANDIDATE OR IMMEDIATE FAMILY</b>	
Total Contributions for this reporting period:	\$ 2000
Total Contributions, Campaign to Date:	\$ 2000

NOTE: The contributions by Candidate or Immediate Family should also be included in the Contributions Over \$100 and Contributions \$100 or Less figures below.

<b>CONTRIBUTIONS OVER \$100</b>	(1) Total Contributions for this reporting period:	\$ 2500
	(2) Total Contributions, Campaign to Date:	\$ 2500

NOTE: If you received contributions over \$100, you will also need to attach the Details of Contributions Over \$100 sheet(s).

<b>CONTRIBUTIONS \$100 OR LESS</b>	(3) Total Contributions for this reporting period:	\$ 1025
	(4) Number of contributors for this reporting period:	13
	(5) Total Contributions, Campaign to Date:	\$ 1025
	(6) Number of contributors, Campaign to Date:	13

**GRAND TOTAL OF ALL CONTRIBUTIONS**

<b>FOR THIS REPORTING PERIOD</b>	(7) Subtotal of non-monetary (in-kind) contributions:	\$ 2309
	(8) Subtotal of monetary contributions (Lines 1 + 3):	\$ 3525
	<b>(9) TOTAL For This Reporting Period (Lines 7 + 8):</b>	<b>\$ 5834</b>
<b>CAMPAIGN TO DATE</b>	(10) Subtotal of non-monetary (in-kind) contributions:	\$ 2309
	(11) Subtotal of monetary contributions (Lines 2 + 5):	\$ 3525
	<b>(12) TOTAL, Campaign to Date (Lines 10 + 11):</b>	<b>\$ 5834</b>

**EXPENDITURES**

<b>GRAND TOTAL OF ALL EXPENDITURES</b>	<b>TOTAL For This Reporting Period:</b>	\$ 4816.78
	<b>TOTAL, Campaign to Date:</b>	\$ 4816.78

NOTE: If you have made expenditures for this reporting period, you will need to attach the Details of Expenditures sheet(s)

**LOANS OR OTHER DEBT**

<b>TOTAL PRIVATE LOANS OR OTHER OBLIGATIONS CURRENTLY OUTSTANDING</b>	Total Loans For This Reporting Period:	\$ 2617.85
	Total Loans, Campaign to Date:	\$ 2617.85
<b>TOTAL DEBT/OBLIGATIONS FORGIVEN</b>	Total Loans For This Reporting Period:	\$
	Total Loans, Campaign to Date:	\$

NOTE: If you have loans or other debt outstanding or debt that has been forgiven, you will need to attach the Details of Loans/Other Obligations sheet(s).

CAMPAIGN FINANCE DISCLOSURE REPORT - DETAILS OF CONTRIBUTIONS OVER \$100 Page 3 of 5

Date of Contribution Jan/Feb/Mar/Apr/May/June/July/Aug/Sept/Oct/Nov/Dec	Amount of Contribution	Contributor's Total Contributions to Date	Name of Contributor	Address	Town/City	State	Zip	If In-kind Contribution, Please Describe	Town of Residence
	129 (in-kind)	129 (in-kind)	University Mall	205 Dorset St.	S. Burlington	VT	05403	Use of shared kiosk 6 days (1/26; 2/2;2/9;2/16;2/23;3/2) at Umail (\$1200/28 = \$43 x 6 = \$258 (1/2 = \$129)	S. Burlington
2/19/2013	\$500.00	\$500	Shearer Chevrolet	1675 Shelburne Rd.	S. Burlington	VT	05403		S. Burlington
2/14/2013	\$1,000.00	\$1,000	Dale D. Shaw	100 Old Billerica Rd	Bedford	Ma	01730	immediate family	Bedford Ma.
2/14/2013	\$1,000.00	\$1,000	Chris Shaw	57 Moss Glen Lane	S. Burlington	Vt	05403	candidate -- self	S. Burlington
2/14/13	\$1090	\$1090	PamPac	40 Hummingbird Lane	S. Burlington	VT	05403	advertising	S. Burlington
2/21/13	\$1090	\$2180	PamPac	40 Hummingbird Lane	S. Burlington	VT	05403	(The Other Paper) advertising (The other Paper)	S. Burlington

Name of candidate or PAC: CHRIS SHAW

**CAMPAIGN FINANCE DISCLOSURE REPORT - DETAILS OF EXPENDITURES** Page 4 of 5

Note: Expenditures occur on both a cash basis and an accrual basis; report whichever occurs first. You must report expenses when promised to be paid or when payment is disbursed, which ever occurs first. 17 V.S.A. §2801(3)

Date of Expenditure	Amount of Expenditure	To Whom Paid	Address	Town/City	State	Zip	Purpose of Expenditure
1/31/2013	\$330.00	The Other Paper	1340 Williston Road	S. Burlington	VT	05403	newspaper ad
2/6/2013	\$803.74	Paw Print & Mail	12 Gregory Dr, Ste 8	S. Burlington	VT	05403	brochure rack cards & doorhangers cards
2/7/2013	\$322.50	Sign Depot	1813 E.Colonial Dr	Orlando	FL	32803	lawn signs
2/7/2013	\$330.00	The Other Paper	1340 Williston Road	S. Burlington	VT	05403	newspaper ad
2/10/2013	\$55.99	The UPS Store	150 Dorset Street	S. Burlington	VT	05403	copies & stamps
2/11/2013	\$360.00	Paw Print & Mail	12 Gregory Dr, Ste 8	S. Burlington	VT	05403	ad design
2/13/2013	\$316.22	Paw Print & Mail	12 Gregory Dr, Ste 8	S. Burlington	VT	05403	Rack Cards
2/14/2013	\$425.00	The Other Paper	1340 Williston Road	S. Burlington	VT	05403	newspaper ad
2/16/2013	\$20.71	Dunkin Donuts	155 Dorset Street	S. Burlington	VT	05403	coffee & donuts
2/19/2013	\$330.00	US Postal Service	82 Blair Park Road	Williston	VT	05495	stamps
2/20/2013	\$520.00	The Other Paper	1340 Williston Road	S. Burlington	VT	05403	newspaper ad
2/20/2013	\$140.00	The Other Paper	1340 Williston Road	S. Burlington	VT	05403	newspaper ad
2/19/2013	\$180.00	Front Porch Forum	PO Box 64781	Burlington	VT	05406	Ad
2/22/2013	\$60.00	Paw Print & Mail	12 Gregory Dr, Ste 8	S. Burlington	VT	05403	ad design
2/5/2013	\$157.50	Fast Color Printer	2390 26th North Ave.	St. Petersburg	FL	33713	postcards
2/7/2013	\$46.00	US Postal Service	82 Blair Park Road	Williston	VT	05495	stamps
1/26/2013	\$8.00	Dunkin Donuts	155 Dorset Street	S. Burlington	VT	05403	coffee & donuts
2/14/2013	\$71.00	The Other Paper	1340 Williston Road	S. Burlington	VT	05403	newspaper ad
2/14/2013	\$96.00	The Other Paper	1340 Williston Road	S. Burlington	VT	05403	newspaper ad
2/11/2013	\$61.67	Uline	12575 Uline Rd.	Pleasant Prairie	MN	53158	plastic bags
2/1/2013	\$25.00	Banners Unlimited	339 Patchen Rd.	S. Burlington	VT	05403	lawn signs
1/20/2013	\$14.44	Staples	1375 Mapletree Place	Williston	VT	05495	labels
1/31/2013	\$5.62	Staples	1375 Mapletree Place	Williston	VT	05495	envelopes
2/9/2013	\$13.36	Dunkin Donuts	155 Dorset Street	S. Burlington	VT	05403	coffee & donuts
2/22/2013	\$11.28	Dunkin Donuts	155 Dorset Street	S. Burlington	VT	05403	coffee & donuts
2/2/2013	\$10.73	Dunkin Donuts	155 Dorset Street	S. Burlington	VT	05403	coffee & donuts
2/18/2013	\$69.55	The UPS Store	29 Tafts Corners Shopping Center	Williston	VT	05495	copies
2/15/2013	\$28.57	Staples	861 Williston Road	South Burlington	VT	05403	hand stamp
2/19/2013	\$3.90	Facebook	PO Box 10005 Dept 415	Palo Alto	CA	94303	ad
	\$4,816.78	total					

Name of candidate or PAC: \_\_\_\_\_





CAMPAIGN FINANCE DISCLOSURE FORM

CERTIFICATION OF CANDIDATES FOR STATE OFFICE, GENERAL ASSEMBLY, COUNTY OFFICE AND LOCAL OFFICE

CANDIDATE NAME: Chris Shaw

CAMPAIGN NAME: Chris Shaw for City Council

ADDRESS: 57 Moss Glen Lane TOWN: South Burlington STATE: VT ZIP: 05403

TELEPHONE: (802) 864-1515 PARTY AFFILIATION: n/a

OFFICE SOUGHT (CHECK ONE ONLY):

STATE OFFICE: GOVERNOR LT. GOVERNOR TREASURER SECRETARY OF STATE AUDITOR

ATTORNEY GENERAL

GENERAL ASSEMBLY: STATE SENATE STATE REPRESENTATIVE

LOCAL OFFICE: CITY COUNCIL

THIS MY REPORT DUE: 10 days before election (2013) 3/15/13 (Fill in date) AFTER

LOCAL OFFICE: City Clerk, South Burlington THIS IS MY REPORT DUE: 10 days prior to election. Date filed: 3/15/13 10 days after election. Date filed: 3/15/13

ALL CANDIDATES: This report amends one previously filed on: 3/15/13 (ONLY if changing a PREVIOUSLY FILED report.)

SURPLUS OR CARRYFORWARD FROM previous campaign: TOTAL surplus from \$ TOTAL CARRYFORWARD to current campaign (surplus - donations + interest =): \$

I HAVE COMPLETED AND ATTACHED THE FOLLOWING FORMS for this reporting period:

- Certification of Candidate - This sheet (REQUIRED) Contribution & Expenditure Summary (REQUIRED)
Details of Contributions Over \$100 (As needed) Details of Expenditures (As needed)
Details of Debt/Obligation Outstanding or Discharged/Forgiven (As needed)

FINAL REPORT: This is my FINAL REPORT for the current Campaign Cycle and closes out my current campaign by indicating the disposition of any surplus or debt, and all contributions and expenditures for this cycle are accounted for. (Only check when filing final report.) Note: A FINAL REPORT is required to close out a campaign. This does NOT mean that your account must be closed.

CHECK ONE ONLY:

I have \$ surplus from the current campaign and this amount will be carried forward to the new campaign.
Surplus funds from the current campaign in the amount of \$ have been donated to the charity, candidate, PAC or political party listed in the attached Details of Expenditures sheet, leaving a balance of \$0.

I hereby certify that the information provided on all pages of this campaign finance disclosure report is true to the best of my knowledge, information and belief.

Date

Candidate OR Treasurer Signature

CHRIS SHAW Name of person signing form (PRINT)

Office of the Vermont Secretary of State
Elections Division
128 State Street
Montpelier, VT 05633-1101
(802) 878-2763

Name of candidate: Chris Shaw

**CONTRIBUTION and EXPENDITURE SUMMARY**

**CONTRIBUTIONS**

<b>CONTRIBUTIONS BY CANDIDATE OR IMMEDIATE FAMILY</b>	
Total Contributions for this reporting period:	\$ 0
Total Contributions, Campaign to Date:	\$ 2000

NOTE: The contributions by Candidate or Immediate Family should also be included in the Contributions Over \$100 and Contributions \$100 or Less figures below.

<b>CONTRIBUTIONS OVER \$100</b>	(1) Total Contributions for this reporting period:	\$ 200
	(2) Total Contributions, Campaign to Date:	\$ 2700

NOTE: If you received contributions over \$100, you will also need to attach the Details of Contributions Over \$100 sheet(s).

