

**INITIAL DECISION**

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JIM STURGEON,

Complainant,

vs.

DEPARTMENT OF CORRECTIONS,

Respondent.

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This matter came on for hearing on November 7 and December 14, 2001 before Administrative Law Judge Mary S. McClatchey. Jim Sturgeon ("Complainant") was represented by Michael L. Garcia, Esquire. Respondent Department of Corrections ("DOC") was represented by Assistant Attorney General Melissa Mequi.

**MATTER APPEALED**

Complainant, a Correctional Officer III at DOC, appeals the denial of his grievance. His grievance challenges an August 2000 Corrective Action as being unwarranted and repetitive. It also alleges that the Corrective Action was the result of an unauthorized investigation by a union official, as well as retaliation and harassment by his former supervisor.

Because the August 2000 Corrective Action corrects Complainant for the exact same conduct as that addressed in the March 2000 Corrective Action, it is violative of Board Rule R-6-5 and is rescinded. All other issues raised in Complainant's grievance are found to be baseless.

**ISSUES**

1. Whether the action of Respondent was arbitrary, capricious, or contrary to rule or law.

**FINDINGS OF FACT**

1. Complainant commenced employment at DOC in January 1993.

2. At all times relevant, Complainant has been a Correctional Officer III, Lieutenant, stationed at Canyon Minimum Centers ("CMC"). In 1999, he was stationed in the Office of Security Services ("OSS"), also known as the External Security unit ("CES").
3. Major Watson was Complainant's immediate supervisor at External Security for the period of late 1998 through 2000.
4. Major Watson consistently gave Complainant very positive ratings on performance evaluations, until problems arose in late 1999.

#### Complaints from Staff Regarding Complainant's Supervision, December 1999

5. In late December 1999, employees dissatisfied with Complainant's management style and supervisory tactics approached their union representative, Lt. Reyes Martinez. The staff asked Martinez to bring their concerns to the appropriate authorities.
6. Among the employees' complaints were the following: Complainant counseled or admonished employees in front of co-workers; failed to put new post orders in place; gave conflicting or inconsistent orders; and was divisive and not entirely honest with staff.
7. When Complainant learned that Martinez was discussing staff's concerns with them, he felt this was an unauthorized investigation, conducted outside of official DOC regulations. He expressed this concern to Major Watson, but the Major informed Complainant that the union representative had the right to discuss employee issues with them.
8. Martinez ultimately presented the staff's concerns to the DOC Inspector General's ("IG") office in a letter in December 1999. The IG office commenced an official investigation.
9. Watson responded to the allegations by removing Complainant from his post at External Security, and reassigning him to the Visiting Center, pending the investigation. Watson also required that Complainant have no further contact with the patrol staff at External Security.
10. Watson's December 30, 1999 memo to Complainant stated in part,

"Jim, on 12-21-99, I made you aware of some allegations that were made against you, which may include work place harassment, at which time I offered you a copy of DOC Administrative Regulation 1450-05 Unlawful Employment Practices: Policy Prohibiting Workplace Discrimination/Harassment, which you refused. Since then there be around 7 or 8 staff that may want to make allegations also. [sic]

I have discussed these issues with our current appointing authority Mr. Ben Griego, and our future appointing authority Warden Neal, the decision was that I should take any necessary actions and prevent these incidents from affecting the performance of other OSS Staff and the OSS Mission.

Until these allegations are resolved, you are assigned to the DOC Visiting Center only. You will supervise the staff assigned to the visiting center only. Please adjust your days off so your work week occurs during scheduled visiting. My expectations are you will assist at all posts and if necessary work a post assignment.

Jim, in your best interest you are to discontinue any contact with patrol staff."

