

LAW OFFICES
GIBBS & HOLMES
171 CHURCH STREET, SUITE 110
POST OFFICE BOX 938
CHARLESTON, SOUTH CAROLINA 29402-0938

ALLAN R. HOLMES
PARTNER
CERTIFIED SPECIALIST IN LABOR
AND EMPLOYMENT LAW

January 9, 2018

TELEPHONE (843) 722-0033
TELECOPIER (843) 722-0114
E-MAIL
aholmes@gibbs-holmes.com

VIA EMAIL ONLY [hraskin@postandcourier.com]

Ms. Hanna Raskin
Post and Courier

Dear Ms. Raskin.

We serve as employment counsel to Patrick Properties Hospitality Group. Randall Goldman advised our client of your communication with him, and I have been forwarded your email with its list of questions.

Celeste Patrick, Charles Patrick, and their adult children are the owners and proprietors of Patrick Properties. They have been associated with Mr. Goldman for over 20 years. In that 20 years, there has never been any suggestion from anyone that Mr. Goldman has engaged in any unwelcome or harassing conduct. Since receiving your email, Mr. Goldman has assured us that he has not engaged in any unwelcome or harassing conduct. However, any complaint against Mr. Goldman or any other employee of Patrick Properties would be investigated thoroughly and impartially in accordance with our client's anti-harassment policy.

Patrick Properties has a comprehensive, detailed anti-harassment policy which prohibits "harassment of one employee by another employee, supervisor or third party for any reason based upon an individual's race; color; religion; genetic information; national origin; sex (including same sex); pregnancy, childbirth, or related medical conditions; age; disability; or any other category protected under federal, state, or local law." Patrick Properties "absolutely prohibits retaliation" for reporting a possible violation of this policy, or participating in an investigation conducted under this policy. Each employee is provided the anti-harassment policy in writing.

Each employee is specifically advised that:

"If you have any concern that our No Harassment policy may have been violated by anyone, you must immediately report the matter."

"You should report any actions that you believe may violate our policy no matter how slight the actions may seem."

Each employee is assured – in writing - that each report will be investigated and that Patrick Properties will then take prompt, appropriate remedial action.

In short, Patrick Properties is fully committed to a workplace completely free of unwelcome or harassing conduct..

I am attaching a copy of the Patrick Properties anti-harassment policy, and encourage you to compare it with those promulgated by any other employer.

I am also attaching a copy of a document, “Patrick Properties Team”, which is provided to every employee upon hire. You will note it plainly identifies Charles, Celeste, and their adult children as owners and proprietors of Patrick Properties.

Given all of the foregoing, we are at a loss to understand why anyone with “serious and substantiated” charges has never made a complaint to *anyone* with Patrick Properties.

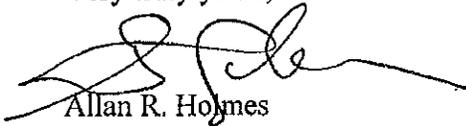
That said, our client is intent on assuring that its employees work in a safe and non-discriminatory workplace, and our client will accept any and all complaints of harassment and make sure that they are fully and fairly investigated – regardless of the fact that such complaints have not been previously reported. If the charges are founded, appropriate remedial action will be taken.

However, our client does not intend to address anonymous charges for which no one is willing to accept responsibility, and we certainly have no intention of addressing these potentially defamatory charges in a newspaper column. The policy of your newspaper wouldn't allow their anonymous publication in a letter to the Editor. It seems inconsistent with responsible journalism to require us to address them without identifying their source(s), or providing significant detail. Before you publish vague anonymous complaints and thereby sully the reputation of our client's business, we would appreciate your consulting with your editors. Even the witches of Salem were given notice of charges and a hearing.

We encourage you to cause any complainants to address their complaints directly to our client so that we can investigate them. I will be happy to accept the complaints on behalf of our client.

With kind regards, I am

Very truly yours,



Allan R. Holmes

Enclosures as stated

Mr. Charles and Dr. Celeste Patrick