

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).

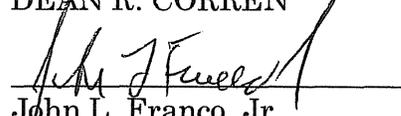
FURTHER, Corren, on behalf of himself, his heirs, executors, successors, assigns, campaign staff, advisers, and agents, agrees to release and forever discharge the State, its departments, agencies, and all present and former employees, officers, agents and representatives, from any and all claims and 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.

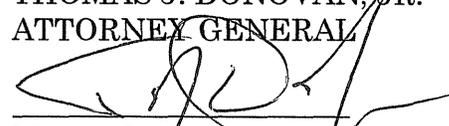
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Counsel for Dean R. Corren

Dated at Montpelier, Vermont, this 20th day of November 2017.

STATE OF VERMONT

THOMAS J. DONOVAN, JR.
ATTORNEY GENERAL

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