

**United States Department of Agriculture****Settlement Agreement****Discrimination Complaint of John W. Boyd, Jr.**

This settlement agreement is made by and between the complainant, John W. Boyd, Jr., and the United States Department of Agriculture ("USDA"). This agreement constitutes a full, complete, and final settlement of all claims for relief in connection with the complaint of racial discrimination submitted by the complainant on February 18, 1992, and USDA's final decision on such complaint dated October 11, 1996, (attached to this agreement).

**I. USDA agrees to:**

1. Pay the complainant the sum of \$ [REDACTED] in compensatory damages. A check in this amount payable to the complainant and Clarence N. Jenkins, Jr., Esq., will be issued as soon as practicable but no later than 60 days after this agreement has been signed by all parties.

2. Pay any and all of John W. Boyd, Jr.'s unpaid outstanding debt owed to the Farm Service Agency, former Farmers Home Administration, and the Rural Housing Service. USDA, the Farm Service Agency, and Rural Housing Service, will forever discharge, hold harmless, and indemnify John W. Boyd, Jr. from any liability for such debt.

**II. Complainant agrees to:**

1. Accept the above payment of compensatory damages, and debt forgiveness as a full, final, and complete settlement of all claims in connection with his February 18, 1992, discrimination complaint and USDA's final decision dated October 11, 1996.

2. Waive and release any and all claims or complaints of any kind arising out of the events that were the subject of the complainant's February 18, 1992, discrimination complaint and USDA's final decision dated October 11, 1996, against USDA, the United States of America, any other agency of the United States of America, or any officer, employee, or agent of the United States of America, in either his or her official or individual capacity.