<b>CONTRIBUTIONS \$100 OR LESS</b>	(3) Total Contributions for this reporting period:	\$ 350
	(4) Number of contributors for this reporting period:	5
	(5) Total Contributions, Campaign to Date:	\$ 1375
	(6) Number of contributors, Campaign to Date:	18

**GRAND TOTAL OF ALL CONTRIBUTIONS**

<b>FOR THIS REPORTING PERIOD</b>	(7) Subtotal of non-monetary (in-kind) contributions:	\$2602
	(8) Subtotal of monetary contributions (Lines 1 + 3):	\$ 550
	(9) <b>TOTAL For This Reporting Period (Lines 7 + 8):</b>	<b>\$ 3152</b>
<b>CAMPAIGN TO DATE</b>	(10) Subtotal of non-monetary (in-kind) contributions:	\$4911
	(11) Subtotal of monetary contributions (Lines 2 + 5):	\$4075
	(12) <b>TOTAL, Campaign to Date (Lines 10 + 11):</b>	<b>\$ 8986</b>

**EXPENDITURES**

<b>GRAND TOTAL OF ALL EXPENDITURES</b>	<b>TOTAL For This Reporting Period:</b>	\$ 1771.14
	<b>TOTAL, Campaign to Date:</b>	<b>\$ 6587.92</b>

NOTE: If you have made expenditures for this reporting period, you will need to attach the Details of Expenditures sheet(s)

**LOANS OR OTHER DEBT**

<b>TOTAL PRIVATE LOANS OR OTHER OBLIGATIONS CURRENTLY OUTSTANDING</b>	Total Loans For This Reporting Period:	\$ 0
	Total Loans, Campaign to Date:	\$ 2617.85
<b>TOTAL DEBT/OBLIGATIONS FORGIVEN</b>	Total Loans For This Reporting Period:	\$
	Total Loans, Campaign to Date:	\$

NOTE: If you have loans or other debt outstanding or debt that has been forgiven, you will need to attach the Details of Loans/Other





**CAMPAIGN FINANCE DISCLOSURE REPORT - DETAILS OF EXPENDITURES** Page 5 of 5

Note: Expenditures occur on both a cash basis and an accrual basis; report whichever occurs first. You must report expenses when promised to be paid or when payment is disbursed, which ever occurs first. 17 V.S.A. §2801(3)

Date of Expenditure	Amount of Expenditure	To Whom Paid	Address	Town/City	State	Zip	Purpose of Expenditure
2/27/2013	\$462.00	US Postal Service	Champlain Station -- 370 Shelburne Rd. #4	Burlington	VT	05401	stamps
2/27/2013	\$396.00	US Postal Service	82 Blair Park Road	Williston	VT	05495	stamps
2/26/2013	\$12.03	Facebook	PO Box 10005 Dept 415	Palo Alto	CA	94303	ad
2/27/2013	\$383.85	Paw Print & Mail	12 Gregory Dr, Ste 8	S. Burlington	VT	05403	postcards
3/5/2013	\$90.69	Zachary's Pizza	1250 Williston Road	South Burlington	VT	05403	pizza and drinks for supporters
2/28/2013	\$169.07	The Offset House, Inc.	PO Box 8329	Essex	VT	05451	signs
3/1/2013	\$257.50	95TripleX -- WXXX-FM	PO Box 620	Colchester	VT	05446	radio ads
	\$1,771.14						

Name of candidate or PAC: \_\_\_\_\_

## SETTLEMENT AGREEMENT

The State of Vermont (the "State") and Patricia Nowak ("Nowak") hereby agree to resolve the campaign finance complaint as follows:

WHEREAS, the Vermont Attorney General's Office received a complaint on August 22, 2013, regarding advertising for candidates for election to the South Burlington city council in March 2013;

WHEREAS, Nowak attempted in good faith to comply with Vermont's campaign finance laws and now wishes to resolve this matter without litigation; and

WHEREAS, the State and Nowak agree that the following facts are true and accurate:

1. Nowak was a candidate for election to the South Burlington City Council in March of 2013.
2. Pam Pac is a Vermont political committee that made expenditures in support of candidates in the 2013 South Burlington City Council election. Pamela Mackenzie was the treasurer and contact person of Pam Pac.
3. Pam Pac purchased three advertisements in The Other Paper, dated February 14, 21, and 28, 2013, and one advertisement in the Burlington Free Press dated March 1, 2013, that expressly advocated for the election of Nowak to city council.
4. The cost of these advertisements purchased by Pam Pac was \$4,782.
5. Pamela Mackenzie contacted Nowak and offered to assist in her election campaign. Nowak accepted and approved her assistance by, among other things, discussing campaign strategy with her and participating in planning advertisements. Nowak approved of the advertisements that Pam Pac purchased and ran in the weeks preceding the city council election. Three of the ads were

virtually identical and listed names of people who supported Nowak's election; Nowak assisted in recruiting people to have their names listed in the ads.

6. Nowak did not include these in-kind contributions on the campaign finance reports she filed with the city clerk of South Burlington.

WHEREAS, the State adopts the following conclusions of law, and Nowak disagrees with the conclusions of law but chooses not to undertake the burden and expense of contesting them:

1. The activities of Nowak in intentionally facilitating, soliciting, and approving these advertisements makes them related expenditures as defined in 17 V.S.A. § 2809(c).
2. Related expenditures are considered contributions to the candidate on whose behalf the expenditure is made, pursuant to 17 V.S.A. § 2809(a). The value of these in-kind contributions by Pam Pac to Nowak's campaign was \$4,782.
3. Nowak was required to report in-kind contributions he received on campaign finance reports filed with the city clerk of South Burlington, pursuant to 17 V.S.A. §§ 2803 & 2822. Nowak violated this statute by failing to include the contributions on her reports.
4. The limit on contributions that a local candidate could accept from a political committee in 2013 was \$3,000 per election. 17 V.S.A. 2805(b) as amended by 1987 Vt. Acts & Resolves 263, § 3 (Adj. Sess.). Nowak violated this statute by accepting contributions in excess of the limit on contributions from political committees.



NOW THEREFORE, the State and Nowak agree to settle this matter by taking the following actions:

- A. the State covenants and agrees not to sue, or file a complaint or other charge (either civil or criminal) or seek any other legal or administrative enforcement action against, Nowak related to her activities in the March 2013 South Burlington City Council election.
- B. Nowak agrees to pay \$750 to the State as a civil penalty within thirty (30) days of the signing of this Stipulated Settlement;
- C. Nowak agrees to file amended campaign finance reports, in form and substance as attached hereto , with the South Burlington City Clerk covering the March 2013 South Burlington City Council election within 21 days of signing this Settlement Agreement.

Dated in Montpelier, Vermont this 2nd day of April 2015.

STATE OF VERMONT

WILLIAM H. SORRELL  
ATTORNEY GENERAL

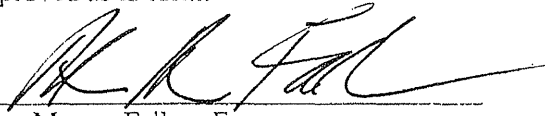
By: *Eve Jacobs-Carnahan*  
Eve Jacobs-Carnahan  
Assistant Attorney General  
Office of the Attorney General  
109 State Street  
Montpelier, VT 05609-1001  
(802) 828-3176

SN Williston RD  
Dated in ~~Montpelier~~, Vermont this 3 day of April 2015.

PATRICIA NOWAK

By: *Patricia Nowak*  
Patricia Nowak  
South Burlington, VT

Approved as to form:

A handwritten signature in black ink, appearing to read 'EM Fallon', written over a horizontal line.

Ellen Mercer Fallon, Esq.  
Langrock, Sperry & Wool  
P.O. Drawer 351  
Middlebury, VT 05753  
Attorneys for Patricia Nowak

647014.1

AMENDED  
*Amended 2/28/13*



CAMPAIGN FINANCE DISCLOSURE FORM  
CERTIFICATION OF CANDIDATES FOR STATE OFFICE, GENERAL ASSEMBLY, COUNTY OFFICE  
AND LOCAL OFFICE

Page 1 of 6

CANDIDATE NAME: Patricia A. Nowak

CAMPAIGN NAME: Pat Nowak for City Council

ADDRESS: 33 Blair Park Rd Ste 103 TOWN: Williston STATE:  VT ZIP: 05495

TELEPHONE: 802 879-1553 PARTY AFFILIATION: N/A

OFFICE SOUGHT (CHECK ONE ONLY):

STATE OFFICE:  GOVERNOR  LT. GOVERNOR  TREASURER  SECRETARY OF STATE  AUDITOR  
 ATTORNEY GENERAL

GENERAL ASSEMBLY:  STATE SENATE  STATE REPRESENTATIVE

THIS MY REPORT DUE: February 25, 2013 AMENDED 2/28/2013 (Fill in date)

LOCAL OFFICE: City Council So Burlington THIS IS MY REPORT DUE:  10 days prior to election. Date filed: 2-25-13  
 10 days after election. Date filed: \_\_\_\_\_

ALL CANDIDATES: This report amends one previously filed on: 2/25/13 Amended 2/28/13 (ONLY if changing a PREVIOUSLY FILED report.)

SURPLUS OR CARRYFORWARD FROM previous campaign: TOTAL surplus from N/A; \$ N/A  
TOTAL CARRYFORWARD to current campaign (surplus - donations + interest =): \$ N/A

I HAVE COMPLETED AND ATTACHED THE FOLLOWING FORMS for this reporting period:

Certification of Candidate - This sheet (REQUIRED)  Contribution & Expenditure Summary (REQUIRED)  
 Details of Contributions Over \$100 (As needed)  Details of Expenditures (As needed)  
 Details of Debt/Obligation Outstanding or Discharged/Forgiven (As needed)

FINAL REPORT: This is my FINAL REPORT for the current Campaign Cycle and closes out my current campaign by indicating the disposition of any surplus or debt, and all contributions and expenditures for this cycle are accounted for. (Only check when filing final report.) Note: A FINAL REPORT is required to close out a campaign. This does NOT mean that your account must be closed.

CHECK ONE ONLY:

I have \$ \_\_\_\_\_ surplus from the current campaign and this amount will be carried forward to the new campaign.

Surplus funds from the current campaign in the amount of \$ \_\_\_\_\_ have been donated to the charity, candidate, PAC or political party listed in the attached Details of Expenditures sheet, leaving a balance of \$0.

I hereby certify that the information provided on all pages of this campaign finance disclosure report is true to the best of my knowledge, information and belief.

Date \_\_\_\_\_

Candidate OR Treasurer Signature \_\_\_\_\_

Name of person signing form (PRINT) \_\_\_\_\_

Office of the Vermont Secretary of State  
Elections Division  
128 State Street  
Montpelier, VT 05633-1101  
(802) 828-2363

Amended 2/28/13

Name of candidate: Patricia A. Nowak

**CONTRIBUTION and EXPENDITURE SUMMARY**

**CONTRIBUTIONS**

<b>CONTRIBUTIONS BY CANDIDATE OR IMMEDIATE FAMILY</b>	
Total Contributions for this reporting period:	\$
Total Contributions, Campaign to Date:	\$

NOTE: The contributions by Candidate or Immediate Family should also be included in the Contributions Over \$100 and Contributions \$100 or Less figures below.

<b>CONTRIBUTIONS OVER \$100</b>	(1) Total Contributions for this reporting period:	\$ 1,000.00
	(2) Total Contributions, Campaign to Date:	\$ 1,000.00

NOTE: If you received contributions over \$100, you will also need to attach the Details of Contributions Over \$100 sheet(s).

