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July 24, 2020

Via Email (borwick@stlouisco.com)

Beth Orwick, Esq.
St. Louis County Counselor
41 South Central Avenue
St. Louis, MO 63105

Re: Col. Troy Doyle

Dear Ms. Orwick:

I am in receipt of your letter dated July 22, 2020 purporting to summarize our meeting of July 8, 2020 and advising that St. Louis County has rejected our good faith efforts to resolve this matter before filing administrative charges on behalf of Col. Troy Doyle. Unfortunately, your letter misrepresented or omitted much of the substance of our discussion.

We presented the County with a good faith offer to resolve this matter. In characterizing our demand as “extortion,” you failed to mention that during our meeting, I detailed each element of damages supporting the amount of our demand, including lost wages (based on the salary differential between Chief and Colonel), lost pension benefits over the course of Col. Doyle’s life (an amount that will likely be close to \$1 million dollars), lost future earning capacity, emotional distress, punitive damages, and attorneys’ fees. Moreover, contrary to the suggestion that the settlement proposal was non-negotiable, I stated that we had room to move with respect to our settlement demand. Your representation that I “demanded that the money be paid within 16 days” is patently false. We also discussed that any settlement would be subject to disclosure pursuant to Missouri’s Sunshine Act.

As I discussed in our meeting, we believe that Col. Doyle has a strong case of race discrimination and are confident that we can demonstrate that race was a motivating factor in the decision not to select him as Police Chief. We will be able to show substantial evidence that Col. Doyle was a far more qualified candidate to be Chief than then-Captain Mary Barton. We will also have direct evidence that opposition to Col. Doyle’s promotion to Chief was based upon his race.

You also incorrectly claim that I “made no factual allegation of how Dr. Page did or could have controlled a Board made up of five independent commissioners.” As I stated in our meeting, Dr. Page has repeatedly emphasized that the Police Board does what he tells them to

do. It seems entirely reasonable to take Dr. Page at his word on that point, especially since he recently selected four of the five current Commissioners.

Col. Doyle believes that his race was a motivating factor in the decision to deny him the promotion to Police Chief and he intends to exercise his legal rights to obtain justice. To suggest as you do in your letter that Col. Doyle's assertion of his rights constitutes an improper "interference with an election" is wholly improper and frankly evidences disdain for the democratic process. Whether the selection of the Police Chief was driven by racial considerations is unquestionably a matter of public interest and public importance, particularly given the tremendous focus on police reform and the unfortunate long-standing and ongoing racial issues relating to the County Police Department's treatment of its African-American citizens and employees.

It is disappointing that our efforts to negotiate an early resolution of this matter have been rejected and our presentation of Col. Doyle's claim so distorted. In our meeting I stated several times that we believe this is a very important case which we would like to litigate and about which the public has a right to know. In light of the County's rejection of our efforts to negotiate, we will proceed accordingly.

Yours very truly,



Jerome J. Dobson

JJD/rlt