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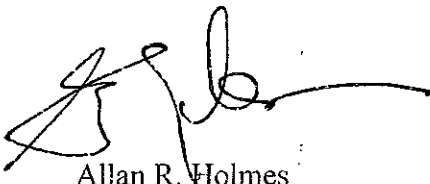
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February 22, 2018

I represent Celeste and Charles Patrick, and Patrick Properties. This statement is provided on behalf of my clients. Attached is an email sent to Hanna Raskin yesterday afternoon before she published her piece. As stated in my email, we are committed to a workplace free from unlawful harassment. We have long maintained an aggressive written anti-harassment policy, and I have personally spent considerable time encouraging current and former employees to come forward and complain directly to me about any and all misconduct. Despite all this, the total number of complaints about Randall Goldman from present and former employees remains the same as it did at 5 p.m. yesterday afternoon: zero.

In addition to our commitment to providing our employees with a safe workplace, we are equally committed to not taking any action based upon reports of "anonymous sources" who attempt to destroy the reputations and careers of those who work for us. Randall and Jennifer Goldman are also our employees, and – like the rest of our employees – they are entitled to fair treatment. No one can be fairly judged on the basis of anonymous complaints – complaints which include wildly defamatory "guerilla mails" - a cowardly type of email which exists purely for the purpose of hiding the identity of its sender. We find it incredible that unnamed, former employees would be unwilling to affix their names to any legitimate complaints about their former employer. What would they have to lose?

Finally, it may be worth noting that neither we nor the law of the workplace require managers who are "mind readers". Rather, it is anticipated that our employees – all of whom are adults – will express themselves if they feel their space has been invaded, or they prefer a handshake to a more gregarious hug.



Allan R. Holmes

Allan Holmes

From: Allan Holmes
Sent: Wednesday, February 21, 2018 5:32 PM
To: 'Raskin, Hanna'
Subject: RE: From the Post & Courier

Dear Hanna.

Thank you for your email. In my letter to you of January 9, I noted that in addition to maintaining a strong, well publicized, written policy against harassment, and despite the fact that no complaint has ever been made against Randall Goldman, our client Patrick Properties:

... 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 ...

* * *

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.

Since January 9, we have not received a single complaint from any current or former employee of Patrick Properties even though we have gone to extraordinary lengths to solicit such complaints. We've even gone so far as to ask you -- a journalist -- to encourage complainants to come forward. We would welcome the opportunity to investigate and address the anonymous complaint you provided in your email today, but it's not only anonymous, it lacks all *other* detail. We're not even being provided the five "journalistic Ws": who, what, when, where, and why. Is there some reason this former employee would be unwilling to come forward and provide us with sufficient detail so as to allow an investigation? Unlawful harassment is serious business. Claims of unlawful harassment are also serious business. We take it seriously. Please ask your complainant to communicate with me directly, and we'll make sure that it's addressed appropriately.

Best regards. Allan

From: Raskin, Hanna [mailto:hraskin@postandcourier.com]
Sent: Wednesday, February 21, 2018 4:04 PM
To: Allan Holmes <aholmes@gibbs-holmes.com>
Subject: From the Post & Courier

Allan, tried to reach you by phone, but thought this might be a better way:

As you know, I'm working on a story about Randall Goldman. There is one allegation against him that could potentially reflect on the company, and by extension, the Patricks, so wanted to give you every opportunity to respond to it: A former employee claims she was discouraged by Goldman's assistant, who at the time ran HR, from reporting an incident involving unwanted touch.

Please let me know if you would like to comment. Otherwise, I have your letter. Thanks!

Hanna Raskin
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