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July 27, 2020

VIA E-MAIL – SHERRI.GREENBERG@CENTRALHEALTH.NET Sherri Greenberg Chair, Board of Managers Central Health 1111 East Cesar Chavez St. Austin, TX 78702

Re: Larimen Wallace

Dear Ms. Greenberg:

I represent Larimen Wallace concerning an employment dispute with Central Health and related parties. The purpose of this letter is to notify you of Mr. Wallace's complaint and to propose a fair resolution. After investigating this matter, it is clear that Central Health wrongfully terminated Mr. Wallace in violation of 42 U.S.C. § 1981, the Civil Rights Act of 1964, and the Texas Labor Code.

Mr. Wallace, who is African American, first began working for Central Health in September 2005. For the duration of his employment, Mr. Wallace always gave his best efforts, had no disciplinary history, and had every intention of working for Central Health until his retirement.

In September 2019, Mr. Wallace attended the Equity Space Conference where he received an award. After Mr. Wallace received the award, he returned to his table where a board member asked to take a selfie with him. Mr. Wallace obliged. Later, to Mr. Wallace's surprise, the CEO, Mike Geeslin, Caucasian, told Mr. Wallace that the board member alleged that he touched her inappropriately. There is no truth to this allegation. However, Central Health told Mr. Wallace that he had to either quit or be terminated.

This action against Mr. Wallace is pretext for discrimination and retaliation. In fact, Mr. Geeslin had long sought to terminate Mr. Wallace. The real reason for terminating Mr. Wallace was unlawful race discrimination and retaliation.

In an effort to resolve this matter, Mr. Wallace offers to waive any and all claims he may have against Central Health in exchange for a severance of 2 years

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wages and benefits. Such a severance would include standard terms such as confidentiality, no admission of fault, mutual non-disparagement, no rehire/reapplication, and taxation.

Please give this matter your immediate attention. I will refrain from filing a charge of discrimination with the EEOC until Friday, August 7, 2020 to allow you time to investigate Mr. Wallace's claims and to consider his offer of settlement. In the meantime, do not hesitate to contact me if you have any questions.

Sincerely yours, WILEY WALSH, P.C.

/s/ Colin Walsh

By: Colin W. Walsh 512.271.5527 colin@wileywalsh.com

CC: Client File