

CLAIM AGAINST THE COUNTY OF SAN MATEO

(Please print legibly or type. Please do not use pencil)

Claimant's Name:	RYAN MONAGHAN		
Claimant's Address:	C/O Charles Stone Goethals & Stone PC 1131 Howard Ave.		
City: Burlingame	State: CA	ZIP Code: 94010	Phone: 6503947390
Amount of Claim:	\$ Currently unknown.		

Address to which notices are to be sent (if different than above):
Please send to above attorney address.

Date of incident: / <u>Various See</u> _____ Attachment 1 /	Location of Incident: See Attachment 1
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WHAT particular action by the County or its employees caused the alleged damage or injury. How did it occur (describe damage or loss):

See Attachment "1" for date of incidents, location of incidents, and particular actions by County employees.

Name of Public Employee(s) causing injury, damage, or loss (if known):

1. Christina Corpus, Victor Aenlle, Daniel Perea, and other unknown employees
- 2.

Itemization of Claim: List Item(s) that total the amount above:

1. Reputational Damage.	\$ Currently Unknown.
2. Loss of earning capacity/future income.	\$ Currently Unknown
3. Emotional Distress.	\$ Currently unknown.
4. Punitive Damages.	\$ 5,000,000.00
TOTAL	\$ Currently Unknown.

I declare under penalty of perjury that the foregoing is true and correct:

Dated at Burlingame, California,
on March 19, 2025.

Signature of Claimant: Charles Stone Charles Stone, Attorney for Claimant

Return to: CLAIMS, Board of Supervisors, 400 County Center, Redwood City, CA 94063

ATTACHMENT 1

County of San Mateo Sheriff Christina Corpus (“Corpus”) recruited Ryan Monaghan to serve as a member of her executive team between October and December of 2022. Corpus met with Monaghan on multiple occasions to assess whether or not he was the right fit for her team. During one of those meetings, Mr. Victor Aenlle (“Aenlle”) accompanied her and interviewed Monaghan regarding his qualifications and whether he was the right fit for Corpus’ executive team.

On December 20, 2022, Corpus publicly released an announcement naming Mr. Monaghan as her new Assistant Sheriff. In the announcement, Corpus described Mr. Monaghan (“Assistant Sheriff Monaghan”) as a “leader that will help us implement modern, proactive approaches to policing.” She further described him as a “professional with deep roots in this community that has worked closely with the county’s many law enforcement agencies to enhance public safety.” In fact, Assistant Sheriff Monaghan had an impressive service record with over 28 years of experience. Assistant Sheriff Monaghan was and is respected throughout the law enforcement community locally as well as at the state and national levels. Assistant Sheriff Monaghan accepted Corpus’ employment offer as Assistant Sheriff because he believed in Corpus’ claimed vision for more transparency, better police services, and enhancing employee morale and wellbeing through respectful and fair treatment of staff.

Based on Corpus’ assurances and professed beliefs, Assistant Sheriff Monaghan left his role as the Police Chief with the Town of Tiburon where he enjoyed a fulfilling job and healthy work environment. When Corpus announced the additions of Assistant Sheriff Monaghan and Undersheriff Chris Hsiung, who she also recruited to her team, she received tremendous support from law enforcement and other civic leaders from San Mateo County and beyond based on their reputations. As described by the team of professionals from Meliora Public Safety Consulting, who were commissioned in 2023 to conduct the San Mateo County Sheriff’s Office Organizational Assessment, Assistant Sheriff Monaghan and Undersheriff Hsiung were “police executives with a track record of applying a contemporary approach to leadership and public safety.”

Initially, Assistant Sheriff Monaghan was happy and excited to be part of Corpus’ executive leadership team in place with Undersheriff Hsiung as his direct supervisor and Mr. Aenlle acting as a peer. Assistant Sheriff Monaghan fully supported Corpus and championed her leadership to those within his chain of command, as well as critical county partners. Assistant Sheriff Monaghan often worked long hours making himself available to attend meetings and events on behalf of Sheriff Corpus after hours and on weekends. He was available to Corpus for questions and concerns day and night, regardless of degree of urgency. Assistant Sheriff Monaghan also took on extra responsibilities as the only full-time sworn assistant sheriff during a time of many changes in the Sheriff’s Office. Some of Assistant Sheriff Monaghan’s direct reports shared with him that his workload was greater than that of his predecessors based on the organizational

changes and vacancies on the executive team. Assistant Sheriff Monaghan found it unusual and odd that Aenlle, who had no experience as an executive in law enforcement and had little experience as a fulltime sworn peace officer, was treated by Corpus as a trusted advisor not only on matters involving civilian employees, but also regarding sworn personnel issues. However, he wanted to support Corpus and give Aenlle the benefit of the doubt as he began his new career with the Sheriff's Office. Sadly, Assistant Sheriff Monaghan was repaid for his hard work, dedication, and trust in Corpus by becoming the victim of retaliation, constructive termination, harassment, and defamation.