<b>CONTRIBUTIONS \$100 OR LESS</b>	(3) Total Contributions for this reporting period:	\$ 1,250.00
	(4) Number of contributors for this reporting period:	24
	(5) Total Contributions, Campaign to Date:	\$ 1,250.00
	(6) Number of contributors, Campaign to Date:	24

**GRAND TOTAL OF ALL CONTRIBUTIONS**

<b>FOR THIS REPORTING PERIOD</b>	(7) Subtotal of non-monetary (in-kind) contributions:	\$ 2309
	(8) Subtotal of monetary contributions (Lines 1+3):	\$ 2,250.00
	(9) <b>TOTAL For This Reporting Period (Lines 7 + 8):</b>	\$ 4559
<b>CAMPAIGN TO DATE</b>	(10) Subtotal of non-monetary (in-kind) contributions:	\$ 2309
	(11) Subtotal of monetary contributions (Lines 2 + 5):	\$ 2,250.00
	(12) <b>TOTAL, Campaign to Date (Lines 10 + 11):</b>	\$ 4559

**EXPENDITURES**

<b>GRAND TOTAL OF ALL EXPENDITURES</b>	<b>TOTAL For This Reporting Period:</b>	\$ 3,699.05
	<b>TOTAL, Campaign to Date:</b>	\$ 3,699.05

NOTE: If you have made expenditures for this reporting period, you will need to attach the Details of Expenditures sheet(s)

**LOANS OR OTHER DEBT**

<b>TOTAL PRIVATE LOANS OR OTHER OBLIGATIONS CURRENTLY OUTSTANDING</b>	Total Loans For This Reporting Period:	\$ 1,259.06
	Total Loans, Campaign to Date:	\$ 1,259.06
<b>TOTAL DEBT/OBLIGATIONS FORGIVEN</b>	Total Loans For This Reporting Period:	\$
	Total Loans, Campaign to Date:	\$

NOTE: If you have loans or other debt outstanding or debt that has been forgiven, you will need to attach the Details of Loans/Other Obligations sheet(s).

Amended 2/28/13

CAMPAIGN FINANCE DISCLOSURE REPORT - DETAILS OF EXPENDITURES Page 3 of 6

Note: Expenditures occur on both a cash basis and an accrual basis; report whichever occurs first. You must report expenses when promised to be paid or when payment is disbursed, which ever occurs first. 17 V.S.A. §2801(3)

Date of Expenditure	Amount of Expenditure	To Whom Paid	Address	Town/City	State	Zip	Purpose of Expenditure
1/14/2013	\$15.76	Blueprints Etc.	20 Farrell St.	So. Burlington	VT	05403	City Maps
1/20/2013	\$14.88	Staples *	1375 Mapletree Place	Williston	VT	05495	Labels for mail
1/21/2013	\$125.00	Got Clicks	1146 Dugway Rd.	Richmond	VT	05477	Facebook Page Setup
1/25/2013	\$18.77	iParty	41 Hawthorne St.	Williston	VT	05495	Balloons/Weights
1/26/2013	\$5.00	Dunkin Donuts	University Mall	So. Burlington	VT	05403	Coffee/Donuts
1/31/2013	\$5.62	Staples *	1375 Mapletree Pl.	Williston	VT	05495	Envelopes
2/1/2013	\$25.00	Banners Unlimited *	339 Patchen Rd.	So. Burlington	VT	05403	Lawn Sign
2/1/2013	\$204.10	Paw Prints	12 Gregory Dr., Ste. 8	So. Burlington	VT	05403	Door Hanger Tags
2/2/2013	\$10.73	Dunkin Donuts	University Mall	So. Burlington	VT	05403	Coffee/Donuts
2/5/2013	\$157.50	Fast Color Printer	2390 26th North Ave.	St. Petersburg	FL	33713	Postcards
2/7/2013	\$46.00	US Postal Service *	82 Blair Park Rd.	Williston	VT	05495	Stamps
2/7/2013	\$322.50	Sign Depot *	1813 East Colonial Dr.	Orlando	FL	32803	Signs
2/9/2013	\$3.66	Dunkin Donuts	University Mall	So. Burlington	VT	05403	Coffee/Donuts
2/9/2013	\$3.02	Dunkin Donuts	University Mall	So. Burlington	VT	05403	Coffee/Donuts
2/13/2013	\$54.00	Heidi Danforth	8 Pioneer St.	Essex Junction	VT	05452	Cupcakes for Sr Visits
2/13/2013	\$198.00	US Postal Service	60 White St.	So. Burlington	VT	05403	Stamps
2/13/2013	\$155.00	US Postal Service	82 Blair Park Rd.	Williston	VT	05495	Stamps
2/13/2013	\$268.78	Paw Prints	12 Gregory Dr., Ste. 8	So. Burlington	VT	05403	Rack Cards
2/14/2013	\$71.00	The Other Paper *	1340 Williston Rd.	So. Burlington	VT	05403	Coffee Ad 1/24/2013 Invoice #4211
2/14/2013	\$330.00	The Other Paper	1340 Williston Rd.	So. Burlington	VT	05403	Ad 1/31/2013 Invoice #4225
2/14/2013	\$330.00	The Other Paper	1340 Williston Rd.	So. Burlington	VT	05403	Ad 2/14/2013 Invoice #4256
2/14/2013	\$96.00	The Other Paper *	1340 Williston Rd.	So. Burlington	VT	05403	Coffee Ad 2/14/2013 Invoice #4260
2/21/2013	\$18.40	US Postal Service	82 Blair Park Rd.	Williston	VT	05495	Stamps
2/21/2013	\$330.00	The Other Paper	1340 Williston Rd.	So. Burlington	VT	05403	Ad 2/28/2013 Invoice #N/A
2/22/2013	\$11.27	Dunkin Donuts	University Mall	So. Burlington	VT	05403	Coffee/Donuts
2/9/2013	\$6.68	Dunkin Donuts	University Mall	So. Burlington	VT	05403	Coffee/Donuts
2/11/2013	\$61.67	Uline	12575 Uline	Pleasant Prairie	WI	53158	Plastic door tag bags

Patricia A. Nowak

Name of candidate or PAC: \_\_\_\_\_

Amended 2/28/2013

Date of Expenditure	Amount Expenditure	To Whom Pd.	Address	Town/City	State	Zip	Purpose
02/19/2013	\$ 330.00	Other Paper	1340 Williston Rd	So Burlington	VT	05403	1/4 page ad
02/19/2013	\$ 180.00	Front Porch Forum	PO Box 64781	Burlington	VT	05403	shared ad
02/19/2013	\$ 280.00	Other Paper	1340 Williston Rd	So Burlington	VT	05403	shared ads
02/16/2013	\$ 20.71	Dunkin Donuts	University Mall	So Burlingtonj	VT	05403	coffee/Donuts

page 5 of 6



CAMPAIGN FINANCE DISCLOSURE FORM  
CERTIFICATION OF CANDIDATES FOR STATE OFFICE, GENERAL ASSEMBLY, COUNTY OFFICE  
AND LOCAL OFFICE

CANDIDATE NAME: Patricia A. Nowak

CAMPAIGN NAME: Pat Nowak for City Council

ADDRESS: 33 Blair Park Rd Ste 103 TOWN: Williston STATE: VT ZIP: 05495

TELEPHONE: 802 879 1553 PARTY AFFILIATION: N/A

OFFICE SOUGHT (CHECK ONE ONLY):  
STATE OFFICE: GOVERNOR LT. GOVERNOR TREASURER SECRETARY OF STATE AUDITOR  
ATTORNEY GENERAL  
GENERAL ASSEMBLY: STATE SENATE STATE REPRESENTATIVE

THIS MY REPORT DUE: 3-15-13 (Fill in date)

LOCAL OFFICE: City Council S Burlington THIS IS MY REPORT DUE: 10 days prior to election. Date filed: \_\_\_\_\_  
10 days after election. Date filed: 3-15-13

ALL CANDIDATES: This report amends one previously filed on: 3/15/13 (ONLY if changing a PREVIOUSLY FILED report.)

SURPLUS OR CARRYFORWARD FROM previous campaign: TOTAL surplus from \_\_\_\_\_: \$ \_\_\_\_\_  
TOTAL CARRYFORWARD to current campaign (surplus - donations + interest =): \$ \_\_\_\_\_

I HAVE COMPLETED AND ATTACHED THE FOLLOWING FORMS for this reporting period:  
 Certification of Candidate - This sheet (REQUIRED)  Contribution & Expenditure Summary (REQUIRED)  
 Details of Contributions Over \$100 (As needed)  Details of Expenditures (As needed)  
 Details of Debt/Obligation Outstanding or Discharged/Forgiven (As needed)

FINAL REPORT: This is my FINAL REPORT for the current Campaign Cycle and closes out my current campaign by indicating the disposition of any surplus or debt, and all contributions and expenditures for this cycle are accounted for. (Only check when filing final report.) Note: A FINAL REPORT is required to close out a campaign. This does NOT mean that your account must be closed.

CHECK ONE ONLY:  
   I have \$ \_\_\_\_\_ surplus from the current campaign and this amount will be carried forward to the new campaign.  
   Surplus funds from the current campaign in the amount of \$ \_\_\_\_\_ have been donated to the charity, candidate, PAC or political party listed in the attached Details of Expenditures sheet, leaving a balance of \$0.

I hereby certify that the information provided on all pages of this campaign finance disclosure report is true to the best of my knowledge, information and belief.

Date \_\_\_\_\_ Candidate OR Treasurer Signature \_\_\_\_\_ Name of person signing form (PRINT) \_\_\_\_\_

Office of the Vermont Secretary of State  
Elections Division  
128 State Street  
Montpelier, VT 05633-1101  
(802) 828-2363



**Name of candidate:** Patricia Nowak

**CONTRIBUTION and EXPENDITURE SUMMARY**

**CONTRIBUTIONS**

<b>CONTRIBUTIONS BY CANDIDATE OR IMMEDIATE FAMILY</b>	
Total Contributions for this reporting period:	\$
Total Contributions, Campaign to Date:	\$

NOTE: The contributions by Candidate or Immediate Family should also be included in the Contributions Over \$100 and Contributions \$100 or Less figures below.

<b>CONTRIBUTIONS OVER \$100</b>	(1) Total Contributions for this reporting period:	\$ 200.00
	(2) Total Contributions, Campaign to Date:	\$ 1,200.00

NOTE: If you received contributions over \$100, you will also need to attach the Details of Contributions Over \$100 sheet(s).

<b>CONTRIBUTIONS \$100 OR LESS</b>	(3) Total Contributions for this reporting period:	\$ 50.00
	(4) Number of contributors for this reporting period:	1
	(5) Total Contributions, Campaign to Date:	\$ 1,300.00
	(6) Number of contributors, Campaign to Date:	25

**GRAND TOTAL OF ALL CONTRIBUTIONS**

<b>FOR THIS REPORTING PERIOD</b>	(7) Subtotal of non-monetary (in-kind) contributions:	\$ 2602
	(8) Subtotal of monetary contributions (Lines 1+ 3):	\$ 250.00
	<b>(9) TOTAL For This Reporting Period (Lines 7 + 8):</b>	<b>\$ 2852</b>
<b>CAMPAIGN TO DATE</b>	(10) Subtotal of non-monetary (in-kind) contributions:	\$ 4911
	(11) Subtotal of monetary contributions (Lines 2 + 5):	\$ 2,500.00
	<b>(12) TOTAL, Campaign to Date (Lines 10 + 11):</b>	<b>\$ 7411</b>

**EXPENDITURES**

<b>GRAND TOTAL OF ALL EXPENDITURES</b>	<b>TOTAL For This Reporting Period:</b>	\$ 1,336.38
	<b>TOTAL, Campaign to Date:</b>	\$ 5,035.43

NOTE: If you have made expenditures for this reporting period, you will need to attach the Details of Expenditures sheet(s)

**LOANS OR OTHER DEBT**

<b>TOTAL PRIVATE LOANS OR OTHER OBLIGATIONS CURRENTLY OUTSTANDING</b>	Total Loans For This Reporting Period:	\$ 1,336.38
	Total Loans, Campaign to Date:	\$ 2,595.44
<b>TOTAL DEBT/OBLIGATIONS FORGIVEN</b>	Total Loans For This Reporting Period:	\$ 0
	Total Loans, Campaign to Date:	\$ 0

NOTE: If you have loans or other debt outstanding or debt that has been forgiven, you will need to attach the Details of Loans/Other Obligations sheet(s).









