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June 15, 2018

VIA ELECTRONIC MAIL ONLY – khoskins@rivierabch.com

Karen Hoskins
City Manager
City of Riviera Beach
600 West Blue Heron Blvd.
Riviera Beach, Florida 33404

Re: Jonathan Evans

Dear Karen,

Former City Manager, Jonathan Evans has recently filed two claims relative to the conclusion of his employment. One claim is with the EEOC and one claim is a lawsuit. The lawsuit was filed in Federal Court and claims the City:

- 1) Deprived him of a Property Interest in his employment;
- 2) Deprived him of a Property Interest as to his severance package;
- 3) Deprived him of his Liberty Interest; and
- 4) Breached his employment agreement.

Mr. Evans is suing the City and Councilmembers Hubbard and Davis, and former Councilmember Pardo, in both their official and individual capacities. We previously had discussions with his attorney regarding the possibility of pre-suit mediation. Under his employment contract, Mr. Evans may be entitled to approximately \$90,000.00 in severance pay if he was terminated without cause. Mr. Evans was seeking approximately \$160,000 from the City. There is a possibility of liability.

As mentioned, Mr. Evans also filed an EEOC charge, to which we will file an appropriate response. The EEOC has invited the parties to participate in mediation. You may want to place the EEOC's request on the City Council's agenda so that they can provide direction as to whether

they would want the City to participate in mediation or whether we should decline the EEOC's invitation to mediate. I would suggest that, if the Council agrees to have the City participate in mediation, that it would be a global mediation to resolve all his claims, including the EEOC claim and the federal lawsuit.

If you have any question, please contact me.

Sincerely,

/s/ Glen J. Torcivia

Glen J. Torcivia

cc: Andy Degraffenreidt