11. On December 31, 1999, Major Watson sent a memo to all OSS staff concerning the supervision change, informing them Complainant would take over supervision of the Visiting Center and Lt. Bardessona would take over supervision of all three OSS shifts [Complainant had shared this duty with Bardessona].
12. After receiving Watson's memos, Complainant felt he had been wronged. On January 1, 2000, he wrote a letter to the Inspector General's office (inaccurately dated January 1, 1999). The letter opens by stating that during the past year Complainant has been subjected to "what I feel now could best be described as a hostile work environment leaning toward workplace harassment . . . Attached are copies of two letters I received on December 30<sup>th</sup> and I feel that enough is enough." The two letters were Major Watson's December 30 and 31 memos referenced in Paragraphs 10 and 11 herein.
13. While it is clear that conflicts between Major Watson and Complainant had been ongoing since Watson's decision to bring Lt. Bardessona to the OSS unit, this letter on its face contains no evidence of hostile work environment or workplace harassment.
14. Among the contents of Complainant's four-page, single-spaced letter are the following:
  - Complainant discusses at length his opposition to Major Watson's decision to bring Lt. Bardessona onto the OSS unit. He describes going over the Major's head in an attempt to preempt his decision, and then openly "confronting" him about it in front of the Major's supervisor. He states Major Watson became upset with Complainant over his continued opposition to this decision;
  - Complainant avers that Major Watson had long intended to place Lt. Bardessona over External Security, and Complainant over the Visiting

Center. But he states Complainant offered a compromise, under which he and Bardessona would share supervision of OSS, Major Watson agreed to it.

- Complainant alleges that Major Watson allowed the union representative, Lt. Martinez, to conduct an investigation of workplace harassment against him, and that as a result of that investigation Major Watson reassigned Complainant to supervise the Visiting Center, enabling Lt. Bardessona to take over supervision of External Security. Complainant states that Martinez is a friend of Watson and Bardessona.
  - Complainant states that the attached letters "are based on allegations resulting from a union representative's unofficial investigation. I believe that because Major Watson allowed this investigation and accepted the resulting allegations to relieve me of my role as Day Shift Supervisor, he has found a way to accomplish his primary objective of getting rid of me and giving Lt. Bardessona External Security.
  - Complainant also states, "Major Watson has allowed subordinate staff become uncontrollable, unprofessional, and disrespectful toward me, without resolving the situation . . . ."
  - Complainant's memo relates a number of instances where Lt. Bardessona modified policies without notice to either Complainant or Major Watson, and that Major Watson never held Bardessona accountable for it. He intimates that Major Watson showed favoritism towards Bardessona, at his expense.
15. Complainant's January 1, 2000 letter was sent to the same IG investigator that was assigned to investigate the allegations of workplace harassment against Complainant. The investigator reviewed the letter and determined that its allegation of harassment was unsupported.

March 2000 Needs Improvement Evaluation.

16. During the pendency of that investigation, the time for Complainant's annual performance evaluation arrived. On March 27, 2000, Major Watson rated Complainant an overall Needs Improvement for the period April 1999 through March 2000. This evaluation encompassed and addressed the staff's complaints regarding Complainant's management and supervision style that had led Major Watson to his removal from OSS in December 1999, and that were the subject of the ongoing IG investigation.
17. In the "Communication" section, the evaluation stated,
- "Lt. Sturgeon is a master of deception in this area. He has the ability to know and

then tell you what you want to hear or know. But to staff he demonstrates a different technique, which is one that puts staff in a defensive mode. But after their reaction, he again switches to 'ok I will help you out and talk to the Major' mode in order to make himself look good to the staff. I believe staff finally saw through this screen he was displaying. In this factor a rating of Needs Improvement is awarded."

18. In the "Interpersonal Relations" section, Major Watson stated,

"Lt. Sturgeon fails to meet the recognized standards listed for this section. The Lt. created a problem within the work unit which all started when our Appointing Authority . . . moved another CO III to our work unit, at which time Lt. Sturgeon voiced his displeasure and disagreement of having another CO III aboard in the unit. From that negative display, the morale and working conditions were affected. I must give this section a Needs Improvement rating."

#### March 2000 Corrective Action.

19. In March 2000, Respondent issued a Corrective Action ("CA") in connection with the March 2000 Needs Improvement evaluation.

20. The March 2000 CA directly addresses the management and supervision issues raised by staff that were being investigated by the IG's office. It stated in part as follows:

**"Communication.** You must develop the skills needed to communicate with staff. 1. Attend a Interpersonal Communication Skills class. . . be straight and forward with all discussions and when communicating with others. **Interpersonal Relations:** You must change some of your past behavior as pointed out in your evaluation. I will stress that you need to work on tact and being responsive to your staff, never forgetting to be sensitive to some of their personal needs. 1. Demonstrate to your current supervisor the abilities needed to create a pleasant working atmosphere in your unit. 2. Develop a plan with your current supervisor to plan a project that promotes morale in your working unit. 3. Discuss with your current supervisor about staff motivation and what you can do. **Organizational Commitment:** you need to work on your beliefs and attitudes concerning personal feelings and organizational changes. You have a lot to offer DOC. . . 1. Demonstrate to your current supervisor a positive attitude toward your job assignment and the work unit you are assigned to. . . ."