CAMPAIGN FINANCE DISCLOSURE FORM

CERTIFICATION OF CANDIDATES FOR STATE OFFICE, GENERAL ASSEMBLY, COUNTY OFFICE AND LOCAL OFFICE

CANDIDATE NAME: Patricia A. Nowak

CAMPAIGN NAME: Pat Nowak for City Council

ADDRESS: 33 Blair Park Rd Ste 103 TOWN: Williston STATE: VT ZIP: 05495

TELEPHONE: (802) 879-1533 PARTY AFFILIATION: N/A

OFFICE SOUGHT (CHECK ONE ONLY):

STATE OFFICE: GOVERNOR LT. GOVERNOR TREASURER SECRETARY OF STATE AUDITOR ATTORNEY GENERAL GENERAL ASSEMBLY: STATE SENATE STATE REPRESENTATIVE

THIS MY REPORT DUE: (Fill in date)

LOCAL OFFICE: THIS IS MY REPORT DUE: 10 days prior to election. Date filed: 10 days after election. Date filed:

ALL CANDIDATES: This report amends one previously filed on: 4/26/13 (ONLY if changing a PREVIOUSLY FILED report.)

SURPLUS OR CARRYFORWARD FROM previous campaign: TOTAL surplus from \$ TOTAL CARRYFORWARD to current campaign (surplus - donations + interest =): \$

I HAVE COMPLETED AND ATTACHED THE FOLLOWING FORMS for this reporting period:

- Certification of Candidate - This sheet (REQUIRED) Contribution & Expenditure Summary (REQUIRED) Details of Contributions Over \$100 (As needed) Details of Expenditures (As needed) Details of Debt/Obligation Outstanding or Discharged/Forgiven (As needed)

FINAL REPORT: This is my FINAL REPORT for the current Campaign Cycle and closes out my current campaign by indicating the disposition of any surplus or debt, and all contributions and expenditures for this cycle are accounted for. (Only check when filing final report.) Note: A FINAL REPORT is required to close out a campaign. This does NOT mean that your account must be closed.

CHECK ONE ONLY:

I have \$ surplus from the current campaign and this amount will be carried forward to the new campaign. Surplus funds from the current campaign in the amount of \$ have been donated to the charity, candidate, PAC or political party listed in the attached Details of Expenditures sheet, leaving a balance of \$0.

I hereby certify that the information provided on all pages of this campaign finance disclosure report is true to the best of my knowledge, information and belief.

Date

Candidate OR Treasurer Signature

Name of person signing form (PRINT)

Office of the Vermont Secretary of State Elections Division 128 State Street Montpelier, VT 05633-1101 (802) 828-2363

Name of candidate: Patricia Nowak

**CONTRIBUTION and EXPENDITURE SUMMARY**

**CONTRIBUTIONS**

**CONTRIBUTIONS BY CANDIDATE OR IMMEDIATE FAMILY**

Total Contributions for this reporting period:	\$
Total Contributions, Campaign to Date:	\$

NOTE: The contributions by Candidate or Immediate Family should also be included in the Contributions Over \$100 and Contributions \$100 or Less figures below.

<b>CONTRIBUTIONS OVER \$100</b>	(1) Total Contributions for this reporting period:	\$ 0
	(2) Total Contributions, Campaign to Date:	\$ 1,200.00

NOTE: If you received contributions over \$100, you will also need to attach the Details of Contributions Over \$100 sheet(s).

<b>CONTRIBUTIONS \$100 OR LESS</b>	(3) Total Contributions for this reporting period:	\$ 0
	(4) Number of contributors for this reporting period:	0
	(5) Total Contributions, Campaign to Date:	\$ 1,300.00
	(6) Number of contributors, Campaign to Date:	25

**GRAND TOTAL OF ALL CONTRIBUTIONS**

<b>FOR THIS REPORTING PERIOD</b>	(7) Subtotal of non-monetary (in-kind) contributions:	\$ 0
	(8) Subtotal of monetary contributions (Lines 1+3):	\$ 0
	(9) <b>TOTAL For This Reporting Period (Lines 7 + 8):</b>	\$ 0
<b>CAMPAIGN TO DATE</b>	(10) Subtotal of non-monetary (in-kind) contributions:	\$ 4911
	(11) Subtotal of monetary contributions (Lines 2 + 5):	\$ 2,500.00
	(12) <b>TOTAL, Campaign to Date (Lines 10 + 11):</b>	\$ 7411

**EXPENDITURES**

<b>GRAND TOTAL OF ALL EXPENDITURES</b>	<b>TOTAL For This Reporting Period:</b>	\$ . 8.00
	<b>TOTAL, Campaign to Date:</b>	\$ 5,043.43

NOTE: If you have made expenditures for this reporting period, you will need to attach the Details of Expenditures sheet(s)

**LOANS OR OTHER DEBT**

<b>TOTAL PRIVATE LOANS OR OTHER OBLIGATIONS CURRENTLY OUTSTANDING</b>	Total Loans For This Reporting Period:	\$ 0
	Total Loans, Campaign to Date:	\$ 2,595.44
<b>TOTAL DEBT/OBLIGATIONS FORGIVEN</b>	Total Loans For This Reporting Period:	\$ 0
	Total Loans, Campaign to Date:	\$ 1,659.91

NOTE: If you have loans or other debt outstanding or debt that has been forgiven, you will need to attach the Details of Loans/Other Obligations sheet(s).









## SETTLEMENT AGREEMENT

The State of Vermont (the “State”) and South Burlington Good Gov Org., Inc. together with its officers and directors named in the signatures to this Settlement Agreement (collectively “SBGG”), hereby agree to resolve the campaign finance complaint as follows:

WHEREAS, the Vermont Attorney General’s Office received a complaint on August 26, 2013, concerning possible campaign finance law violations by SBGG involving advertising for candidates for election to the South Burlington city council in March 2013;

WHEREAS, SBGG did not intend to become a Vermont political committee;  
and

WHEREAS, the State and SBGG agree that the following facts are true and accurate:

1. SBGG is a Vermont non-profit corporation, operating in South Burlington, Vermont. Its Articles of Incorporation state that it was organized for the purpose of “engaging in all lawful activities related to: (i) the education of citizens, taxpayers and residents of South Burlington about the good government practices and procedures; (ii) publicizing information about South Burlington and the operation of its government; and, (iii) increasing civic engagement by South Burlington citizens by encouraging participation in local government

as candidates for office, as voters, and as informed citizens.” SBGG was formally organized as a corporation on November 14, 2012.

2. Individuals interested in supporting the activities of SBGG contributed funds to the organization.
3. Pat Nowak and Chris Shaw were candidates for South Burlington City Council on March 5, 2013.
4. A full-page advertisement ran in The Other Paper, a weekly South Burlington newspaper, on February 7, 2013, in support of candidates Pat Nowak and Chris Shaw. The advertisement stated it was “Paid for by South Burlington Good Government.” No address was listed for the organization in the advertisement.
5. This advertisement was an electioneering communication and was required, by 17 V.S.A. § 2892, to contain the name and address of the person or political committee that paid for it.
6. The cost of the advertisement was \$1,090. It was paid for by a check written on SBGG’s bank account and signed by an officer of SBGG.
7. The person who placed the advertisement mistakenly told The Other Paper to list SBGG as the sponsor of the advertisement.
8. SBGG intended to be reimbursed for the cost of the February 7, 2013, advertisement in The Other Paper by individuals who had intended to be responsible for the advertisement. However, those individuals had not reimbursed SBGG for the cost of the advertisement prior to the

Attorney General's Office informing SBGG that it had received a complaint in this matter.

9. SBGG met the definition of a "political committee" in 17 V.S.A. § 2801(4) by accepting contributions and making expenditures of \$500 or more in support of candidates for election.
10. SBGG did not register with the Secretary of State as a political committee, and therefore violated 17 V.S.A. § 2831.
11. SBGG did not file any campaign finance reports as a political committee for the 2013 South Burlington election, and therefore violated 17 V.S.A. § 2831.

WHEREFORE, the State and SBGG agree to settle this matter by taking the following actions:

A. The State covenants and agrees not to sue, or file a complaint or other charge (either civil or criminal) or seek any other legal or administrative enforcement action against, SBGG or its officers and directors related to advertising for candidates in the March 2013 City of South Burlington election.

B. The directors of SBGG agree to pay \$500 to the State as a civil penalty within thirty (30) days of the signing of this Stipulated Settlement;

C. SBGG agrees to file a campaign finance report, in the form attached to this Agreement marked "Exhibit to Settlement Agreement with State of Vermont", with the Secretary of State's Office covering the March 2013 City of South Burlington election within 21 days of signing this Settlement Agreement.

Dated in Montpelier, Vermont this 27 day of April 2015.

STATE OF VERMONT

WILLIAM H. SORRELL  
ATTORNEY GENERAL

By: *Eve Jacobs-Carnahan*  
Eve Jacobs-Carnahan  
Assistant Attorney General  
Office of the Attorney General  
109 State Street  
Montpelier, VT 05609-1001  
(802) 828-3176

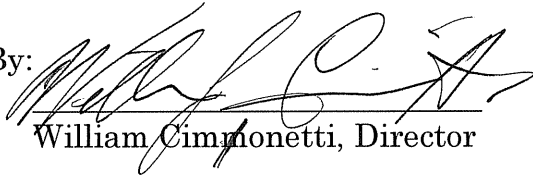
Dated in South Burlington, Vermont this 23 day of April 2015.


SOUTH BURLINGTON GOOD GOV ORG., INC.

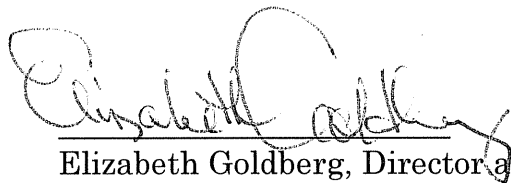
14 Hopkins St.

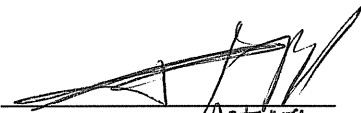
South Burlington, VT 05403

By:

  
William Cimmonetti, Director

  
Michael Simoneau, Director and  
President

  
Elizabeth Goldberg, Director and V.P.

  
James Knapp, <sup>Acting</sup> Secretary and  
Treasurer

CAMPAIGN FINANCE DISCLOSURE FORM  
CERTIFICATION FOR POLITICAL ACTION COMMITTEES (PACs) OR POLITICAL PARTIES

NAME OF COMMITTEE/PARTY: SOUTH BURLINGTON GOOD GOV ORG., INC.

CONTACT PERSON: JAMES KNAPP

ADDRESS: 14 HOPKINS ST TOWN: SO BURLINGTON STATE: VT ZIP: 05403

TELEPHONE: (802) 363-2476

THIS THE REPORT DUE: 2/25/13 (Fill in date.)

We have made contributions to affect a local (municipal) election held in: SOUTH BURLINGTON, VT

The election was/will be held on: 3/5/13 (Date of election) THIS IS OUR REPORT DUE:  30 days prior to election.  10 days prior election  14 days after election

NO ACTIVITY TO REPORT- There has been no activity in the campaign account since the previously filed report.

ALL PACs/PARTIES: This report amends one previously filed on: \_\_\_\_\_ (ONLY if changing a PREVIOUSLY FILED report.)

SURPLUS FROM previous campaign TOTAL surplus from 20\_\_ : \$ \_\_\_\_\_  
TOTAL CARRYFORWARD to current campaign (surplus - donations + interest): \$ \_\_\_\_\_

(NOTE: Complete this section ONLY for first report of new campaign cycle if carrying forward surplus funds from a prior campaign )

WE HAVE COMPLETED AND ATTACHED THE FOLLOWING FORMS for this reporting period:

- Certification of PAC or party - This sheet (REQUIRED)
- Contribution & Expenditure Summary (As needed)
- Details of Contributions Over \$100 (As needed)
- Details of Expenditures (As needed)

FINAL REPORT: This is our FINAL REPORT for the current Campaign Cycle and closes out our current campaign by indicating the disposition of any surplus or debt, and all contributions and expenditures for this cycle are accounted for. (Only check when filing final report.) Note: A FINAL REPORT is required to close out a campaign. This does NOT mean that your account must be closed.

