

From: "[REDACTED]. (USAFLS)" <[REDACTED]>

To: "Brad Edwards" <[REDACTED]>

Cc: "[REDACTED] (USAFLS)" <[REDACTED]>

Subject: Re: Confidential Settlement Negotiations

Date: Thu, 19 May 2016 20:45:46 +0000

Importance: Normal

Hi Brad -- FBI FOIA counsel made some changes to paragraphs 3 and 4. Ed is going to send to you soon. Their main concern is if they appear to be giving preferential treatment to you, they will be sued by others.

Btw, we still need docket number of item Paul wants unsealed.

Thx.

[REDACTED]
Assistant US Attorney
[REDACTED]
[REDACTED]
[REDACTED]

> On May 17, 2016, at 5:56 PM, Brad Edwards <[REDACTED]> wrote:

>

> I was waiting to hear back from Courtney and Paul and Jay Howell. You and I should talk this week. I am speaking most of tomorrow in Palm beach but can call on my way home.

>

> Sent from my iPhone

>

>> On May 13, 2016, at 8:15 AM, [REDACTED]. (USAFLS) <[REDACTED]> wrote:

>>

>> Good luck today. I will be on a flight until 11:00 or so.

>>

>> [REDACTED]

>> Assistant US Attorney

>> [REDACTED]

>> [REDACTED]

>> [REDACTED]

>>

>> On May 13, 2016, at 5:55 AM, Brad Edwards <[REDACTED]> <mailto:[REDACTED]>> wrote:

>>

>> I will call you today. I have been in depositions on another abuse case and actually I will be in the deposition of a 7 year old today. I would hope the defense will not try to beat up this little girl so the deposition should be relatively short. I'll call you afterwards.

>>

>> Sent from my iPhone

>>

>> On May 13, 2016, at 12:32 AM, [REDACTED]. (USAFLS)

<[REDACTED]> <mailto:[REDACTED]>> wrote:

>>

>> Hi Brad - I left you a message this afternoon but haven't heard back. I am going to be out of town starting

tomorrow and I wanted to get this draft settlement agreement to you before I left. I have been working closely with [REDACTED] on this, so if you have proposed changes, please give him a call ([REDACTED]) or send him an email (he is cc'd above). I wanted to discuss it with you before the mediation, though, so if you could call me on my cell tomorrow, I would appreciate it.

>>

>> You will see that the agreement references a number of Appendices - the first is the list of victim names and I was hoping to use the list that you already have in your possession that you read to me over the phone so that there is no need to get a court order allowing us to provide a list. The second is the list of proposed changes to the AG Guidelines and Ombudsman procedures. The third is the list of proposed changes to the USAM. We also need a reference to the docket entry number and a copy of the document that you want unsealed so that we can review and determine that we are in agreement.

>>

>> Finally, we are waiting for final word from FBI about their obligations under paragraphs 3 & 4, so please treat this as a draft. Ed or I will let you know when we have received their concurrence.

>>

>> The bad news is that the Crime Victim higher-ups at DOJ were not able to find any source of funding for counseling services. The FBI apparently also does not have a source of funds.

>>

>> Give me a call and we can discuss the agreement and logistics.

>>

>> Take care.

>> [REDACTED]

>>

>>

>> [REDACTED]

>> Assistant U.S. Attorney

>> Southern District of Florida

>> [REDACTED]

>> [REDACTED]

>> [REDACTED] <mailto:[REDACTED]>

>> [REDACTED]

>>

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>> <20160512 Jane Doe Settlement Agrmt - 501pm.pdf>

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