Over time, Assistant Sheriff Monaghan witnessed behavior from Corpus and Aenlle that clearly demonstrated Corpus' bias in favor of Aenlle. It also became clear that Aenlle had significant influence over Corpus and over the day-to-day operations of the Sheriff's Office despite Aenlle's lack of relevant experience. Aenlle regularly inserted himself into matters that were outside his scope of responsibility as illustrated by the September 21, 2023 Organizational Chart depicted on page 59 of the San Mateo County Sheriff's Office Organizational Chart.

Rather than dealing with the multiple complaints from staff members, including Assistant Sheriff Monaghan, about Aenlle's behavior, Corpus made excuses for Aenlle and empowered him to regularly undermine Assistant Sheriff Monaghan and other members of the organization.

In March of 2024, Aenlle undermined Assistant Sheriff Monaghan by injecting himself into correspondence between the County Attorney's Office and Assistant Sheriff Monaghan regarding a request from the City of Pacifica for assistance from the Sheriff's Office with the abatement of a dangerous makeshift encampment on a steep coastal cliff. In addition to responding to an email specifically directed to Assistant Sheriff Monaghan from the County Attorney's Office, Aenlle accused Assistant Sheriff Monaghan of overextending Sheriff's Office resources to the Police Chief of Pacifica because the chief was his "friend." Assistant Sheriff Monaghan and the chief had been professional associates for many years but were not close social friends. Aenlle then criticized Assistant Sheriff Monaghan for contacting the County CEO about the request despite Assistant Sheriff Monaghan having received permission from Corpus to do so.

In April of 2024, Aenlle criticized Assistant Sheriff Monaghan for how he handled a complaint against Aenlle from an outgoing manager who reported to Aenlle. The Professional Standards Bureau (PSB) Lieutenant appropriately brought the complaint to Assistant Sheriff Monaghan's attention, as the lieutenant and PSB fell under Assistant Sheriff Monaghan's command and since both the Sheriff and Undersheriff were both unavailable (S.O. Policy 200). When Assistant Sheriff Monaghan brought the complaint to Corpus' attention, she responded by saying the Records manager was overly emotional and explained how Aenlle had already told her about what had occurred and it seemed like the complainant was overreacting. In addition to expressing his displeasure to Assistant Sheriff Monaghan, Aenlle went on to state criticisms regarding Assistant Sheriff Monaghan's handling of the complaint to Undersheriff Hsiung,

Corpus, and to the PSB lieutenant. The PSB lieutenant brought Aenlle's discussion to Assistant Sheriff Monaghan's attention finding it inappropriate since a complaint with County Human Resources regarding the matter had already been lodged. Aenlle did this despite Undersheriff Hsiung expressly telling Aenlle he (Undersheriff Hsiung) took no exception with how Assistant Sheriff Monaghan handled the complaint and Corpus expressing to Assistant Sheriff Monaghan that she too took no exception with how he handled the complaint.

Between March of 2024 and September of 2024, Aenlle repeatedly made passive-aggressive statements to Assistant Sheriff Monaghan that Assistant Sheriff Monaghan perceived as Aenlle trying to assert his authority over him or as a means of intimidation. On more than one occasion, Aenlle made statements of warning telling Assistant Sheriff Monaghan that despite Aenlle being a "nice person," it would be ill advised to do anything that Aenlle perceived as wronging him. Based on Assistant Sheriff Monaghan's knowledge of and experience with Aenlle these statements were a clear attempt at intimidation and may have been an attempt to discourage Assistant Sheriff Monaghan from cooperating with the Cordell investigation.

On or around June 10, 2024, Aenlle told two female professional staff members in the presence of Assistant Sheriff Monaghan that as "Chief of Staff", he was able to give orders to anyone *regardless of chain-of-command* or whether it upset Assistant Sheriff Monaghan.