CHECK ONE ONLY:

- We have \$ 0 surplus from the current campaign and this amount will be carried forward to the new campaign.
- Surplus funds from the current campaign in the amount of \$ \_\_\_\_\_ have been donated to the charity, candidate, PAC or political party listed in the attached Details of Expenditures sheet, leaving a balance of \$0.

I hereby certify, under the pains and penalties of perjury, that the information provided on all pages of this campaign finance disclosure report is true and accurate to the best of my knowledge, information and belief.

By checking this box, no signature is needed and you agree to the terms and conditions above under Vermont law.

4/24/15  
Date

[Signature]  
Acting Treasurer Signature

JAMES E. KNAPP  
Name of person signing form (PRINT)

\*\*A PDF of this report can be sent to campaignfinance@sec.state.vt.us and must be received by 5 PM on the reporting deadline.\*\*

Exhibit to Settlement Agreement with State of Vermont

Name of PAC/Party:

**CONTRIBUTION and EXPENDITURE SUMMARY**

**CONTRIBUTIONS**

<b>CONTRIBUTIONS OVER \$100</b>	(1) Total Contributions – this reporting period:	\$ 1000.00
	(2) Total Contributions – Campaign to Date:	\$ 1000.00

NOTE: If you received contributions over \$100, you must attach the Details of Contributions Over \$100 sheet(s).

<b>CONTRIBUTIONS \$100 OR LESS</b>	(3) Total Contributions – this reporting period:	\$ 90.00
	(4) Number of contributors – this reporting period:	3
	(5) Total Contributions – Campaign to Date:	\$ 90.00
	(6) Number of contributors – Campaign to Date:	

**GRAND TOTAL OF ALL CONTRIBUTIONS**

<b>FOR THIS REPORTING PERIOD</b>	(7) Subtotal of non-monetary (in-kind) contributions:	\$ 90.00
	(8) Subtotal of monetary contributions (Lines 1 + 3 – 7):	\$ 1000.00
	(9) TOTAL – This Reporting Period (Lines 7 + 8):	\$ 1090.00
<b>CAMPAIGN TO DATE</b>	(10) Subtotal of non-monetary (in-kind) contributions:	\$ 90.00
	(11) Subtotal of monetary contributions (Lines 2 + 5 – 10):	\$ 1000.00
	(12) TOTAL – Campaign to Date (Lines 10 + 11):	\$ 1090.00

**EXPENDITURES**

<b>GRAND TOTAL OF ALL EXPENDITURES</b>	TOTAL – This Reporting Period:	\$ 1090.00
	TOTAL – Campaign to Date:	\$ 1090.00

NOTE: If you have made expenditures for this reporting period, you will need to attach the Details of Expenditures sheet(s)

**LOANS OR OTHER DEBT**

<b>TOTAL PRIVATE LOANS OR OTHER OBLIGATIONS CURRENTLY OUTSTANDING</b>	Total Loans – This Reporting Period:	\$ -0-
	Total Loans – Campaign to Date:	\$ -0-
<b>TOTAL DEBT/OBLIGATIONS FORGIVEN</b>	Total Loans – This Reporting Period:	\$ -0-
	Total Loans – Campaign to Date:	\$ -0-

NOTE: If you have loans or other debt outstanding or debt that has been forgiven, you will need to attach the Details of Loans/Other Obligations sheet(s).

Exhibit to Settlement Agreement with State of Vermont







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SETTLEMENT AGREEMENT

The State of Vermont (the "State") and the Vermont House Republican PAC hereby agree to resolve the March 23, 2016, campaign finance complaint as follows:

WHEREAS, on March 23, 2016, a complaint was filed with the Vermont Attorney General's Office alleging that the Vermont House Republican PAC had violated campaign finance laws;

WHEREAS, the State and Vermont House Republican PAC ("VHR PAC") agree that the following facts are true and accurate:

1. In January 2014, the Legislature passed a law creating a new category of political committees in Vermont called legislative leadership political committees. It defined them in 17 V.S.A. § 2901(19) as "a political committee established by or on behalf of a political party caucus within a chamber of the General Assembly." The new law required existing legislative leadership political committees to register as such by July 15, 2015.
2. From at least February 2013 onward, members of the House Republican caucus, including the caucus leadership, have been involved in the activities of VHR PAC, including making decisions regarding the content of mailings, filing campaign finance reports, and making decisions regarding the spending of VHR PAC funds.
3. Based on the above facts, VHR PAC is a legislative leadership political committee as defined by 17 V.S.A. § 2901(19). As such, VHR PAC was required to register pursuant to 17 V.S.A. § 2922(a)(2). VHR PAC violated this provision by failing to register as a legislative leadership political committee.

4. In July and October 2015, two lobbyists contacted VHR PAC to indicate that businesses employing them wished to send contributions to the political committee. Before doing so, the lobbyists wanted to confirm that VHR PAC was not a legislative leadership political committee. A representative of VHR PAC responded by indicating that it was not a legislative leadership political committee.
5. In November and December 2015, the two lobbyist employers connected to the lobbyists who had made the earlier contacts sent contributions to VHR PAC.
6. Legislative leadership political committees are prohibited from soliciting contributions from lobbyist employers, pursuant to 2 V.S.A. § 266(a)(3). VHR PAC violated this provision by soliciting and accepting two contributions from lobbyist employers in late 2015.
7. VHR PAC has now registered with the Secretary of State as a legislative leadership PAC.

WHEREFORE, the State and VHR PAC agree to settle this matter by taking the following actions:

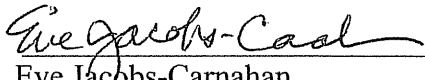
- A. The State covenants and agrees not to sue, or file a complaint or other charge (either civil or criminal) or seek any other legal or administrative enforcement action against, VHR PAC for the activities described above.
- B. VHR PAC agrees to return the two contributions mentioned above to the lobbyist employers who had made the contributions, not later than September 30, 2016, and certify to the State that it has done so.

- C. VHR PAC agrees to pay \$2,000 to the State as a civil penalty within thirty (30) days of the signing of this Stipulated Settlement.
- D. VHR PAC agrees to terminate its campaign activities and file a final report with the Secretary of State's Office pursuant to 17 V.S.A. § 2965 within thirty (30) days of the signing of this Stipulated Settlement. In the event it chooses not to terminate its activities, VHR PAC agrees to maintain its registration as a legislative leadership political committee pursuant to 17 V.S.A. § 2922(a)(2).

Dated in Montpelier, Vermont this 19th day of September 2016.

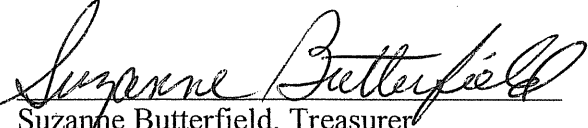
STATE OF VERMONT

WILLIAM H. SORRELL  
ATTORNEY GENERAL

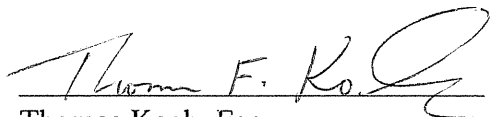
By:   
Eve Jacobs-Carnahan  
Assistant Attorney General  
Office of the Attorney General  
109 State Street  
Montpelier, VT 05609-1001

Dated in Gaysville, Vermont this 20<sup>th</sup> day of September 2016.

VERMONT HOUSE REPUBLICAN PAC

By:   
Suzanne Butterfield, Treasurer  
Gaysville, Vermont

Approved as to form:



Thomas Koch, Esq.  
326 Lowery Rd.  
Barre, VT 05641  
Attorney for Vermont House Republican PAC

## SETTLEMENT AGREEMENT

By and through their undersigned counsel, the State of Vermont (the “State”) and the Democratic Attorneys General Association PAC (“DAGA PAC”) hereby agree to resolve the June 3, 2015, campaign finance complaint as follows:

WHEREAS, on June 3, 2015, a complaint was filed with the Vermont Attorney General’s Office alleging that DAGA PAC had violated campaign finance laws in 2012;

WHEREAS, on June 26, 2015, the Attorney General’s Office notified DAGA PAC that it had received a complaint about its 2012 campaign finance reports;

WHEREAS, on July 10, 2015, DAGA PAC amended and filed its 2012 reports correcting the errors;

WHEREAS, the State and DAGA PAC agree that the following facts are true and accurate:

1. DAGA PAC is a Vermont political action committee that received contributions and made expenditures in support of a political party and a candidate for the office of Vermont Attorney General during the 2011-2012 general election cycle.
2. In 2012, under Vermont law, registered political committees were required by 17 V.S.A. § 2811 to file periodic campaign finance reports with the Vermont Secretary of State.
3. On July 16, 2012, DAGA PAC filed a campaign finance report with the Secretary of State showing that it had made \$6000 in expenditures during the reporting period and the campaign to date. The report stated that DAGA PAC had not carried over any surplus funds from the previous campaign and had received \$0 in contributions during the reporting period and the campaign to date. The report included the attachment showing the Details of Expenditures, but did not include the attachment listing Details of Contributions over \$100.

4. DAGA PAC filed campaign finance reports with the Secretary of State on August 15, 2012 and September 17, 2012. The reports showed that DAGA PAC had made \$6000 in expenditures during the campaign to date. The reports also stated that the PAC had no surplus funds from prior campaigns and had received \$0 in contributions during the reporting period and the campaign to date.

5. DAGA PAC did not file a campaign finance report with the Secretary of State in October 2012. DAGA PAC's October 2012 report should have included an additional \$2,000 in expenditures it made as a contribution to a political party and \$2,000 in contributions it received.

6. DAGA PAC filed campaign finance reports with the Secretary of State on November 15, 2012 and December 15, 2012. The reports showed that DAGA PAC had made \$8000 in expenditures during the campaign to date. The reports also stated the PAC had received \$2000 in contributions over \$100 during the reporting period and the campaign to date. However, the reports did not include the Details of Contributions over \$100 page showing the sources of those contributions.

7. The reports filed by DAGA PAC omitted key disclosures, including the details of its expenditures and the details of its contributions over \$100. The reports filed by DAGA PAC also contained inaccurate information, including the statements that the PAC had received only \$2000 in contributions for the entire campaign. As a result, DAGA PAC failed to disclose the full amount of the contributions it received in the 2012 campaign and it did not disclose the source of any of those contributions.

8. DAGA PAC had an obligation under 17 V.S.A. § 2811 to file accurate and timely campaign finance reports. Its failure to do so was a violation of this provision of Vermont's campaign finance law.

9. On June 26, 2015, the Attorney General's Office notified DAGA PAC that it had received a complaint about its activities and reports. On July 10, 2015, DAGA PAC filed amended versions of its campaign finance reports for July, August, September, November and December 2012, as well as the missing report for October 2012.

WHEREFORE, the State and DAGA PAC agree to settle this matter by taking the following actions:

A. The State covenants and agrees not to sue, or file a complaint or other charge (either civil or criminal) or seek any other legal or administrative enforcement against, DAGA PAC, its employees, or agents for violations of Vermont's campaign finance statutes based on any activity conducted by or on behalf of DAGA PAC in the 2011-2012 general election cycle.

B. DAGA PAC agrees to pay \$8,750 to the State as a civil penalty within thirty (30) days of the signing of this Stipulated Settlement.

Dated in Montpelier, Vermont this 20<sup>th</sup> day of December 2016.

STATE OF VERMONT

WILLIAM H. SORRELL  
ATTORNEY GENERAL

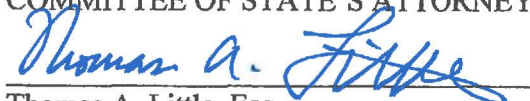
By:



Megan J. Shafritz  
Assistant Attorney General  
Office of the Attorney General  
109 State Street  
Montpelier, VT 05609-1001  
(802) 828-5527

COMMITTEE OF STATE'S ATTORNEYS

By:



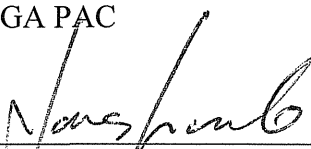
Thomas A. Little, Esq.  
Special Counsel (17 V.S.A. § 2904)  
P.O. Box 907  
Burlington, VT 05402-0907



Dated in Washington, D.C. this 12<sup>th</sup> day of December 2016.

