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March 10, 2022

Kristen Bronson
Denver City Attorney
kristin.bronson@denvergov.org

By Electronic Mail

RE: Settlement for Discrimination and Defamation.

Dear Ms. Bronson,

Please be advised that Ms. Kimberly Palmer, Esq., has retained undersigned counsel to address the blatant discrimination, defamation, and outrageous conduct she experienced at the hands of fellow attorneys, including her supervisor Emily Reisdorph ('Attorney Reisdorph'). Attorney Reisdorph was tasked with training and mentoring Ms. Palmer, and instead participated in undermining and ridiculing her. It goes without saying that these attorneys should be held to the highest standards of conduct, standards that it cannot even be said they fell short of. These standards were deliberately disregarded and as such, given the nature of the egregious facts at hand, we invite your office to engage in settlement discussions with Ms. Palmer.

To add insult to injury, Ms. Palmer was forced to learn of the actions your office has taken to discipline the involved attorneys via the media- actions that did not include addressing the significant and ongoing harms she has suffered. Attorney Reisdorph, tasked with training Ms. Palmer, intentionally failed to do so, then berated Ms. Palmer for failing to perform the very duties Denver City Attorney Reisdorph failed to train her on. Attorney Reisdorph went on to demand credit from co-conspirators attorneys Eric Reece and Kristina Bush for the foreseeable harms Ms. Palmer experienced:

Reisdorph responded [to a communication from Bush revelling in Ms. Palmer's nervous breakdown], "You can't take credit for that all on your own. We pushed her

too far... we sent her into a nervous breakdown.” Bush boasted, “Because really, this is our doing.”¹

There can be no question that the actions of Bush, Reece, and Reisdorph were intentional and reckless, causing Ms. Palmer significant injury. Indeed, your investigation of Ms. Reisdorph finds a deliberate consistent pattern of creating a hostile work environment and regular disparagement.² “We pushed her too far . . . this is really our doing” indicates blatant and plain intentionality of their conduct and acknowledgement of fault. So too did these Denver attorneys show their intention to cause significant injury when they took credit for causing Kimberly Palmer to quit by continuing to communicate in a “Microsoft Teams chat entitled Kimberly Killers.”³ These actions and statements were not, as “[a]dministrators in the City Attorney's Office termed the conversations[,] “racially insensitive,”⁴ but glaring racial animus and discrimination.

Though she was able to go on and work effectively in other prosecution offices, Ms. Palmer did so while suffering greatly. Simply put, but for the outrageous and intentional conduct of Denver city attorneys Bush, Reece, and Reisdorph, Ms. Palmer would not have required medical treatment for the severe emotional distress and been forced to seek other, lower-paying employment.

This treatment by Ms. Palmer’s colleagues caused such a brittle psychiatric state that her physician ordered an employment related mental health leave—an intentional pain of which your employees delighted in exacting upon Ms. Palmer. Helpless to protect her mental health and professional reputation at your office, Ms. Palmer, constructively terminated, then resigned from her position, accepting lower paying employment in a nearby county to escape the abuse of her Denver City Attorney colleagues.

Thereafter, due to these financial constraints, Ms. Palmer then relocated out of state to resume her professional role commensurate with her skills and experience. This was very much as predicted in the City’s own discipline letter to Reisdorph documenting Reisdorph’s statement that “[Kimberly Palmer will] never get a prosecutor job in Colorado.”⁵ She continues to suffer the mental anguish and the associated symptoms resulting from the shocking abusive treatment of your employees.

We have advised Ms. Palmer that she has an incredibly strong legal case and are prepared to file a lawsuit clearly documenting the outrageous conduct, discrimination, defamation, and the resulting harms caused to her financially, mentally, and professionally.

¹ Brian Maas *Brad Is An Idiot’: Denver City Attorney’s Mocked Bosses, Confessed To Loafing While Working From Home During Pandemic*, CBS DENVER (Mar. 8, 2022), <https://denver.cbslocal.com/2022/03/08/denver-city-attorneys-working-from-home-pandemic/>.

² Letter from Marley Bordovsky Denver Section Director of Prosecution and Code Enforcement, to Emily Reisdorph RE: *Notification of 1-Day Suspension Disciplinary Action* (Oct. 15, 2020). (On file with authors).

³ *Id.*

⁴ Maas *supra* Note 1.

⁵ *Id.*

Based upon the foregoing and other factors, undersigned invites your office to consider a good faith settlement of this matter. A settlement will avoid the expense of litigation in this case, an unnecessary expense based on well-settled law, strongly in Ms. Palmer's favor. Please advise our office of your decision by close of business, **Thursday, March 24, 2022**.

Sincerely,

A handwritten signature in black ink, appearing to read "Darren O'Connor". The signature is somewhat stylized and cursive.

Darren O'Connor

A handwritten signature in blue ink, appearing to read "Jenipher Jones". The signature is cursive and fluid.

Jenipher Jones

Page(s): (3)

Enclosure(s): N/A

Attachments: Preservation Letter