On June 17, 2024, Assistant Sheriff Monaghan went out of town to attend his father-in-law's memorial service. On June 20, 2024 while Assistant Sheriff Monaghan was still away, Undersheriff Hsiung contacted him and stated he was resigning from his role with the Sheriff's Office effectively immediately. Later that evening, Assistant Sheriff Monaghan had a phone conversation with Corpus about a separate work-related matter. Assistant Sheriff Monaghan could hear Aenlle's voice in the background during his conversation with Corpus. Corpus did not mention anything to Assistant Sheriff Monaghan about Undersheriff Hsiung's sudden resignation nor about any significant impending leadership changes during that call.

The following morning (June 21, 2024), Assistant Sheriff Monaghan read an officewide email from Corpus in which she announced Undersheriff Hsiung's departure and the hiring of Dan Perea as Undersheriff. Later that evening, Corpus phoned Assistant Sheriff Monaghan and acted like nothing had happened. Corpus then explained how she had been hearing rumors regarding a plan she had to terminate Assistant Sheriff Monaghan or that Assistant Sheriff Monaghan planned on resigning. Corpus assured Assistant Sheriff Monaghan she had no intention of terminating him, that she was happy with his performance, and that she hoped he would continue to serve on her executive team.

During a morning meeting between Assistant Sheriff Monaghan, Aenlle, and Corpus on or about June 24, 2024, Corpus and Aenlle got visibly angry about the distribution of an email from the civilian Sheriff's Office PSB manager attaching Undersheriff Hsiung's resignation letter, (sending such a letter out was standard protocol.) Aenlle stated that Undersheriff Hsiung did not resign but was "fucking terminated," which Assistant Sheriff Monaghan believed to be false

based on his conversations with Undersheriff Hsiung. Aenlle said he would work with the Technical Services Unit (Sheriff's IT support) to remove the email from the system so that it would not be subject to a Public Records Act (PRA) request. He also ordered Assistant Sheriff Monaghan not to open any emails regarding this issue. Both Corpus and Aenlle appeared very agitated and angry during that meeting.

On or about June 25, 2024, Corpus and Aenlle came to Assistant Sheriff Monaghan's office accompanied by Corpus. Aenlle told Assistant Sheriff Monaghan that Corpus needed to speak with him. Corpus spoke with Assistant Sheriff Monaghan privately and insinuated that Assistant Sheriff Monaghan was sharing confidential information from Sheriff's Office executive team meetings with County CEO Mike Callagy which was untrue. Both Corpus and Aenlle had made similar unfounded insinuations before. At this point, this was not strange to Assistant Sheriff Monaghan as he had come to believe that Corpus and Aenlle had a substantial sense of paranoia and suspicion around many individuals within the Sheriff's Office and County.

Soon after that, in or around July of 2024, when Undersheriff Dan Perea ("Perea") took his post, Assistant Sheriff Monaghan began to be excluded from executive team meetings and strategic decisions. Between July 1, 2024 and September 20, 2024, was excluded from at least eleven meetings involving Perea, Aenlle, Corpus, and Fox or a combination thereof. Assistant Sheriff witnessed his exclusion from the meetings or was told about them after the fact from other staff members who also thought it was odd how he was being excluded from these meetings. Excluding an assistant sheriff from these meetings was a deviation from prior procedure and protocol.

On or about July 1, 2024, Aenlle called then-Captain Matt Fox into a closed-door meeting. Despite Captain Fox being Assistant Sheriff Monaghan's direct report and Monaghan previously asking Aenlle on multiple occasions to include him on matters related to personnel who reported to him (Monaghan,) the meeting went forward without Assistant Sheriff Monaghan's presence. None of the details of this meeting were shared with Assistant Sheriff Monaghan. Assistant Sheriff Monaghan later learned about multiple other meetings Aenlle had with Fox in which Assistant Sheriff Monaghan was purposefully excluded.

On or about July 8, 2024, Aenlle approached Assistant Sheriff Monaghan and questioned Assistant Sheriff Monaghan about an operational change Assistant Sheriff Monaghan had made as a result of the Meliora Organizational Assessment. Aenlle accused Assistant Sheriff Monaghan of making the change without Corpus' permission. Assistant Sheriff Monaghan explained to him that he had discussed the change with Corpus and she agreed to it.