DAGA PAC

By:

  
\_\_\_\_\_  
James C. Lamb, Esq.  
Sandler Reiff  
1025 Vermont Avenue NW, Suite 300  
Washington, DC 20005

STATE OF VERMONT

SUPERIOR COURT  
Washington Unit

CIVIL DIVISION  
Docket No. 187-3-15 Wncv

STATE OF VERMONT, )  
Plaintiff, )  
 )  
 v. )  
 )  
 DEAN R. CORREN, )  
Defendant. )

SETTLEMENT AGREEMENT

By and through their undersigned counsel, the State of Vermont (the "State") and Dean R. Corren ("Corren") hereby agree to resolve the campaign finance matter that is the subject of this action by entering into this Agreement as follows:

WHEREAS, the State filed this enforcement action against Corren alleging violations of Vermont's public financing option for election campaigns;

WHEREAS, the Court issued a Decision on Cross-Motions for Summary Judgment on July 3, 2017, in this action which held that the mass email was a contribution and did not qualify for an exemption, but left other matters open for trial;

WHEREAS, the parties now enter into this agreement for their mutual convenience in recognition of the costs and risks associated with litigation;

WHEREAS, the parties agree that this agreement is supported by good and binding consideration in the form of the promises and obligations set forth below;

WHEREAS, the State and Corren agree that the following facts are true and accurate:

1. Corren was a candidate for lieutenant governor in 2014, qualified for public financing and received \$180,717 in public finance grants.

2. Corren, his campaign manager, and his key campaign adviser made several requests to the Vermont Democratic Party (“VDP”) for assistance with Corren’s campaign, including on October 13, 2014 sending the VDP the text of an email which might be edited and sent to the VDP’s email list.

3. On October 24, 2014, the VDP at the request of the Corren campaign sent an edited version of the October 13 email message expressing support for Corren to more than 16,100 people on the VDP mailing list (the “mass email”).

4. The parties have since stipulated that the value of the mass email was \$255.

5. On July 3, 2017, the Vermont Superior Court ruled that the mass email was a contribution under the Vermont campaign finance law and was not excluded from the law’s definition of “contribution”.

6. Vermont law states that publicly financed candidates shall “not solicit, accept, or expend any contributions other than qualifying contributions, Vermont campaign finance grants and contributions authorized under 17 V.S.A. § 2985.”

7. Corren’s position in the litigation was that even if this mass email was not excluded from the definition of a contribution, he did not accept a “contribution” because his campaign offered, before the mass email was sent out on October 24, 2014, to pay for it if it did not qualify for an exclusion. Furthermore, after receiving notice on October 30, 2014, that the Attorney General’s Office had received a

complaint and the email blast might not be exempt, his campaign offered to pay for it.

8. The State's position in the litigation was that the mass email constituted a contribution because the VDP never agreed to accept payment from Corren for the email, and he had no reasonable expectation that he could pay the VDP for it.

9. This matter is scheduled for trial on December 7-8, 2017, before the Civil Division of the Vermont Superior Court in Washington County.

WHEREFORE, the State and Corren agree to settle this matter by taking the following actions:

A. Corren will pay \$255 to Green Up Vermont, Vermont Children's Trust Fund, Vermont Nongame Wildlife Fund, or Vermont Veterans Fund within 10 days of the signing of this Agreement.

B. The parties will stipulate to the dismissal of this action pursuant to V.R.C.P. 41(a)(1).

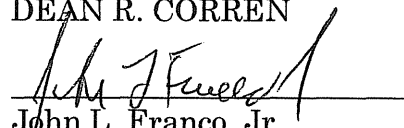
FURTHER, Corren, on behalf of himself, his heirs, executors, successors, assigns, campaign staff, advisers, and agents, agrees to release and forever discharge the State, its departments, agencies, and all present and former employees, officers, agents and representatives, from any and all claims and causes of actions that relate in any manner to his 2014 campaign for lieutenant governor, his 2014 participation in Vermont's public financing option, the State's enforcement of campaign finance statutes related to the 2014 campaign, and the resolution of this enforcement action; *provided* however that, except as specifically set forth below, Corren does not waive or release his right to continue litigating the appeal currently pending in *Dean Corren*

*et al. v. James C. Condos et al.*, United States Court of Appeals for the Second Circuit  
No. 17-1343-cv; and

FURTHER, Corren agrees that he will not offer this Agreement, the fact of this Agreement, or the dismissal of this action as evidence or argument in any pending or future action whatsoever, in any forum, including but not limited to the federal action currently pending in the Court of Appeals for the Second Circuit, titled *Dean Corren, et al. v. James C. Condos, et al.*, No. 17-1343-cv.

Dated at Burlington, Vermont, this 17 day of November 2017.

DEAN R. CORREN



John L. Franco, Jr.

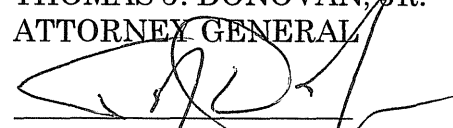
Law Offices of John L. Franco, Jr.  
110 Main St.  
Burlington, VT 05401  
(802) 864-7207  
johnfrancolaw@aol.com  
*Counsel for Dean R. Corren*

Dated at Montpelier, Vermont, this 20<sup>th</sup> day of November 2017.

STATE OF VERMONT

THOMAS J. DONOVAN, JR.  
ATTORNEY GENERAL

By:



Megan J. Shafritz  
Eve Jacobs-Carnahan  
Assistant Attorneys General  
Office of the Attorney General  
109 State Street  
Montpelier, VT 05609-1001  
(802) 828-3176  
megan.shafritz@vermont.gov  
eve.jacobs-carnahan@vermont.gov  
*Counsel for the State of Vermont*

VT SUPERIOR COURT  
WASHINGTON UNIT  
STATE OF VERMONT

SUPERIOR COURT  
Washington Unit

2013 APR 12 A 10:50 CIVIL DIVISION  
*Proposed Order* Docket No. 762-12-11 Wncv

STATE OF VERMONT,  
Plaintiff  
  
v.  
  
REPUBLICAN GOVERNORS  
ASSOCIATION and BRIAN DUBIE,  
Defendants

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2013 APR 19 A 9:56  
FILED  
ORDER  
VT SUPERIOR COURT  
WASHINGTON UNIT  
CIVIL DIVISION

STIPULATED JUDGMENT ORDER

By and through their undersigned counsel, Plaintiff State of Vermont (the "State"), Defendant Republican Governors Association (the "RGA"), and Defendant Brian Dubie ("Dubie"), hereby stipulate and agree that the Court enter the following Judgment Order in the above-captioned matter:

WHEREAS, the State filed this action against the RGA and Dubie alleging violations of Vermont's campaign finance laws and now agrees to forego appeal of the Court's dismissal of Count I of the Complaint in this action (the "Complaint"); and

WHEREAS, the Court has previously found that Dubie is responsible for the actions of his campaign staff in their efforts to secure his election to the office of Governor of the State of Vermont, that the obligation to follow the law rests with the candidate, and that, if the required actions are not taken, it is the candidate who actually violates the law, even if the candidate was not involved in or aware of a possible violation; and

WHEREAS, at all times material hereto, the RGA attempted in good faith to comply with Vermont's campaign finance laws and now wishes to resolve this matter without further litigation; and

WHEREAS, at all times material hereto, Dubie and the staff of his campaign committee attempted in good faith to comply with Vermont's campaign finance laws and Dubie now wishes to resolve this matter without further litigation; and

WHEREAS, the State, the RGA, and Dubie, agree that the following facts are true and accurate:

1. Defendant Brian Dubie was a Republican candidate for Governor of the State of Vermont in the 2010 general election (the "Election"). The members of Dubie's gubernatorial campaign staff and their agents are collectively referred to herein as the "Dubie Campaign."

2. The Dubie Campaign conducted confidential polls on July 13-14, September 20-21, and on a daily basis from October 10 to 31, 2010.

3. The RGA solicited the results of this confidential polling from the Dubie Campaign for the purpose of gleaning information the RGA could use as one of the factors in its determination of the content, timing, frequency, audience, and/or media outlets for its radio and television advertisements relating to the Election identified in the Complaint (the "Advertisements").

4. In response to the RGA's request, the Dubie Campaign gave the RGA the results of this polling and knew, or should have known and failed to ascertain, that the RGA might use the polling results as one of the factors in determining the content, timing, frequency, audience, and/or media outlets for the Advertisements.

5. The value of the Advertisements was in excess of \$6,000.00.

6. The Court may find that the Advertisements were “related expenditures” pursuant to 17 V.S.A. § 2809 and, accordingly, that the RGA made contributions to the Dubie Campaign that exceeded the \$6,000 contribution limit established by 17 V.S.A. § 2805(b), as amended by 1987 Vt. Acts & Resolves 263, § 3 (Adj. Sess.).

7. The Court may find that the Advertisements were “related expenditures” pursuant to 17 V.S.A. § 2809 and, accordingly, that the Dubie Campaign, acting on behalf of Dubie, accepted contributions from the RGA that exceeded the \$6,000 contribution limit established by 17 V.S.A. § 2805(b), as amended by 1987 Vt. Acts & Resolves 263, § 3 (Adj. Sess.).

8. The RGA did not file any campaign finance reports with the Vermont Secretary of State’s office pursuant to 17 V.S.A. §§ 2803 and 2811 reporting receipt of a contribution of polling data from the Dubie Campaign. The RGA reported the receipt of the polling data as contributions on its publicly available Form 8872, which it filed with the Internal Revenue Service.

9. The Dubie Campaign, acting on behalf of Dubie, did not report the receipt of the in-kind contributions of the Advertisements on his campaign finance reports filed with the Secretary of State’s office relating to the Election pursuant to 17 V.S.A. §§ 2803 and 2811.

WHEREFORE, as agreed by the State, the RGA, and Dubie, the Court hereby orders that judgment in this action shall be entered as follows:

A. Any claim against the RGA and Dubie set forth in Count I of the Complaint is hereby dismissed with prejudice;



B. The Court hereby enters judgment in favor of the State against the RGA with respect to the claims set forth in Counts II through V of the Complaint for violations of 17 V.S.A. §§ 2803, 2811, and 2805(b), as enacted by 1997 Vt. Acts & Resolves 64;

C. The Court hereby enters judgment in favor of the State against Dubie with respect to the claims set forth in Counts II through V of the Complaint for violations of 17 V.S.A. §§ 2803, 2811, and 2805(b), as amended by 1987 Vt. Acts & Resolves 263, § 3 (Adj. Sess.);

D. The Court hereby assesses a civil penalty against the RGA to be paid to the State within 30 days of the entry of this Stipulated Judgment Order in the amount of \$30,000 with respect to the claims set forth in Counts II through V of the Complaint;

E. The Court hereby assesses a civil penalty against Dubie to be paid to the State within 30 days of the entry of this Stipulated Judgment Order in the amount of \$10,000 with respect to the claims set forth in Counts II through V of the Complaint;

F. Dubie shall make a contribution of \$10,000 to the Vermont Food Bank within 30 days of the entry of this Stipulated Judgment Order;

G. The RGA and Dubie accept that the State's position going forward is that a candidate who gives private, contemporaneous polling data to a political committee facilitates related expenditures by the political committee within the meaning of 17 V.S.A. § 2809 if that political committee uses the polling data to materially influence the content, audience, timing, frequency, duration, or media outlet of candidate advertising;


H. The RGA shall work with the State in good faith to ascertain the information that should be provided on reports to be filed with the Vermont Secretary of State for its Election activity, and shall file the same within 30 days of the entry of this Stipulated Judgment Order;

I. Dubie shall file corrected campaign finance reports with the Secretary of State's office showing the receipt of the Advertisements and file the reports within 30 days of the entry of this Stipulated Judgment Order; and

J. Nothing in this Order shall preclude the State in the future from enforcing the \$2,000.00 limit set forth in 17 V.S.A. § 2805(a) on contributions to political committees that make expenditures to support or oppose candidates in Vermont when the contribution comes from a candidate.

