



Settlement Term Sheet


1. A settlement has been reached in the matter of Brainerd Firefighters Union, Local 4725 (IAFF), and Mark Turner, its President v. City of Brainerd.
2. The following constitutes a summary of the material terms of settlement and a formal settlement agreement will be executed by the parties.
3. The City of Brainerd will pay \$3.9 million (\$3,900,000) and Plaintiffs' counsel will direct how this sum shall be paid. There shall be no reinstatement of the firefighters.
4. The City of Brainerd will pay the full mediation fee.
5. The material terms of settlement set forth in this term sheet are binding and cannot be changed or revoked.
6. This settlement is subject to the approval of the governing body of the City of Brainerd, which shall be pursued promptly.
7. As part of the final settlement agreement, the parties will enter into full and complete general releases. The parties agree that they shall stipulate to an order barring and forever discharging any and all claims.
8. The representatives of the parties signing this term sheet have full authority to bind the parties to these terms of settlement.
9. Any dispute that arises as to the terms to be included in the final settlement agreement, will be brought to Judge Keyes for binding arbitration.

City of Brainerd

By: 
Its: *City Administrator*
Date: *8/8/2022*

Firefighters Union Local 4725

By: 
Its: *President*
Date: *8/8/22*

By: 
Its: *Vice President*
Date: *8/8/22*



Mark Turner, Plaintiff