

BENT CARYL & KROLL ^{LLP}
ATTORNEYS AT LAW

6300 WILSHIRE BOULEVARD, SUITE 1415, LOS ANGELES, CALIFORNIA 90048
TEL (323) 315-0510 FAX (323) 774-6021
www.bcklegal.com

SERGIO BENT
(323) 315-0512
sbent@bcklegal.com

September 22, 2023

SETTLEMENT DISCUSSIONS SUBJECT TO EVIDENCE CODE §§ 1152/1154

VIA EMAIL ONLY

scarvalho@santa-ana.org

Sonia R. Carvalho
City Attorney
City of Santa Ana
20 Civic Center Plaza
Santa Ana, CA 92701

Re: Kristine Ridge

Dear Ms. Carvalho:

This is to advise you that our office represents Kristine Ridge.

As you know, Ms. Ridge has thirty-four years of exemplary government experience with twenty-nine years at the municipal level. She is one of the most senior City Managers serving a municipality in the County of Orange. Her extensive background includes all facets of municipal government. For example, Ms. Ridge has served as an Internal Audit Manager, City Treasurer, Human Resources Director, Finance Director, Deputy City Manager and Assistant City Manager for the tenth largest city in the State. Immediately preceding her employment with the City of Santa Ana, Ms. Ridge served as the City Manager for the City of Laguna Niguel. Throughout her years of public service, Ms. Ridge has never been subjected to the discrimination, harassment and retaliation to which she has been subjected at the City of Santa Ana. Moreover, Ms. Ridge had never been pressured by her prior employers to take actions that are contrary to law.

As you know based on Ms. Ridge's prior complaints, she has been subjected to discrimination, harassment, retaliation and pressured to take illegal action. To name a few:

- Ms. Ridge for over two years has endured repeated pressure from specific elected officials contrary to State law to take care of Police Union President, Gerry Serrano's pension, although CalPers and not Ms. Ridge is responsible for determining Mr. Serrano's pension. Ms. Ridge has also been repeatedly directed to provide Mr. Serrano with a higher paying salaried position without regard to civil service provisions nor qualifications. Ms. Ridge has been very vocal in her opposition to these demands, and has spoken out repeatedly about her concerns of misuse of taxpayer's dollars provided to the Police Officer's Association.

- During the labor negotiations for the Police Officer's Association, Ms. Ridge [REDACTED] [REDACTED] While these negotiations were taking place, Valerie Amezcua was elected as the new Mayor. Mayor Amezcua received substantial campaign support from the Police Officers Association ("POA") and immediately began creating a hostile work environment for Ms. Ridge. For example, Mayor Amezcua made discriminatory remarks regarding Ms. Ridge's gender and ethnicity such as commenting that Ms. Ridge was not able to perform some of her responsibilities as she did not "speak the language" signifying Mayor Amezcua's belief that a Caucasian such as Ms. Ridge is unable to perform the duties of the City Manager based on her race.
- Since being elected, Mayor Amezcua has repeatedly demanded that Ms. Ridge [REDACTED] [REDACTED] For example, Mayor Amezcua first wanted [REDACTED] because he was not nice when she showed up unannounced to his office with Mr. Serrano prior to being sworn in as the Mayor. Ms. Ridge has refused Mayor Amezcua's illegal demands to [REDACTED]. As a result, Ms. Ridge has been subjected to retaliation.
- Mayor Amezcua requested Ms. Ridge to place a closed session item to discuss [REDACTED] [REDACTED] When Ms. Ridge explained why the request was in violation of the Brown Act, Mayor Amezcua replied, "Well I know who I can schedule in closed session," which was a direct threat to Ms. Ridge's employment. Several weeks later, Mayor Amezcua put [REDACTED] [REDACTED] in the closed session meeting without informing [REDACTED] in advance.
- During POA labor discussions and deliberations, Mayor Amezcua prohibited Ms. Ridge from speaking or answering questions about the recommended provisions although Ms. Ridge's position in accordance with the City Charter provides her the right to participate in deliberations.
- Mayor Amezcua has also made derogatory race-based comments to Ms. Ridge such as, "You don't understand my community and culture" because Ms. Ridge is Caucasian. Moreover, Mayor Amezcua has stated to Ms. Ridge that employees should look like the community and speak Spanish. In one business meeting Mayor Amezcua spoke in Spanish and then laughed saying to Ms. Ridge "Oh you don't know what we are talking about."

Please understand that this is not remotely an exhaustive list of the misconduct to which Ms. Ridge is being subjected but I wanted you to understand the gravity of the misconduct to which Ms. Ridge is being subjected.

Ms. Ridge had expected to retire from the City but the working conditions have become so intolerable that they are affecting her physical and mental health. Although Ms. Ridge is ready to proceed with litigation, if necessary, I am writing to determine whether the City has an interest in attempting to resolve Ms. Ridge's claims without the need for lengthy and costly litigation.

September 22, 2023

Page 3

Please let me know by the close of business on October 4, 2023 whether the City is agreeable to pre-litigation mediation or an informal settlement discussion between counsel. I look forward to your response.

Lastly, we request that the City preserve Ms. Ridge's emails, computer hard drive, and all documents pertaining to Ms. Ridge's employment. We also request that the City preserve Mr. Serrano and Mayor Amezcua's emails, computer hard drives, and City cellular phone information and text messages.

BENT CARYL & KROLL, LLP



SERGIO BENT

SB/cm