

3. As part of BSA's Risk Management and self insurance programs, all members, which would include Andrew Schmidt on May 9, 2009, were instructed to follow the policy written in the Guide to Safe Scouting concerning reporting deaths or serious injuries.
4. It was, and still is the Risk Management policy of BSA and SFC to obtain reporting on incidents involving deaths or serious injuries in anticipation of litigation. When an adult member learns of such an incident, it is his/her responsibility to inform his/her council's Scout Executive who is then charged with preparing for BSA's Risk Management a "Preliminary Report of Fatal or Serious Injury or Illness" and forwarding that Report to the Director of the Health and Safety Service at BSA's headquarters. These Risk Management procedures are followed by SFC and BSA at the direction of legal counsel and constitute claims handling procedures in anticipation of possible litigation.
5. After the incident which is subject to the above-captioned litigation, Andrew Schmidt followed the Risk Management procedures and informed Jeff Hunt, the Scout Executive for the South Florida Council, of the incident involving Michael Sclawy-Adelman.
6. Within one day, Andrew Schmidt reported the incident in question to Jeff Hunt pursuant to the Risk Management/Claims handling policies.
7. The reporting policy exists primarily for self-insurance and claims-related purposes. A claim involving a Troop activity, such as in the present matter, may trigger BSA's general liability self-insured program.
8. The primary purposes of the procedures leading to Mr. Schmidt e-mailing Mr. Hunt details of the subject incident was to assist BSA Risk Management and to prepare for any litigation that may arise out of Michael Sclawy-Adelman's death.

FURTHER AFFIANT SAYETH NAUGHT



JOSHUA CHRIST

STATE OF FLORIDA)
) SS.
COUNTY OF MIAMI-DADE__)

The foregoing instrument was acknowledged before me this 20 day of July, 2011, by Josh Christ, who is personally known to me, or who has produced Drivers License as identification, and who did take an oath.

Bette Lou - Phillips

Signature of person taking acknowledgment

(Seal)

NOTARY PUBLIC) FLORIDA
Bette Lou Phillips
Commission # D897953
Expires) 10, 2013
BONDED THROUGH) SURETY CO., INC.

Name of officer taking acknowledgment

Title or rank

Serial number