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Steve Furman  
Bauer & Furman, P.C.  
526 Meeker Street  
Fort Morgan, CO 80701

**Re: Washington County Department of Human Services – Investigation Report**

Dear Mr. Furman:

As you are aware, our law firm serves as County Attorney for Washington County, Colorado. This letter is sent to you in your capacity as legal counsel to the Washington County Department of Human Services (the “Department”). I understand you are representing the Department in a custody dispute known as the Thornton custody matter.

I want to inform you that an employment investigation was recently conducted into the Department. The focus of the investigation was not the Thornton custody matter. However, statements were made during the investigation by witnesses, which may have some relevance to the Thornton custody matter. The witness statements, the veracity of which are contested, primarily relate to alleged statements made by a Department employee evidencing an animus against the subject child’s father and a possible promise made to the foster parents of the subject child. An investigation report dated November 30, 2022 was prepared by an independent third-party investigator, which documents these alleged and contested statements. The existence of the report containing the alleged statements likely must be disclosed by you to opposing counsel in the Thornton custody matter.

The investigation report is a confidential personnel document that also contains references to a confidential child custody matter. *See* C.R.S. § 24-72-204(3)(a)(II)(A) and 24-72-204(3)(IV). It, therefore, cannot be released without a court order. If such an order is issued, the County will respond in accordance with the order.

Sincerely,

  
Jefferson H. Parker

12/7/2022