21. The CA mandated that Complainant complete the corrective actions by the following dates, "A time of forty-five (45) days given for you to bring all five (5) evaluation factors up to the Competent level. In the areas that require attending classes, the 45 days will be waived to the first available class."

#### IG Investigative Report

22. After that evaluation period was over, in the Spring of 2000, the Inspector General office completed its investigation.

23. The IG report concluded that the complaints made against Complainant were justified -- that Complainant had chastised his subordinates in front of co-workers, had given inconsistent direction, had caused conflict and divisiveness between himself and staff, and had been perceived as not always being entirely truthful.
24. While the report was not introduced as evidence at hearing, the investigator testified credibly that he had interviewed all witnesses referred to him, and that the majority of those seventeen individuals corroborated each other's statements without having had the opportunity to compare notes. Some individuals interviewed had positive things to say about Complainant.
25. Most troubling to the IG investigator was Complainant's inability to explain or defend himself against the allegations. The investigator found him to lack credibility because of the evasiveness and incompleteness of his answers.
26. Complainant denies having engaged in any of the actions alleged in the report. He claims that he kept Major Watson apprised of his actions as supervisor, and that Major Watson never gave him any warning of performance problems. Major Watson countered this testimony, stating that he did verbally counsel Complainant on occasion.
27. It is found that Complainant engaged in the actions as concluded in the IG report, outlined in Paragraph 23 above. This is based on the following: the IG investigator conducted an unbiased investigation in which he found that the majority of witnesses confirmed Complainant's managerial and supervision problems; and, Complainant offered no independent evidence corroborating his denial either to the IG investigator or at hearing.

#### August 2000 Corrective Action

28. After reviewing the investigative report, Warden Neal scheduled a pre-disciplinary meeting with Complainant. Complainant appeared with counsel, and addressed some issues he felt the IG investigator should have addressed, but had not.
29. Complainant informed Neal that he had issued counseling letters to some of the individuals that had made complaints against him. She took this into account in determining what action to take.
30. On August 9, 2000, Warden Neal issued a second Corrective Action in response to Complainant's conduct in 1999, for which he had already received a Corrective Action in March 2000. The August 2000 Corrective Action stated in part,

"During the time the investigation was being conducted, [reorganizations occurred which] moved you to a different post. In effect this move made the specific issues of the investigation moot.

"Your current work supervisor, Mary Claar, is satisfied with your work performance. You are not currently experiencing difficulty in this post assignment. . .

Although I do not think information contained in the investigation warrants disciplinary action, the information I received does raise concern. Specifically, I find it troubling 16 of your co-workers complained you created a hostile work environment. This suggests that at the least you were not in step with your coworkers and there is a need to further develop interpersonal skills. I am, therefore, imposing the following corrective action. This corrective action is being issued primarily to correct and improve your work performance. By March, 2001, you are to satisfactorily complete supervisory training."

31. Complainant timely grieved the August 2000 Corrective Action. In his Statement of Grievance, he states the issues as follows:

- "Unwarranted 6-10 hearing by Warden Donice Neal and Major Charlie Watson, based on unsubstantiated hostile work environment/workplace harassment claims against me."
- "Resulting corrective action by Warden Donice Neal."
- "Improper and biased investigation of which I was not provided an opportunity to fully understand the specific allegations nor told what I was accused of until the 6-10 meeting, and then only provided general topics of some of the complaints"
- "I was subjected to a hostile, harassing environment while assigned to OSS under the management of Major Charlie Watson"
- "This is . . . a repetitive corrective action (against AR) that was considered satisfied by Capt Claar's close out PEP, March 31, 2000"
- "This [is] harassment and retaliation." Regarding the harassment and retaliation claim, Complainant states, "I have found no AR that directs staff to contact a union representative and that the union conduct the investigation. All staff were not members of the AFSME union, although the AFSME president was allowed to conduct a 'witch hunt' for the purpose of intimidation and harassment against me."

