

February 7, 2020

Via E-Mail

Diane A. Calta, Esq. Director of Law City of Beachwood 25325 Fairmount Boulevard Beachwood, Ohio 44122

Re: Employment Matters
Rule 408 Communication

Dear Diane:

The undersigned is counsel for		in relation to the	in relation to the above referenced matter.	
As you are aware,	commenced her en	nployment with The	City of Beachwood ("The	
City"), as	She started as an		and due to her excellent	
performance was promoted in December of 2016. Additio		. Additionally,	serves as	
along with her duties as				
Ctanting in Tanana	- COO10 1 1 C X	A ' O TT '		

Starting in January of 2018, shortly after Martin S. Horwitz was sworn in as the Mayor ("Horwitz"), my client was subjected to actions from Horwitz that were inappropriate in the workplace. Specifically, there was an instance where Horwitz was looking down my client's shirt and made an inappropriate comment about her tattoo that was partially showing. This of course made uncomfortable. Additionally, there were multiple occasions, with coworkers present, when Horowitz made inappropriate and demeaning comments about other employees including Members of City Council and the Fire Department.

There was also an incident in July of 2019 when Horwitz made a sexually provocative comment that he should punish (an implied spanking). This comment was in relation to discovering and correcting a typographic error on a piece of correspondence and returning to Horwitz to re-sign. In fact, in that instance, my client specifically indicated to Horwitz that he cannot talk to her that way. Horwitz also commented on appearance on an occasion where she had been out sick but returned later in the day to participate in that night's City Council Meeting.

Styled her appearance differently that day and Horwitz said "What is this look? I like this look."

perceived this comment to be made in an inappropriate manner. This improper behavior continued for a period of time and ended fairly recently.

At this time, my client would like to discuss an appropriate resolution of this matter which will include a written assurance that no further conduct will occur along with a payment in the amount of \$25,000.00.

Your prompt response is requested.

Very truly yours,

Brian Green

BG:c2
cc:
P:\Brian \(\text{Calta.Final.ltr.} \)