On or about July 10, 2024, Aenlle got visibly angry with Assistant Sheriff Monaghan and raised his voice at Assistant Sheriff Monaghan because Assistant Sheriff Monaghan had answered a question Aenlle's secretary asked regarding which individuals were to attend a command staff meeting. When Assistant Sheriff Monaghan tried to respond to Aenlle's issues Aenlle angrily interrupted Assistant Sheriff Monaghan repeatedly. A nearby secretary witnessed the interaction

and later told Assistant Sheriff Monaghan that she felt Aenlle's demeanor and comments were inappropriate and an overreaction.

On or about July 11, 2024, Assistant Sheriff Monaghan was informed that Captain William Fogarty and Captain Frank DalPorto, who were both Captains with the Corrections department, were reporting directly to Aenlle. This was strange to Assistant Sheriff Monaghan as Aenlle's role as "Chief of Staff" did not place him in the chain of command over sworn personnel nor was Assistant Sheriff Monaghan aware of any qualifications and experience Aenlle possessed to oversee such a critical function in the Sheriff's Office (Corrections.)

On or about July 16, 2024, Assistant Sheriff Monaghan learned that Aenlle had asked a Patrol administrative sergeant to move deputies assigned to Patrol around without consulting Assistant Sheriff Monaghan despite Assistant Sheriff Monaghan's responsibility for the bureau according to the organizational structure of the Sheriff's Office.

On or about July 23, 2024, Assistant Sheriff Monaghan learned of a prisoner overdose in San Mateo County Jail from Corpus when she called Assistant Sheriff Monaghan and questioned him about it. Corpus was upset that she had not learned of it from the assigned jail captain. When Assistant Sheriff Monaghan queried the respective captain about it, he informed Assistant Sheriff Monaghan he had reported the incident via text to new Pere and Aenlle. It was apparent to Assistant Sheriff Monaghan that he was intentionally being left out of the loop regarding important matters so it was odd that Corpus would question him about an incident that occurred in one of the jails after it had been made clear that Aenlle was overseeing the Captains responsible for corrections.

In late July/early August, 2024, Aenlle inserted himself into the planning of an active shooter training and rescheduled it without consulting with Assistant Sheriff Monaghan, PSB Captain Brian Phillip (who scheduled the training) or the Training Unit. Perea then ordered Assistant Sheriff Monaghan to fill the class with two weeks' notice. Assistant Sheriff Monaghan and the bureau captains explained that this would be difficult and would also cause an unnecessary strain on staffing based on staffing shortages and vacation time already granted. Perea disagreed and aligned himself with Aenlle's belief that the training should be held on short notice. Aenlle's and Perea's insistence to fill such a training session on short notice during the summer was completely unreasonable given already strained staffing, scheduled vacations, and mandatory overtime. Furthermore, Captain Phillip, who was tasked by Corpus to schedule the training, had planned the training in October to accommodate other trainings Corpus wanted prioritized and the availability of the training vendors. Despite being off work due to illness, Assistant Sheriff Monaghan set up a meeting with all the bureau captains to fill the training with orders from Perea to make the training mandatory and to use mandatory overtime to backfill any vacancies caused by those attending the training. This caused undue stress on staffing and prompted complaints from the unions.

On or about August 22, 2024, Assistant Sheriff Monaghan was excluded from a meeting regarding an internal investigation into a sergeant within his command. This was a significant

deviation from prior protocol and procedure in which all internal affairs matters came through PSB to Monaghan. No details were shared with Assistant Sheriff Monaghan regarding why the sergeant had been placed on administrative leave. Rather than explain the circumstances to Monaghan, Perea called Assistant Sheriff Monaghan into his office and ordered him not to talk to anyone about the investigation, which was odd considering Assistant Sheriff Monaghan had not even been informed of the investigation in the first place. Assistant Sheriff Monaghan later learned that Captain Brian Phillip, who, as the Captain overseeing the PSB, would normally have known about an internal investigation into a sergeant, had also been excluded from information about the investigation. This was a further deviation from the norm without any explanation other than wanting to “keep it confidential.”