K. In the event the Vermont campaign finance statutes are amended, the amended laws will supersede any inconsistent requirements contained in this Stipulated Judgment Order.

Dated at Burlington, Vermont this 16 day of April 2013.

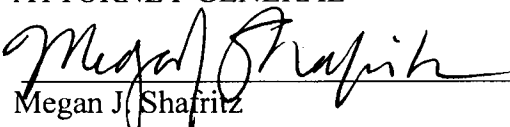
  
\_\_\_\_\_  
Hon. Geoffrey W. Crawford  
Superior Judge, Specially Assigned

Dated in Montpelier, Vermont this 11<sup>m</sup> day of April 2013.

STATE OF VERMONT

WILLIAM H. SORRELL  
ATTORNEY GENERAL

By:

  
\_\_\_\_\_  
Megan J. Shafritz  
Eve Jacobs-Carnahan  
Assistant Attorneys General  
Office of the Attorney General  
109 State Street  
Montpelier, VT 05609-1001  
(802) 828-5527  
mshafritz@atg.state.vt.us

Dated in Burlington, Vermont this 10<sup>th</sup> day of April 2013.

DOWNS RACHLIN MARTIN PLLC

By: Christopher D. Roy  
Christopher D. Roy  
Attorneys for Defendant Republican  
Governors Association  
199 Main Street  
P.O. Box 190  
Burlington, VT 05402-0190  
(802) 863-2375  
croy@drm.com

***Of Counsel:***

Glenn M. Willard, Esq.  
Patton Boggs LLP  
2550 M Street, N.W.  
Washington, DC 20037-1350  
(202) 457-6559  
gwillard@pattonboggs.com

Dated in \_\_\_\_\_ this \_\_\_\_ day of April 2013.

DiGENOVA & TOENSING LLP

By: \_\_\_\_\_  
Brady Toensing, Esq.  
Attorneys for Defendant Brian Dubie  
diGenova & Toensing LLP  
1776 K Street, NW, Suite 737  
Washington, DC 20006  
(202) 289-7701  
brady@digtoe.com

Dated in Burlington, Vermont this \_\_\_\_ day of April 2013.

DOWNS RACHLIN MARTIN PLLC

By: \_\_\_\_\_

Christopher D. Roy  
Attorneys for Defendant Republican  
Governors Association  
199 Main Street  
P.O. Box 190  
Burlington, VT 05402-0190  
(802) 863-2375  
croy@drm.com

*Of Counsel:*

Glenn M. Willard, Esq.  
Patton Boggs LLP  
2550 M Street, N.W.  
Washington, DC 20037-1350  
(202) 457-6559  
gwillard@pattonboggs.com

Dated in Charlotte, Vermont this 9<sup>th</sup> day of April 2013.

DiGENOVA & TOENSING LLP

By: \_\_\_\_\_

Brady Toensing  
Brady Toensing, Esq.  
Attorneys for Defendant Brian Dubie  
diGenova & Toensing LLP  
1776 K Street, NW, Suite 737  
Washington, DC 20006  
(202) 289-7701  
brady@digtoe.com

## SETTLEMENT AGREEMENT

The State of Vermont (the "State"), Danial Emmons ("Emmons"), and Marcy Brigham ("Brigham") hereby agree to resolve the March 2 and March 8, 2017, campaign finance complaints as follows:

WHEREAS, the Vermont Attorney General's Office received complaints on March 2 and March 8, 2017, alleging that Emmons and Brigham had violated campaign finance laws in connection with the South Burlington school board election;

WHEREAS, the State, Emmons, and Brigham agree that the following facts are true and accurate:

1. Brigham and Emmons worked together to run campaigns as write-in candidates in the March 6, 2017, election to the South Burlington school board.
2. Brigham and Emmons each filed campaign finance reports with the Secretary of State's Office on March 3, March 12, and March 24, 2017.

### Contributions in Excess of Limits; Failure to Maintain Campaign Account

3. Emmons received six campaign contribution checks totaling \$1040 Brigham received \$1000 in cash from a single source.
4. Emmons deposited all of the checks in his personal bank account. Neither Emmons nor Brigham maintained a campaign checking account.
5. Emmons established an online fundraising website through GoFundMe. Contributors made \$1160 in contributions through that website. All contributions received through GoFundMe were deposited in Emmons' personal bank account.

6. Each candidate is required to maintain a single campaign checking in accordance with 17 V.S.A. § 2921. Neither Emmons nor Brigham maintained a campaign checking account.
7. Vermont campaign finance law, 17 V.S.A. § 2945(b), prohibits candidates from accepting cash contributions in excess of \$100. Brigham accepted a cash contribution of \$1000 in violation of this provision.
8. Emmons received in-kind contributions from a printing company totaling \$1675 for flyers. As specified in 17 V.S.A. § 2941(a)(1)(A) and adjusted for inflation pursuant to 17 V.S.A. § 2943, the limit on contributions that a local candidate may receive from a single source is \$1020. The contributions Emmons received from the printing company were in excess of the contribution limit.

#### Identification on Electioneering Communications

9. Emmons arranged for the printing of lawn signs promoting the election of himself and Brigham. The lawn signs did not include the name and address of the person who paid for them, as required by 17 V.S.A. § 2972.
10. Emmons purchased two advertisements in the Other Paper promoting the election of himself and Brigham. The ads stated they were “paid for by Marcy and Dan for School Board.” They did not include any address of the person who paid for them. These disclosures were insufficient under 17 V.S.A. § 2972.

#### Related Expenditures by Emmons as Contributions to Brigham

11. By prior arrangement with Brigham, Emmons paid all the expenses for the flyers and advertisements that promoted Brigham’s candidacy for election to school

board. These expenditures were related expenditures in support of Brigham, and are considered contributions pursuant to 17 V.S.A. § 2944(b).

12. Contributions by one candidate to another are subject to the same limits as contributions from other sources. The value of the related expenditures that Emmons made in support of Emmons' and Brigham's candidacy was \$2742.70. The limit on a contribution from a single source to a candidate in a local election is \$1020, as specified in 17 V.S.A. § 2941(a)(1)(A). By accepting the contribution, Brigham violated this provision.
13. By making a related expenditure in excess of the \$1020 limit, Emmons violated 17 V.S.A. § 2941(b), which prohibits a single source from making contributions in excess of the limit on the amount a candidate may receive.

#### Reporting Violations

14. Four of the contributions to Emmons were in excess of \$100. Vermont campaign finance law requires that contributions in excess of \$100 be individually itemized on campaign finance forms stating the name and address of the contributor, the date of contribution, and the amount, as specified in 17 V.S.A. § 2963(a). On the campaign finance reports he filed with the Secretary of State's Office, Emmons only itemized two of the four monetary contributions he received in excess of \$100.
15. The campaign finance reports that Brigham filed erroneously stated that she had received contributions that were received by Emmons. The campaign finance reports that Brigham filed erroneously stated that Brigham had made expenditures, when actually all of the were expenditures were made by Emmons.

Contributions and expenditures are required to be accurately reported in accordance with 17 V.S.A. § 2963.

16. The campaign finance reports filed by Emmons reported various contributions at half the value of what he had actually received. Contributions and expenditures are required to be accurately reported in accordance with 17 V.S.A. § 2963.
17. At the end of the campaign, Brigham had a surplus of \$900. She transferred that surplus to the Rebel Alliance PAC on March 31, 2017. Brigham did not report the disposition of this surplus on her campaign finance report as required by 17 V.S.A. § 2924 & 2968(b).

WHEREFORE, the State, Emmons, and Brigham agree to settle this matter by taking the following actions:

- A. The State covenants and agrees not to sue, or file a complaint or other charge (either civil or criminal), or seek any other legal or administrative enforcement action against Emmons or Brigham for the activities described above.
- B. Emmons and Brigham agree to each pay \$250 to the State as a civil penalty within thirty (30) days of the signing of this Stipulated Settlement.
- C. Emmons and Brigham agree to file campaign finance reports, in form and substance as approved by the Attorney General's Office, with the Vermont Secretary of State's Office for their 2017 campaign for South Burlington school

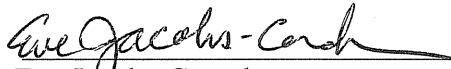


board commissioner within 10 days of signing this Stipulated Settlement.

Dated in Montpelier, Vermont this 17 day of July 2017.

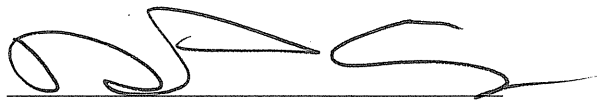
STATE OF VERMONT

THOMAS J. DONOVAN, JR.  
ATTORNEY GENERAL

By:   
Eve Jacobs-Carnahan  
Assistant Attorney General  
Office of the Attorney General  
109 State Street  
Montpelier, VT 05609-1001


Dated in Montpelier, Vermont this 17 day of July 2017.

DANIAL EMMONS

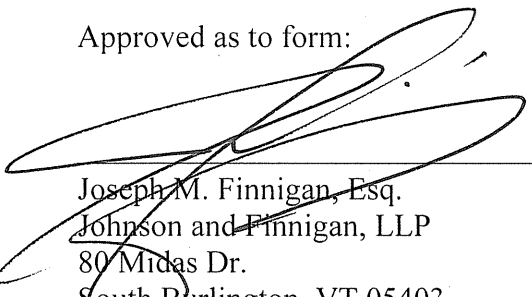
By:   
Danial Emmons  
South Burlington, Vermont

Dated in Montpelier, Vermont this 17<sup>th</sup> day of July 2017.

MARCY BRIGHAM

By:   
Marcy Brigham  
South Burlington, Vermont

Approved as to form:

  
Joseph M. Finnigan, Esq.  
Johnson and Finnigan, LLP  
80 Midas Dr.  
South Burlington, VT 05403  
Attorney for Marcy Brigham and Danial Emmons

STATE OF VERMONT

SUPERIOR COURT  
Washington Unit

2013 NOV 12 A 9 2 CIVIL DIVISION  
Docket No. 758-10-10 Wncv  
*rw*

STATE OF VERMONT, )  
Plaintiff )  
v. )  
GREEN MOUNTAIN FUTURE, )  
Defendant )

STIPULATED JUDGMENT ORDER

By and through their undersigned counsel, Plaintiff State of Vermont (the "State") and Defendant Green Mountain Future hereby stipulate and agree that the Court enter the following Judgment Order in the above-captioned matter:

The Court hereby assesses a civil penalty against Green Mountain Future to be paid to the State within 30 days of the entry of this Stipulated Judgment Order in the amount of \$20,000 with respect to the claims set forth in Count I of the Complaint.

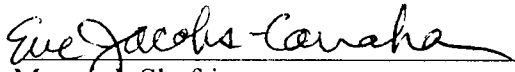
The Judgment shall also reflect the penalties imposed by this Court's Order of December 29, 2011, which was affirmed by the Supreme Court in Case No. 2012-072 on September 27, 2013. Namely, with respect to the claims set forth in Count II of the Complaint, Green Mountain Future shall, within 30 days of the entry of this Stipulated Judgment Order, pay a civil penalty to the State in the amount of \$10,000 and bring itself into compliance with Vermont's campaign finance laws by registering as a political committee and filing the required reports with the

Secretary of State's Office for the months September – December 2010.

Dated in Montpelier, Vermont this 6th day of November 2013.

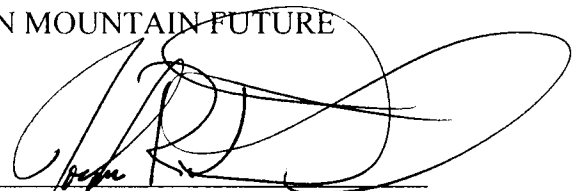
STATE OF VERMONT

WILLIAM H. SORRELL  
ATTORNEY GENERAL

By:   
Megan J. Shafritz  
Eve Jacobs-Carnahan  
Assistant Attorneys General  
Office of the Attorney General  
109 State Street  
Montpelier, VT 05609-1001  
(802) 828-5527  
mshafritz@atg.state.vt.us  
ejacobs@atg.state.vt.us

Dated in Montpelier, Vermont this 8th day of November 2013.

