

15/16 3631

FILE WITH:

City Clerk's Office
11222 Acacia Parkway
P.O. Box 3070
Garden Grove, CA 92842-3070

CITY OF GARDEN GROVE

CLAIM FOR DAMAGES

To Persons or Property

Claim No. _____

For Official Use Only

A claim must be filed with the City Clerk of the City of Garden Grove within 6 months after which the incident or event occurred. Be sure your claim is against the City of Garden Grove, not another public entity. Where space is insufficient, please use additional paper and identify information by paragraph number.

To City of Garden Grove, California:

Ms.

Mr.

Mrs.

Miss

1. NAME OF CLAIMANT: Broadwater Jeremy J.
(Last) (First) (Middle)

a. HOME ADDRESS OF CLAIMANT: _____
(Number, Street, Apt, etc.) (City and State) (Zip)

b. BUSINESS ADDRESS OF CLAIMANT: 11301 Acacia Pkwy, G.G. CA 92840
(Number, Street, Suite, etc.) (City and State) (Zip)

c. HOME PHONE NO.: _____ d. BUSINESS PHONE NO.: (714) 741-5600

e. OCCUPATION: Firefighter f. DATE OF BIRTH: _____

g. SOCIAL SEC. NO.: _____ h. DRIVER'S LIC. NO.: _____

2. Name, address to which claimant desires notices to be sent, and telephone number, if other than above:

Katrina Foley; The Foley Group, PLC; 11600 Dove St, Ste. 101
Newport Beach, CA 92660

3. Occurrence or event from which claim arises:

a. DATE: 8/31/15 b. TIME: _____ c. PLACE (exact and specific location): 11301 Acacia Pkwy., Garden Grove, CA 92840

d. HOW, AND UNDER WHAT CIRCUMSTANCES, DID DAMAGE OR INJURY OCCUR? SPECIFY THE PARTICULAR OCCURRENCE, EVENT, ACT, OR OMISSION YOU CLAIM CAUSED THE INJURY OR DAMAGE. (USE ADDITIONAL PAPER IF NECESSARY.)
See Attachment 1.

e. WHAT PARTICULAR ACTION BY THE CITY, OR ITS EMPLOYEES, CAUSED THE ALLEGED DAMAGE OR INJURY?
See Attachment 1.

4. GIVE A DESCRIPTION OF THE INJURY, PROPERTY DAMAGE, OR LOSS, SO FAR AS IS KNOWN AT THE TIME OF THIS CLAIM. IF THERE WERE NO INJURIES, STATE "NO INJURIES": _____

harassment, emotional distress, defamation, invasion of privacy

5. GIVE THE NAME(S) OF THE CITY EMPLOYEE(S) CAUSING THE DAMAGE OR INJURY: _____

See Attachment 1

6. NAME(S) AND ADDRESS(ES) OF ANY OTHER PERSON(S) INJURED: _____

7. NAME AND ADDRESS OF THE OWNER OF ANY DAMAGED PROPERTY: _____

N/A

8. DAMAGES CLAIMED: See Attachment 1

a. BASIS FOR COMPUTATION OF AMOUNT CLAIMED (INCLUDE COPIES OF ALL BILLS, INVOICES, ESTIMATES, ETC.)

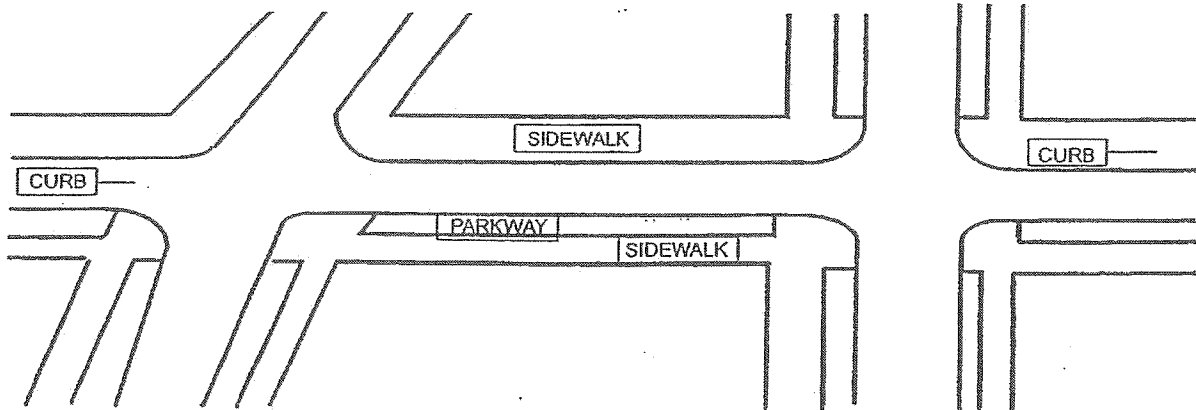
See Attachment 1.

9. ANY ADDITIONAL INFORMATION THAT MIGHT BE HELPFUL IN CONSIDERING CLAIM: _____

See Attachment 1.

READ CAREFULLY

For all accident claims, place on following diagram names of streets, including North, East, South, and West; indicate place of accident by "X" and by showing house numbers or distances to street corners. If City Vehicle was involved, designate by letter "A" location of City Vehicle when you first saw it, and by "B" location of yourself or your vehicle when you first saw City Vehicle; location of City Vehicle at time of accident by "A-1" and location of yourself or your vehicle at the time of the accident by "B-1" and the point of impact by "X". NOTE: If diagrams below do not fit the situation, attach hereto a proper diagram signed by claimant.