On or about August 30, 2024, Assistant Sheriff Monaghan learned of a mandatory meeting regarding a Public Employee Relations Board (PERB) complaint filed by the Deputy Sheriff’s Association (DSA) and Office of Sheriff’s Sergeants (OSS). Assistant Sheriff Monaghan was not directly informed of this meeting by the Sheriff or Undersheriff, nor was Assistant Sheriff Monaghan included in the meeting.

On or about September 3, 2024, Assistant Sheriff Monaghan received a phone call from Captain Brian Phillip. Captain Phillip indicated to Assistant Sheriff Monaghan that he had been ordered by Perea to serve the sergeant who was placed on administrative leave on August 22, 2024, with an IA notice. Captain Phillip informed Assistant Sheriff Monaghan that he had not been included in the briefing or any other discussions about the IA and had expressed concerns about serving it. Captain Phillip was concerned that the actions of Perea were contrary to Sheriff’s Office protocol, practice, and procedures. He also expressed concerns about compliance with the Peace Officer Bill of Rights. Captain Phillip told Assistant Sheriff Monaghan he had emailed Perea to let him know he (Captain Phillip) would serve the notice once the person who drafted it updated it for compliance with POBR. Later that day, Corpus called Assistant Sheriff Monaghan to talk about Captain Phillip’s decision not to sign the notice. Corpus told Assistant Sheriff Monaghan that Captain Phillip would be excluded from the process of serving the notice and that the executive team would handle it. Assistant Sheriff Monaghan then asked Corpus why normal protocol was not being followed. Corpus told Assistant Sheriff Monaghan that she did not “trust” “someone” in the Professional Standards Bureau to keep things confidential. Assistant Sheriff Monaghan was later ordered to serve the IA notice even though he had nothing to do with the investigation and expressed procedural concerns about how that matter was being handled. Assistant Sheriff Monaghan found it odd and concerning that Aenlle was involved in briefings about the confidential investigation despite his lack of a position in the chain of command over sworn personnel and the Sheriff’s desire to limit who knew about the details.

On or about September 4, 2024, while at a conference in Anaheim, Aenlle called Assistant Sheriff Monaghan and chastised him for not saying hello to Corpus when he walked past in her the morning on his way to the conference classes. Assistant Sheriff Monaghan explained that he had not seen Corpus or he would have greeted her. Aenlle then told Monaghan how Corpus wished to speak with him. Assistant Sheriff Monaghan thought it was odd that Corpus did not

call him on her own and, instead, that Aenlle was again attempting to give Assistant Sheriff Monaghan orders.

On or about September 5, 2024, while still at the conference, Assistant Sheriff Monaghan was confronted by Aenlle in the presence of Perea and Corpus. Aenlle seemingly attempted to interrogate Assistant Sheriff Monaghan about his involvement in recent PERB complaints filed by the DSA and OSS (Assistant Sheriff Monaghan was the only executive team member not named in them) and his involvement in a storm of negative commentary about Perea, Sheriff Corpus, and Aenlle in recent online press articles about the Sheriff's Office. Aenlle told Assistant Sheriff Monaghan that Aenlle found it "weird" that Assistant Sheriff Monaghan was the only member of the executive team not named in the PERB complaints. It was clear to Assistant Sheriff Monaghan from Aenlle's tone and body language that Aenlle was insinuating that Assistant Sheriff Monaghan had something to do with the initiation of these complaints. This attempted interrogation was not only inappropriate but constituted harassment.

On or about September 9, 2024, Assistant Sheriff Monaghan was told by Perea that he needed to be present for a meeting Perea wanted to have with Captain Phillip. During this meeting, without any warning, Perea informed them that Captain Phillip would be spending some time with Captain Fogarty in Corrections. Only after being pressed by Captain Phillip, did Perea admit Captain Phillip was being transferred to Corrections. Assistant Sheriff Monaghan found the timing of this unexplained and sudden transfer odd, especially given Captain Phillip's recent actions in refusing to sign and IA notice until it was compliant with POBR and policy.

