

**DEPARTMENT OF JUSTICE  
FEDERAL BUREAU OF PRISONS  
IN THE MATTER OF SETTLEMENT BETWEEN**

American Federation of Government Employees Council of Prison Locals 33 Local 3584	)	
	)	Re: Grievance Filed
	)	January 15, 2016
	)	Untimely Payment
	)	of Overtime
AND	)	
	)	Date: February 18, 2016
	)	
U.S. Department of Justice	)	
Federal Bureau of Prisons	)	
Federal Correctional Institution	)	
Dublin, California	)	

**~SETTLEMENT AGREEMENT~**

In full and final settlement of the above-referenced matter, the United States Department of Justice, Federal Bureau of Prisons, Federal Correctional Institution, Dublin, California, (hereafter the Agency) and the American Federation of Government Employees, Local 3584 (hereafter the Union), collectively the parties, freely and voluntarily agree to the following terms and conditions:

1. It is stipulated and agreed by the Union and the Agency, that in exchange for valid consideration (the receipt and sufficiency of which is hereby acknowledged) the Union agrees to resolve and withdraw all pending issues and/or complaints concerning untimely payment of overtime, which have or could have been raised in any administrative or judicial forum as of the date this agreement is executed, excluding FMCS Case Number 141120-51263-A and 140527-56049-A. This is a total release of all claims by the Union, involving untimely payment of overtime.

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[Signature] 2/18/16  
Initial/Date

2. The Union agrees not to file any other type of complaint, legal action or appeal in any forum based upon any of the facts or issues concerning untimely payment of overtime. The Union further agrees that their respective signatures on this agreement is a request to immediately withdraw and/or dismiss any pending actions, grievances, or complaints which have or could have been filed concerning the facts surrounding untimely payment of overtime.

3. Entering into this Settlement Agreement does not constitute an admission of liability, fault, wrong-doing, or violation of law, rules or regulations by the Agency.

4. The parties agree as follows: employees will be paid according to the attached list.

5. The Agency agrees these payments will begin being processed within 30 days from the signed date of this agreement.

6. The Union declares they have read and reviewed this Settlement Agreement and fully understand the terms of such Settlement Agreement. The Union further declares they voluntarily accept this agreement for the purpose of making full and final compromise of all claims concerning untimely payment of overtime which were made or could have been made in connection with the cause(s) of action and facts known or unknown to the Union as of the date this Settlement Agreement is executed and that all agreements and understandings of the parties have been included in this Settlement Agreement and are expressed herein.

7. The parties agree that this Settlement Agreement is being entered into due to the unique circumstances of this matter and it is not to be precedent for any other

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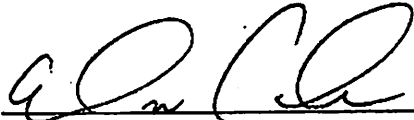
case.

8. Nothing in this Settlement Agreement shall affect Management's Rights under the Master Agreement, Federal Regulations or Statutes.


9. Should a dispute arise regarding the implementation of this Settlement Agreement, the Union expressly agrees not to seek enforcement of this agreement until first contacting the Human Resource Manager, FCI Dublin, in an attempt to resolve any difference of interpretation of the terms of the agreement and/or to have the Federal Bureau of Prisons cure an asserted failure of performance of the terms of the agreement.

10. There are no other terms to this agreement other than those expressly written here. The agreement binds the Union; the Federal Bureau of Prisons and the parties' heirs, assigns, agents, and successors. This agreement may not be modified except by a writing signed by each party or that party's agent.

11. The agreement is eight pages in length which includes a five page attachment (Attachment A) and has eleven numbered paragraphs.


  
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Union Representative  
Union Local 3584

2-18-16  
Date

  
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Charleston C. Iwuagwu  
Warden, FCI Dublin

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Date

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