WARNING: IT IS A CRIMINAL OFFENSE TO FILE A FALSE CLAIM! (PENAL CODE SEC. 72)

I certify under penalty of perjury that the foregoing is TRUE and CORRECT.

2-29-16

DATE

Jeremy Rodriguez

CLAIMANT'S SIGNATURE



the
foley
group

A Professional Law Corporation

Katrina Anne Foley

Nida Lohuddin Henderson

RECEIVED
CITY OF GARDEN GROVE
CITY CLERK'S OFFICE
katrina@ocfoleylaw.com
nida@ocfoleylaw.com
2016 FEB 29 PM 4:52

15/16 3631

February 29, 2016

SENT VIA PERSONAL DELIVERY:

City of Garden Grove
City Clerk's Office
11222 Acacia Parkway
P.O. Box 3070
Garden Grove, CA 92842-3070

Re: Attachment 1 to Jeremy Broadwater's Claim for Damages to Persons or Property

ATTACHMENT 1

3d. HOW, AND UNDER WHAT CIRCUMSTANCES, DID DAMAGE OR INJURY OCCUR? SPECIFY THE PARTICULAR OCCURRENCE, EVENT, ACT, OR OMISSION YOU CLAIM CAUSED THE INJURY OR DAMAGE.

Jeremy Broadwater ("Mr. Broadwater") was retaliated, discriminated, harassed, and his privacy invaded based on political association, religion, and his complaints of wrongful conduct. Mr. Broadwater began working for the City of Garden Grove ("Garden Grove" or "City") in 2007 in the Community Services Department. After six years as a City employee and after completing firefighter training and graduating second in his class, in 2013, Mr. Broadwater applied for a position as a Firefighter with the City and was given the job. At the time, Mr. Broadwater's father, Bruce Broadwater, was the Mayor of Garden Grove. Bruce Broadwater was opposed by numerous agents of the City. Even before Mr. Broadwater was able to begin his employment as a Firefighter with the City, the City, through its employee agents, disseminated false information to the media and general public, falsely stating that Mr. Broadwater was unqualified, that he had a criminal record, and that he was only hired because of his father's role with the City. Then, when his employment as a Firefighter began, the City, through its employee agents, subjected Mr. Broadwater to constant harassment, group intimidation, hazing, retaliation, threats, unequal working conditions, unequal expectations, and municipal policy violations. Mr. Broadwater complained about the harassment and retaliation on a number of occasions. As a result of his complaints, he was retaliated against in the form of a demotion and removal from his position as a Firefighter and placement in an office job instead, causing him to lose career experience, promotion opportunities, and the ability to accrue overtime hours. In 2014, a City investigation revealed that Mr. Broadwater was being treated differently than other employees. Despite these results, the City continued to issue Mr. Broadwater harassing reprimands and conference memos, falsely accusing him of making

1600 Dove Street, Suite 101 • Newport Beach California 92660

Tel 949.502.8800 Fax 949.502.8801

professional mistakes, insubordinate conduct, and/or unnecessarily criticizing him on items where others were not treated so harshly. Mr. Broadwater continued to complain and grieve the reprimands. However, the retaliation, harassment, and hostile work environment only increased, causing Mr. Broadwater to fear his coworkers and supervisors and experience physical and emotional distress. On July 21, 2015, Mr. Broadwater had to take a leave of absence due to health related issues stemming from the stress. While on his leave of absence, the City continues to harass and retaliate against him, threatening to take disciplinary action against him for fabricated mistakes and fabricated instances of insubordinate conduct, and causing media attention damaging to his career and professional reputation.

3e. WHAT PARTICULAR ACTION BY THE CITY, OR ITS EMPLOYEES, CAUSED THE ALLEGED DAMAGE OR INJURY?

The following actions by the City caused the damages and/or injuries: The City's dissemination of false and/or confidential personnel information to non-privileged employees of the City, the media, and the general public about Mr. Broadwater, the City's constant harassment, group intimidation, hazing, retaliation, threats, unequal working conditions, unequal expectations, municipal policy violations, demotion of Mr. Broadwater, and its continued issuance of reprimands, conference memos, and threats of disciplinary action against Mr. Broadwater. The threats and retaliation continued while Mr. Broadwater was on a medical leave of absence.

5. GIVE THE NAME(S) OF THE CITY EMPLOYEE(S) CAUSING THE DAMAGE OR INJURY.

Various employees of the City of Garden Grove.

8. DAMAGES CLAIMED: More than \$1 million.

a. BASIS FOR COMPUTATION OF AMOUNT CLAIMED.

More than \$1 million based on lost wages and benefits, loss of career opportunities, costs of retraining, emotional and physical distress to Mr. Broadwater and his family, humiliation and embarrassment, and lost benefits and pension contributions in an amount to be determined by expert calculation and uncertain at this time.

9. ANY ADDITIONAL INFORMATION THAT MIGHT BE HELPFUL IN CONSIDERING CLAIM.


First and foremost, Mr. Broadwater requests that the harassment, hostile work environment, defamation, invasion of privacy, and retaliation stop. He also requests that his personnel record be completely sealed and available only for himself and other authorized individuals to view. He also requests a neutral letter of recommendation and a severance exit package so that he may move on and start his career over.

City of Garden Grove
City Clerk's Office
February 29, 2016
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Thank you for your attention to this matter. While Mr. Broadwater is amenable to informal resolution, he is ready to move forward with the filing and service of his complaint. Your earliest attention to this matter is greatly appreciated. Please call us if you have any questions or comments.

Sincerely,

THE FOLEY GROUP, PLC

A handwritten signature in black ink that reads "Nida L. Henderson". The signature is written in a cursive style with a large initial "N".

Nida L. Henderson
Attorney at Law

NLH:kgb