GREEN MOUNTAIN FUTURE

By:   
Joshua R. Diamond, Esq.  
Diamond & Robinson, P.C.  
P.O. Box 1460  
Montpelier, VT 05601-1460  
(802) 223-6166  
jrd@diamond-robinson.com

SO ORDERED:

Dated at Montpelier, Vermont this 12 day of November 2013.

  
Superior Judge

VT SUPERIOR COURT  
STATE OF VERMONT

SUPERIOR COURT  
Washington Unit

CIVIL DIVISION  
Docket No. 759-10-10 Wncv

Stip ~~17~~

2015 MAR 17 P 3:49

STATE OF VERMONT,

Plaintiff

v.

REPUBLICAN GOVERNORS  
ASSOCIATION,

Defendant

FILED

**STIPULATED JUDGMENT ORDER**

By and through their undersigned counsel, Plaintiff State of Vermont (the "State") and Defendant Republican Governors Association (the "RGA") hereby stipulate and agree that the Court enter the following Judgment Order in the above-captioned matter:

WHEREAS, the State brought this enforcement action against the RGA alleging violations of Vermont's campaign finance laws; and

WHEREAS, the Court ruled that the RGA violated 17 V.S.A. § 2831 by failing to register as a political committee, violated 17 V.S.A. § 2811 by failing to file campaign finance reports, and violated 17 V.S.A. § 2805(a) by accepting contributions in excess of the \$2,000 limit for political committees; and

WHEREAS, both parties now agree to forego an appeal of the Court's determinations to date in this action; and

WHEREAS, at all times material hereto, the RGA attempted in good faith to comply with Vermont's campaign finance laws and now wishes to resolve this matter without further litigation; and

WHEREFORE, as agreed by the State and the RGA, the Court hereby orders that judgment in this action shall be entered as follows:

1. The Court hereby enters judgment in favor of the State against the RGA with respect to the claims set forth in Counts I and II of the Complaint for violations of 17 V.S.A. §§ 2831, 2811, and 2805(a).

2. The Court hereby assesses a civil penalty against the RGA to be paid to the State within thirty (30) days of the entry of this Stipulated Judgment Order in the amount of Forty Thousand Dollars (\$40,000) with respect to the claims set forth in Counts I and II of the Complaint.


3. The Court further orders that the RGA shall bring itself into compliance with Vermont's campaign finance laws within thirty (30) days of the date herein by filing the required reports with the Secretary of State's office for the 2009-2010 general election cycle. Such reports shall list the RGA's 2010 Vermont expenditures that were admitted in Defendant's Response to Plaintiff's First Set of Interrogatories, dated January 5, 2011, and the Vermont contributions it received from Rodolphe Vallee and Richard Tarrant.

Dated in Montpelier, Vermont this 17<sup>m</sup> day of March 2015.

STATE OF VERMONT

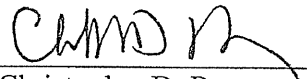
WILLIAM H. SORRELL  
ATTORNEY GENERAL

By:

  
Megan J. Shafritz  
Eve Jacobs-Carnahan  
Assistant Attorneys General  
Office of the Attorney General  
109 State Street  
Montpelier, VT 05609-1001  
(802) 828-5527  
megan.shafritz@state.vt.us

Dated in Burlington, Vermont this 12<sup>th</sup> day of March 2015.

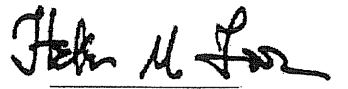
DOWNS RACHLIN MARTIN PLLC

By:   
Christopher D. Roy  
Attorneys for Defendant Republican  
Governors Association  
199 Main Street, P.O. Box 190  
Burlington, VT 05402-0190  
Tel.: (802) 863-2375  
Email: croy@drm.com

***Of Counsel:***  
Glenn M. Willard, Esq.  
Patton Boggs LLP  
2550 M Street, N.W.  
Washington, DC 20037-1350  
Tel.: (202) 457-6559  
Email: gwillard@pattonboggs.com

SO ORDERED:

Dated in Montpelier, Vermont this 23 day of March 2015.

  
Hon. Helen M. Toor  
Superior Court Judge

15793154.2

## SETTLEMENT AGREEMENT

The State of Vermont (the "State") and Vermont Leads PAC hereby agree to resolve the September 12, 2014, campaign finance complaint as follows:

WHEREAS, on September 12, 2014, a complaint was filed with the Vermont Attorney General's Office alleging that Vermont Leads PAC had violated campaign finance laws in 2012 and 2014;

WHEREAS, the State and Vermont Leads PAC agree that the following facts are true and accurate:

1. Vermont Leads PAC was an independent expenditure-only political committee that advocated in support of candidates who supported legislation to create a single-payer health care system in Vermont. It was established by Vermont Leads, Inc., a non-profit entity, in October 2012.

2. After the general election in 2012, Vermont Leads PAC filed a "final" campaign finance report with the Vermont Secretary of State indicating that it had closed out its activities and ceased operations on December 11, 2012, by transferring \$27,896 to "VT Leads." It further stated that it was carrying over zero surplus to the next general election campaign cycle.

3. Despite filing a report in 2012 indicating that Vermont Leads PAC had ceased its operations, the PAC spent approximately \$500 on an advertisement in the Brattleboro Reformer in August 2014 in support of a candidate for the Vermont Senate.

4. On September 2, 2014, Vermont Leads PAC filed a campaign finance report with the Secretary of State showing it received no contributions in the 2014 general election cycle. The report also indicated that it had carried over \$11,172 from the previous campaign cycle.

This September 2014 disclosure contradicted the December 2012 final report filed by Vermont Leads PAC.

5. On September 19, 2014, the Attorney General's Office notified Vermont Leads PAC that it had received a complaint about its activities and reports. On September 26, 2014, Vermont Leads PAC filed a number of amended campaign finance reports as well as several missing reports.

6. The newly filed reports included the following:

- a. Amended report for November 2012
- b. Amended report for December 2012
- c. Report for July 2013, not previously filed
- d. Report for March 2014, not previously filed
- e. Report for July 2014, not previously filed

7. The filing of these reports corrected inaccurate statement made in prior reports.

These inaccurate statements included the statement in December 2012 that Vermont Leads PAC was closing out its operations and not carrying over any funds to the 2014 campaign. This inaccurate statement had remained in place for nearly two years until the campaign finance complaint was brought to the attention of Vermont Leads PAC.

8. Vermont Leads PAC had an obligation under by 17 V.S.A. § 2811 and 17 V.S.A. § 2964 to file accurate and timely campaign finance reports. Its failure to do so was violation of those provisions of Vermont's campaign finance law.

WHEREFORE, the State and Vermont Leads PAC agree to settle this matter by taking the following actions:



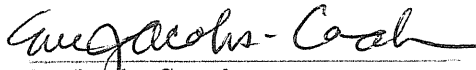
A. The State covenants and agrees not to sue, or file a complaint or other charge (either civil or criminal) or seek any other legal or administrative enforcement against, Vermont Leads PAC, its employees, or agents for violations of Vermont's campaign finance statutes based on any activity conducted by or on behalf of Vermont Leads PAC in the 2012 and 2014 Vermont general election cycles.

B. Vermont Leads PAC agrees to pay \$1,000 to the State as a civil penalty within thirty (30) days of the signing of this Stipulated Settlement.

Dated in Montpelier, Vermont this 28<sup>th</sup> day of June 2016.

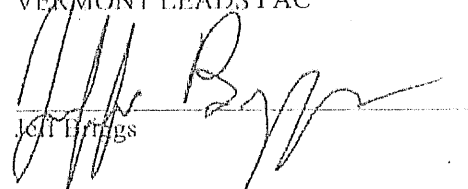
STATE OF VERMONT

WILLIAM H. SORRELL  
ATTORNEY GENERAL


By:   
Eve Jacobs-Carnahan  
Assistant Attorney General  
Office of the Attorney General  
109 State Street  
Montpelier, VT 05609-1001  
(802) 828-3176

Dated in Montpelier, Vermont this 28 day of June 2016.

VERMONT LEADS PAC

By:   
Jeff Briggs

Approved as to form:



Ian P. Carleton, Esq.  
Sheehey, Furlong & Behm  
P.O. Box 66  
Burlington, VT 05402  
Attorney for Vermont Leads PAC

## SETTLEMENT AGREEMENT

The State of Vermont (the "State") and Vermont Leads, Inc. hereby agree to resolve the September 12, 2014, campaign finance complaint as follows:

WHEREAS, on September 12, 2014, a complaint was filed with the Vermont Attorney General's Office alleging that Vermont Leads had violated campaign finance laws in 2014;

WHEREAS, the State and Vermont Leads, Inc. ("Vermont Leads") agree that the following facts are true and accurate:

1. Vermont Leads accepted a contribution in excess of \$4,000 from a single source in March 2014. On July 29, 2014, Vermont Leads announced that it was endorsing ten candidates for election to the Vermont Legislature who supported passage of legislation creating a single-payer health care system.

2. Vermont Leads made direct expenditures in support of candidates for Vermont office on August 4, 2014. By the end of the election cycle, it had made expenditures of more than \$7,000, most of which were direct contributions to candidates.

3. Vermont Leads met the definition of a political committee at least as early as August 4, 2014, by which time it had received contributions and made expenditures greater than \$1,000 in any two-year general election cycle. Accordingly, it was required to register as a political committee no later than August 14, 2014, ten days after qualifying as a committee, pursuant to 17 V.S.A. § 2922(a)(1). Vermont Leads failed to register in violation this provision.

4. The Attorney General's Office notified Vermont Leads on September 19, 2014, of a complaint about its campaign finance activities. Shortly thereafter, Vermont Leads took steps to bring itself into compliance with the legal provisions of Vermont's campaign finance law. It filed a registration statement with the Secretary of State's Office, registering as a political

committee on October 1, 2014. It opened a separate bank account for its political committee funds.

---

5. Political committees are prohibited from accepting contributions in excess of \$4,000 from a single source, as specified in 17 V.S.A. § 2941(a)(4). Because of Vermont Leads' August 2014 expenditures in support of candidates, the contribution it received in March 2014 violated this provision. In September and October 2014, Vermont Leads received individual contributions in amounts less than \$4,000 sufficient to fund the expenditures that it made in the 2014 general election cycle.

WHEREFORE, the State and Vermont Leads agree to settle this matter by taking the following actions:

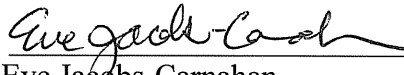
A. The State covenants and agrees not to sue, or file a complaint or other charge (either civil or criminal) or seek any other legal or administrative enforcement action against, Vermont Leads, its directors, officers, employees, and agents for violations of Vermont's campaign finance statutes based on any activity conducted on behalf of Vermont Leads in the 2012 and 2014 Vermont general election cycles.

B. Vermont Leads agrees to pay \$2000 to the State as a civil penalty, \$1,500 of which to be paid within thirty (30) days of the signing of this Stipulated Settlement, and the remaining \$500 to be paid by December 31, 2016.

Dated in Montpelier, Vermont this 11<sup>th</sup> day of ~~June~~ <sup>July</sup> 2016.

STATE OF VERMONT

WILLIAM H. SORRELL  
ATTORNEY GENERAL

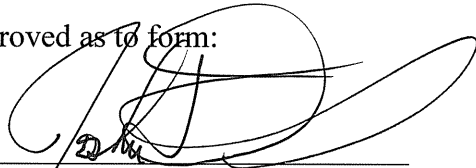
By:   
Eve Jacobs-Carnahan  
Assistant Attorney General  
Office of the Attorney General  
109 State Street  
Montpelier, VT 05609-1001  
(802) 828-3176

Dated in Montpelier, Vermont this 28 day of June 2016.

VERMONT LEADS, INC.

By:   
Peter Sterling, Treasurer

Approved as to form:



Joshua Diamond, Esq.  
Diamond & Robinson, P.C.  
P.O. Box 1460  
Montpelier, VT 05601-1460

Attorney for Vermont Leads, Inc.