32. DOC Deputy Director of Prison Operations Gerald M. Gasko appointed a grievance panel to investigate and respond to Complainant's grievance.

33. The grievance panel submitted its findings and recommendation to Gasko, who then interviewed the IG investigator and Warden Neal.
34. On November 13, 2000, Gasko sent Complainant a letter, in which he concurred with the panel's findings and recommendations, which were: the August 2000 Corrective Action was not harassing or retaliatory and was an appropriate way to address interpersonal issues; there was no evidence to support his claims of retaliation, discrimination [based on military background], or harassment; an objective investigation was conducted by the Inspector General's office; and he was encouraged to maintain open lines of communication with his superiors and subordinates.
35. Gasko failed to address Complainant's claim that the August 2000 Corrective Action was repetitive, in violation of administrative regulation.
36. The March 2000 and August 2000 Corrective Actions did encompass the exact same conduct: allegations by staff that Complainant publicly chastised them in front of co-workers; gave conflicting orders; failed to put new post orders in place; and caused friction and distrust between himself and staff.
37. Complainant was corrected twice for the same performance issue.
38. At hearing, Warden Donice Neal was asked if the conduct giving rise to both corrective actions was the same. She testified, "Yes, it's the same conduct. Essentially." She clarified that the March 2000 corrective action was based on additional issues from the Needs Improvement evaluation, that were not encompassed in the August 2000 corrective action.
39. Complainant had filed two grievances prior to the one at issue herein; one had challenged the March 2000 Needs Improvement evaluation and Corrective Action. Complainant alleges that Respondent retaliated against him for having filed the prior grievances when it issued the August 2000 Corrective Action.
40. Complainant requests that the Corrective Action be rescinded; that Respondent cease retaliatory, discriminatory, and harassing actions toward him; that an objective investigation be conducted into the motives of the complainants; and to restore his reputation within DOC.

## **DISCUSSION**

In this action challenging an agency response to a grievance, it is Complainant's burden to demonstrate that the Respondents' actions were arbitrary, capricious, or contrary to rule or law. Section 24-50-103(6), C.R.S. *Department of Institutions v. Kinchen*, 886 2001G020

P.2d 700 (Colo. 1994).

**I. Respondent's August 2000 Corrective Action Violated Board Rule R-6-5.**

State Personnel Board Rule R-6-5 states,

"An employee may only be corrected or disciplined once for a single incident but may be corrected or disciplined for each additional act of the same nature. Corrective and disciplinary actions can be issued concurrently." R-6-5, 4 CCR 801 (2000).

Complainant was corrected twice for the same behavior, in violation of R-6-5. In March 2000, he received a Corrective Action ("CA") in part for his managerial and supervisory deficiencies during the period April 1999 through January 2000, the time of his transfer to the Visiting Center. In August 2000, the IG investigation having been completed, he was corrected again for the exact same behavior during the exact same period of time. Warden Neal herself testified that he was corrected for the same behavior twice. She further stated in her August 2000 CA letter that the problem behavior at issue had become moot, since Complainant had long since stopped supervising the complaining employees, and was performing well in his current position.

At hearing, it was clear that Warden Neal was unaware that she had corrected Complainant twice for the same behavior, and had not given the issue much, if any, consideration. She made a good faith error in issuing the second CA, primarily because of the different contexts in which she issued them. In the first instance, Complainant had received a Needs Improvement evaluation for a number of issues, including the alleged problems with management and supervision. The March 2000 CA was issued as a routine follow-up on that evaluation. In the second instance, months later, Neal faced an investigative report in which allegations of supervisory problems had been verified through numerous witness interviews. As appointing authority, she understandably felt compelled to take responsible action in response to this report.

Nonetheless, the fact that the information for which Complainant was corrected twice was in two different forms, "alleged" versus "confirmed" conduct, does not change the fact that Respondent corrected him twice for the same conduct. Therefore, under Rule R-6-5, the August 2000 CA cannot stand.

**II. Respondent did not harass or retaliate against Complainant.**

Contrary to Complainant's assertions, Warden Neal had no hidden agenda of punishing Complainant for filing past grievances. The IG investigative report demonstrated that Complainant had significant problems in his role as supervisor at OSS. She felt obliged to correct those problems. She made a good faith error by neglecting to notice that Complainant had already been corrected for the same behavior as part of the CA following his Needs Improvement evaluation.