On September 11, 2024, Assistant Sheriff Monaghan was waiting with Perea and Aenlle for Corpus to meet with them. Aenlle told Assistant Sheriff Monaghan that Aenlle was "disappointed" with people in the office who he perceived to be untruthful in their complaints about him. Aenlle brought up the PERB complaint by the unions and asked Assistant Sheriff Monaghan if he was aware of Aenlle's involvement in negotiations with the union. Assistant Sheriff Monaghan told Aenlle that he was not and reminded Aenlle that he had been told he was to refer all union matters to Perea and that he (Assistant Sheriff Monaghan) had been told he was not allowed to have any interactions with the unions. Aenlle then told Assistant Sheriff Monaghan that Aenlle's attorney would need Assistant Sheriff Monaghan to testify on Aenlle's behalf. Assistant Sheriff Monaghan found this strange and threatening since he was unaware of any pending litigation that Aenlle was involved in. Assistant Sheriff Monaghan responded to Aenlle by saying he would be happy to give truthful testimony if necessary. Based on his experience with and observations of Aenlle, Assistant Sheriff Monaghan interpreted this as an attempt by Aenlle at intimidation and potential witness tampering.

On or about September 17, 2024, Assistant Sheriff Monaghan was in the parking lot of the Half Moon Bay Sheriff's Office substation with Perea and Aenlle. Aenlle asked Assistant Sheriff Monaghan if Assistant Sheriff Monaghan had spoken with retired Judge LaDoris Cordell as part of her investigation into him and Sheriff Corpus. Assistant Sheriff Monaghan informed him that had spoken to the judge. Aenlle responded by saying, "When were you planning on telling us?" Assistant Sheriff Monaghan found this to be Aenlle's attempt to intimidate a witness especially

within the context of Aenlle being a subject of the investigation. Assistant Sheriff Monaghan told Aenlle that Aenlle should understand how investigations are handled and made no further comment. Despite standing nearby and overhearing the conversation, Perea did not intercede or try to stop Aenlle from engaging Assistant Sheriff Monaghan about the confidential administrative investigation into complaints against Aenlle. As an Undersheriff witnessing potential witness tampering and intimidation, it was incumbent on Perea to intercede and protect Assistant Sheriff Monaghan; instead, he stood by and did nothing but stare at Assistant Sheriff Monaghan in a menacing manner.

On or about September 18, 2024, Assistant Sheriff Monaghan spoke with Corpus and shared his concerns regarding Aenlle's attempt to engage Assistant Sheriff Monaghan about the Cordell investigation. Assistant Sheriff Monaghan told Corpus that he thought Aenlle's question and comment to him were inappropriate. Corpus told Assistant Sheriff Monaghan that she did not believe it was inappropriate for Aenlle to question people about the investigation and claimed the investigation was a "witch hunt," and that only people who had unfavorable things to say about Aenlle were being questioned.

On or about September 19, 2024, the Sheriff held a press conference regarding an employee daycare facility. There was a regularly planned executive team meeting on calendar at the same time. No one notified Assistant Sheriff Monaghan the meeting was canceled and despite seeing Corpus and Perea moments before the press conference, Assistant Sheriff Monaghan was not informed of the press conference. The remainder of the executive team, other than Assistant Sheriff Monaghan, and Captain Fox participated in the press conference. Assistant Sheriff Monaghan was later told that this was intentional.

On or about Friday September 20, 2024, just three days after he had been interrogated by Aenlle regarding his cooperation with the Cordell investigation and two days after personally informing Corpus, Assistant Sheriff Monaghan was called by Perea and ordered to return to Sheriff's Office headquarters despite Monaghan telling Perea he was on his way to a planned meeting elsewhere. When Assistant Sheriff Monaghan arrived, Perea told Assistant Sheriff Monaghan they needed to meet with Corpus in her office. There, Corpus began to cry and told Assistant Sheriff Monaghan she was "disappointed in him" because of "things" she had heard Assistant Sheriff Monaghan had said about her. Corpus further told Assistant Sheriff Monaghan she was also upset with Assistant Sheriff Monaghan because Assistant Sheriff Monaghan had not checked in with her regarding how she was doing in light of all the negative press coverage of her. Assistant Sheriff Monaghan explained how he had been treated differently ever since Undersheriff Hsiung had resigned. He explained how he had been frozen out of important meetings and decisions. Perea then interrupted Assistant Sheriff Monaghan and told him that was not to be part of the discussion. Corpus then said she could not "trust" Assistant Sheriff Monaghan anymore. Perea then escorted Assistant Sheriff Monaghan back to Assistant Sheriff Monaghan's office where he asked for Monaghan's badge, gun, and ID. Assistant Sheriff Monaghan was not presented with any paperwork typically associated with termination of employment. Assistant Sheriff Monaghan was not afforded any due process in this termination.

