

EXHIBIT A

SETTLEMENT AGREEMENT TERM SHEET

The following prescribes the binding, essential terms of the final settlement between Robert Martin, Pamela Hawkes, and Robert Anderson (“Plaintiffs”) and the City of Boise (“Defendant”) (together with Plaintiffs, “the Parties”) in the matter *Martin et al v. City of Boise et al*, 1:09-cv-0540-REB.

Proceedings and Claims to be Settled

Upon signature of this Term Sheet, the Parties agree to a full and final resolution of all claims in the above-captioned case. The Settlement Agreement, attached hereto as **Exhibit B**, constitutes the binding terms of settlement as agreed to by the Parties, and shall be enforceable to the fullest extent of the law.

Terms of Settlement

The Parties agree to be bound by the terms of the Settlement Agreement, attached as **Exhibit B**. The Settlement Agreement incorporates, and is conditioned in part on, amendment of Section 7-3A-2 of the Boise City Code (“Camping Ordinance”) and Section 5-2-3 of the Boise City Code (“Disorderly Conduct Ordinance”) as agreed to by the Parties. The ordinances, as they will be amended, are attached to this Term Sheet as **Exhibit C** (Camping Ordinance) and **Exhibit D** (Disorderly Conduct Ordinance) respectively.

Dismissal of the Action

The Parties agree to seek dismissal of the above-captioned case by joint stipulation, with the following conditions:

- a. The Parties agree that dismissal of the case with prejudice is conditioned on (1) approval by the City of Boise of the terms of the Settlement Agreement; (2) the appropriation of funds by the City of Boise, as outlined in the Settlement Agreement; and (3) the amendment of the Camping and Disorderly Conduct Ordinances to conform with Exhibits C and D, respectively. (“Conditional Terms”).
- b. Upon satisfaction of the Conditional Terms, the Parties agree to a full and final release of all claims including any claims for damages, fees, and costs. The Parties understand that the completion of other terms set forth in the Settlement Agreement is not required prior to the execution of that full and final release, but remain binding obligations.

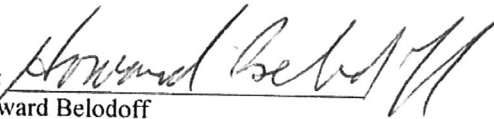
Homeless Initiative Funds, Damages, and Fees

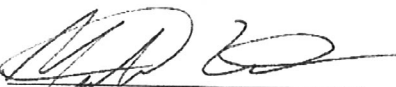
The Parties agree to the payment of Boise Homeless Initiative funds, damages, and attorneys’ fees and costs as outlined in the Settlement Agreement.


Binding Agreement

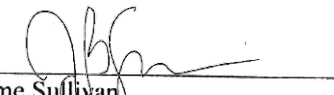
By signing this Term Sheet, the Parties agree to all terms herein, and to the terms of the Settlement Agreement as incorporated by reference.


Dated: February 8, 2021

By: 
Howard Belodoff
Associate Director, Idaho Legal Services, Inc.

By: 
Michael Bern
Partner, Latham & Watkins LLP

By: 
Eric Tars
Legal Director, National Homelessness Law Center

By: 
Jayme Sullivan
City Attorney, City of Boise

By: 
Courtney Washburn
Chief of Staff to the Mayor, City of Boise