Complainant averred that Major Watson sought to have Complainant corrected in August 2000, in retaliation for Complainant's January 1, 2000 letter to the IG office alleging Major Watson had harassed him. At the time Warden Neal issued the August 2000 CA, Major Watson no longer supervised Complainant. Warden Neal was not influenced by Watson to issue the August 2000 CA against Complainant. Complainant failed to meet his burden of demonstrating any causal connection between the January 1 letter and his August 2000 CA.

Complainant introduced no evidence at hearing demonstrating that Major Watson created a hostile work environment or harassed him. Nor does Complainant's January 1, 2000 letter demonstrate this. It appears that Complainant has confused Major Watson's freedom to run his unit as he saw fit with an agenda to undermine Complainant.

The majority of Complainant's problems with Major Watson appear to have stemmed from his inappropriate challenging of the Major on his decision to bring Lt. Bardessona onto the OSS unit. Major Watson had complete discretion regarding how to manage his unit, including how to staff it. According to his own January 1 letter, Complainant went so far as to talk to the Major's supervisor about Bardessona. Watson's supervisor then said in front of the Major that he was not required to bring in Bardessona. Complainant then openly challenged Major Watson on the issue again, with this new ammunition.

Any person with common sense would understand that Major Watson would resent Complainant's defiantly open challenge to his authority. In view of Complainant's refusal to respect Major Watson's leadership, it is not at all surprising that the relationship between the two men deteriorated.<sup>1</sup>

Major Watson had a prior working relationship with Bardessona. The IG investigation revealed that one of staff's biggest problems with Complainant was his failure to put necessary administrative regulations in place. Apparently, Bardessona did this with dispatch, often failing to inform Complainant of his decisions, which was clearly unfair to Complainant. Major Watson refused to hold Bardessona accountable for this, which demonstrates favoritism on Watson's part and poor management. However, such favoritism and failure to demand communication between his feuding lieutenants does not amount to harassment or retaliation by Watson.

Watson's decision to remove Complainant as day shift supervisor of External Security was not retaliatory or harassing. Lt. Martinez, as union president, had been approached by a significant number of staff with the same type of complaints. While Complainant views Watson's acceptance of this "unauthorized investigation" by Martinez as harassing because it was contrary to administrative regulation, he provides no support for this allegation. Martinez was doing his job as union representative. Watson acted on the information he received in a reasonable manner.

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<sup>1</sup> Complainant defended his challenge of Major Watson on this issue on grounds it would impose more work on his staff. However, the reasons for his challenge to the Major's authority are irrelevant.

The fact that Watson had accommodated Complainant's request to share supervision of External Security with Bardesson also rebuts his harassment and retaliation charge. It was only once Watson received reports of Complainant's serious and widespread problems with supervision that Watson moved him to Visiting.

**III. Respondent did not permit an unauthorized investigation to be conducted against Complainant.**

Complainant provides no legal basis for his argument that Lt. Martinez' discussions with correctional officers unhappy with Complainant's treatment of them was in some way prohibited. In fact, neither party offered any DOC rule or administrative regulation that even addresses union activity during work hours. Lt. Martinez spoke with staff and then put their concerns in a letter to the IG's office for official investigation. This appears to have been appropriate. Complainant's assertion that Lt. Martinez's discussions with staff was unauthorized is found to be baseless.

**IV. The Office of the Inspector General conducted an unbiased investigation.**

The IG investigator testified convincingly that he understands the difficulties facing DOC managers such as Complainant, and that he took those challenges into consideration in conducting his investigation. As an employee of the IG's office, the investigator had no reporting relationship to Warden Neal or anyone factually involved in this case. He had no interest in the outcome. He was an unbiased investigator who conducted an unbiased investigation. The majority of the individuals he interviewed presented similar stories of the ways in which Complainant mistreated them as their supervisor. Complainant provided him with no new witnesses to interview, and with very little information to rebut the allegations of poor supervision.

Complainant's assertion that the investigator should have re-interviewed him after interviewing all other witnesses does have merit. Complainant should have been given the opportunity to rebut the detailed stories the investigator collected. It is far easier to rebut specific stories of misconduct than general allegations of misconduct. This shortcoming in the investigative process does not amount to a denial of due process, however, nor does it demonstrate bias. Complainant was interviewed fully, and was free to provide the investigator with additional information, and the names of additional witnesses to interview. He did not do. Further, Complainant testified that at the R-6-10 meeting, he clarified all issues with Warden Neal which he felt he should have cleared up with the investigator. Therefore, any purported lack of due process was cured at this stage of the process.