There was never any indication that Assistant Sheriff Monaghan's termination was based on performance issues nor was he afforded the due process required when an employee is being terminated for cause. Assistant Sheriff Monaghan was never placed on a Performance Improvement Plan nor was he ever informed verbally or in writing that his performance was substandard or in need of immediate improvement. Moreover, Assistant Sheriff Monaghan had never been counseled for unsatisfactory performance nor had ever received a performance evaluation. Corpus' summary dismissal of Assistant Sheriff Monaghan without cause, without due process, and under thinly veiled pretenses was a clear instance of retaliation against Assistant Sheriff Monaghan for his cooperation with the Cordell investigation.

It was evident by Corpus', Perea's, and Aenlle's actions toward Assistant Sheriff Monaghan that he had been constructively terminated long in advance of Perea asking for his gun, badge, and department ID. His refusal to remain silent as Corpus, Aenlle, and Perea made unsound decisions and played loose and fast with the law and Sheriff's Office policy clearly made him an "outsider" to Corpus. His refusal to allow Aenlle to treat him as a subordinate annoyed and irritated Corpus and Aenlle.

Since the announcement of Assistant Sheriff Monaghan's termination, Corpus and Aenlle have made public statements they knew or reasonably should have known to be false about Assistant Sheriff Monaghan's termination. Furthermore, Corpus and Aenlle knew or reasonably should have known that making public comments regarding confidential employment matters is prohibited without expressed permission. Specifically, and as published in a document from Corpus to then Board of Supervisors President Warren Slocum, dated September 22, 2024, and shared with multiple media outlets, Corpus stated that Assistant Sheriff Monaghan engaged in "performance duplicity" and was guilty of "failure to execute the goals of the Sheriff's Office expeditiously." These statements about Assistant Sheriff Monaghan's job performance are patently false, were made in the course and scope of Corpus' employment with the county, were made with the knowledge they were false, and have harmed Assistant Sheriff Monaghan.

On or about October 31, 2024, Aenlle stated that "Mike Callagy is the godfather of Ryan Monaghan's daughter." This is a false statement intentionally made with malice by Aenlle to try to discredit both Mr. Callagy and Assistant Sheriff Monaghan. On information and belief, Aenlle made this statement at the urging of and in civil conspiracy with Corpus. Aenlle knew this statement was false when he made it.

Most recently on March 1, 2025, Corpus alluded publicly to Assistant Sheriff Monaghan's termination stating she had to "let go" of an assistant sheriff because of "job performance" and "also because he was feeding information to the County Executive." These statements about Assistant Sheriff Monaghan's job performance are patently false, were made in the course and scope of Corpus' employment with the county, were made with the knowledge they were false, and have harmed Assistant Sheriff Monaghan.

As noted in Judge LaDoris Cordell's report, there is evidence that Corpus and Aenlle have engaged in a pattern of retaliation and as clearly documented on page 59 of Judge Cordell's

report, Assistant Sheriff Monaghan's termination was retaliation for his participation in Judge Cordell's independent investigation. On information and belief, Corpus and Aenlle have continued to make defamatory statements about Assistant Sheriff Monaghan both internally and externally, including to the media. Although the County eliminated Aenlle's position as Executive Director of Administration, his photo, name, and title still appear on the Sheriff's Office website, despite all other previous employees' photos being promptly removed. This gives Aenlle's defamatory statements the imprimatur of the County.

Assistant Sheriff Monaghan had an excellent reputation prior to Corpus' retaliation. His distinguished and decorated career in law enforcement is now permanently sullied by her, Aenlle's, and Perea's retaliatory acts as well as by her and Aenlle's defamatory statements, all committed in the course and scope of those individuals' employment for the County of San Mateo.

In addition to the reputational harm this caused Assistant Sheriff Monaghan and his family, Assistant Sheriff Monaghan's future earning capacity has been dramatically negatively affected by the acts of Corpus, Aenlle, and Perea which were carried out in the course and scope of their employment for the County of San Mateo. His loss of future income is significant, as well. Finally, Assistant Sheriff Monaghan has suffered substantial emotional distress as a result of the actions of Corpus, Aenlle, and Perea. His compensatory damages are likely in the multiple millions of dollars. The despicable and outrageous conduct of Corpus, Aenlle, and Perea forms the basis for an award of punitive damages in excess of \$5,000,000.