



October 19, 2023

**PRIVILEGED AND CONFIDENTIAL COMMUNICATIONS
FOR PURPOSES OF SETTLEMENT NEGOTIATIONS ONLY**

Sent Via Email:

Keisha Hicks
Gary Johnson
City of Jennings, Missouri
2120 Hord Avenue
City of Jennings, Missouri 63136
deputycityclerk@cityofjennings.org
mayorjohnson@cityofjennings.org

Mike McCray- MOPERM Claims Manager
Claims@moperm.com

Re: Sam Alton v. City of Jennings

Dear Mayor Johnson and Deputy Clerk Hicks:

Please be advised, the undersigned represent Sam Alton in his constructive discharge and discrimination action against the City of Jennings, Missouri (“Jennings”) as a result of the unlawful and unethical acts of Mayor Johnson. Our client has authorized us to make the following demand to resolve all issues between the parties and avoid further litigation.

The salary for the city attorney is \$70,380.00. Mr. Alton’s demand is \$281,520.00. This settlement demand represents what our client would have been paid during your four-year term had you not illegally tried to terminate his employment and caused his constructive discharge. Please be aware that Mr. Alton is incurring attorneys’ fees in the pending action. We know the City is incurring fees as well. Settlement will allow both sides to move on, avoid extensive discovery and allow Mr. Alton to recover his actual losses as a result of the City’s illegal and unfounded actions. If we are forced to file suit we will seek additional damages including, but not limited to, punitive damages for your discriminatory and retaliatory conduct and the city’s repeated and willful violations of the Sunshine Law, and our fees to enforce Mr. Alton’s legal rights in a court of law.

Lastly, we note that you have failed to respond to our spoliation/preservation letter regarding the spoliation of evidence. Again, we demand that you preserve any and all written and electronic evidence or other similar material including, but not limited to all text messages, emails and employment documentation, relating to Sam Alton and his employment at the City Of Jennings as City Prosecutor and City Attorney.

You have ten (10) business days to respond to this demand. We have included your MOPERM representative on this demand for the sake of the Jennings and your other council members. Thank you for your consideration.

Very truly yours,



Steven Edelman