**CONCLUSIONS OF LAW**

1. The August 2000 Corrective Action violated Board Rule R-6-5, and therefore was contrary to rule. The remainder of issues raised in Complainant's grievance are found to be baseless.

### INITIAL DECISION

Respondent's August 2000 Corrective Action is rescinded. The Corrective Action is to be removed from Complainant's personnel file.

DATED this \_\_\_\_\_ day of  
February, 2002, at  
Denver, Colorado.

\_\_\_\_\_  
Mary S. McClatchey  
Administrative Law Judge  
1120 Lincoln Street, Suite 1400  
Denver, Colorado 80203

### NOTICE OF APPEAL RIGHTS

#### EACH PARTY HAS THE FOLLOWING RIGHTS

1. To abide by the decision of the Administrative Law Judge ("ALJ").
2. To appeal the decision of the ALJ to the State Personnel Board ("Board"). To appeal the decision of the ALJ, a party must file a designation of record with the Board within twenty (20) calendar days of the date the decision of the ALJ is mailed to the parties. Section 24-4-105(15), C.R.S. Additionally, a written notice of appeal must be filed with the State Personnel Board within thirty (30) calendar days after the decision of the ALJ is mailed to the parties. The notice of appeal must be received by the Board no later than the thirty (30) calendar day deadline. Vendetti v. University of Southern Colorado, 793 P.2d 657 (Colo. App. 1990); Sections 24-4-105(14) and (15), C.R.S.; Rule R-8-58, 4 Code of Colo. Reg. 801. If a written notice of appeal is not received by the Board within thirty calendar days of the mailing date of the decision of the ALJ, then the decision of the ALJ automatically becomes final. Vendetti v. University of Southern Colorado, 793 P.2d 657 (Colo. App. 1990).

### PETITION FOR RECONSIDERATION

A petition for reconsideration of the decision of the ALJ may be filed within 5 calendar days after receipt of the decision of the ALJ. The petition for reconsideration must allege an oversight or misapprehension by the ALJ. The filing of a petition for reconsideration does not extend the thirty calendar day deadline, described above, for filing a notice of appeal of the decision of the ALJ.

### RECORD ON APPEAL

The party appealing the decision of the ALJ must pay the cost to prepare the record on appeal. The fee to prepare the record on appeal is \$50.00 (exclusive of any transcription cost). Payment of the preparation fee may be made either by check or, in the case of a governmental entity, documentary proof that actual payment already has been made to the Board through COFRS.

Any party wishing to have a transcript made part of the record is responsible for having the transcript prepared. To be certified as part of the record, an original transcript must be prepared by a disinterested, recognized transcriber and filed with the Board within 45 days of the date of the designation of record. For additional information contact the State Personnel Board office at (303) 894-#2136.

#### BRIEFS ON APPEAL

The opening brief of the appellant must be filed with the Board and mailed to the appellee within twenty calendar days after the date the Certificate of Record of Hearing Proceedings is mailed to the parties by the Board. The answer brief of the appellee must be filed with the Board and mailed to the appellant within 10 calendar days after the appellee receives the appellant's opening brief. An original and 7 copies of each brief must be filed with the Board. A brief cannot exceed 10 pages in length unless the Board orders otherwise. Briefs must be double-spaced and on 8 2 inch by 11 inch paper only. Rule R-8-64, 4 CCR 801.

#### ORAL ARGUMENT ON APPEAL

A request for oral argument must be filed with the Board on or before the date a party's brief is due. Rule R-8-66, 4 CCR 801. Requests for oral argument are seldom granted.

#### CERTIFICATE OF MAILING

This is to certify that on the \_\_\_\_ day of February, 2002, I placed true copies of the foregoing **INITIAL DECISION** in the United States mail, postage prepaid, addressed as follows:

Michael L. Garcia, Esquire  
1123 North Elizabeth Street  
Pueblo, Colorado 81003

and in the interagency mail, addressed as follows:

Melissa Mequi  
Assistant Attorney General  
Employment Law Section  
1525 Sherman Street, Fifth Floor  
Denver, CO 80203

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