

CLAIM AGAINST THE COUNTY OF SAN MATEO

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

Claimant's Name:	Christina Corpus		
Claimant's Address:	c/o Brad Gage Law, APC- 23002 Victory Blvd		
City: Woodland Hills	State: CA	ZIP Code: 91367	Phone: (818) 340-9252
Amount of Claim:	\$ 10,000,000.00		

Address to which notices are to be sent (if different than above):	RECEIVED IN THE OFFICE OF DEC 19 2024
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Date of incident: 12/ 03 / 2024	Location of Incident: See attachment.	CLERK OF THE BOARD OF SUPERVISORS
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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.

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

1. See attachment.
- 2.

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

1. Discovery Continues.	\$
2.	\$
3.	\$
4.	\$
TOTAL	\$

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

Dated at San Francisco, California,

on December 18, 2024.

Signature of Claimant: /s/ Christina Corpus

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

Bradley C. Gage*

Wayne Smith

*A PROFESSIONAL LAW CORPORATION



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Sarah E. Gage

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December 18, 2024

GOVERNMENT CLAIM FACTUAL STATEMENT

SUMMARY

This is a case about a County discriminating against, harassing and defaming a dedicated public servant because the defendants do not want either a woman or a Latin X person as the head of their Sheriff's Department. Yet, the public saw that Sheriff Christy Corpus was the leader they needed in light of claims of mismanagement and improper conduct by the prior administration. To accomplish their evil scheme Noleioa Corzio disclosed confidential information from a police officer personnel investigation in violation of Sheriff Corpus' rights under the Peace Officers Bill of Rights (POBR) and defamed Sheriff Corpus outside of the litigation context.

Compounding the violations, Retired Judge Cordell presented what appeared to be a complete investigation to skewer Sheriff Corpus with false allegations and unsupportable "findings." We now know that there was fraud by the defendants in connection with that "investigation." Specifically, 29 pages of interviews were left out of what was misrepresented to be a complete transcript. Those pages which were exculpatory demonstrate that the supposedly "independent investigation" was anything but independent. It is amazing what some Judges will do for money. While we know the County paid Judge Cordell for her hit piece, we do not yet know how much was paid, but that is the subject of a public records act request which we seek as part of this Government Claim and will ask for separately as well.

Judge Cordell was hired to investigate the sheriff's office at the request of County Executive Mike Callagy.

The defendants have now used the false investigation to seek a special recall never used before and that will terminate after Sheriff Christy Corpus' term expires, to try and fire her on false accusations. It is time to fight back and bring the truth out. This Government claim is just the first part of that process.

FACTS

Sheriff Christy Corpus has helped to protect and serve our communities for 25 years, honorably serving the County of San Mateo throughout that time. She was elected Sheriff on or about June 7, 2022 because the public wanted to improve accountability and transparency in the Sheriff's Department. However, there are some who do not want to embrace honesty and accountability. As a result, they have tried to

spread false and salacious rumors about Sheriff Corpus. Some of those detractors do not like the fact she is the first female and first Latin X Sheriff in the 167 year history of the Sheriff's Department. But racism, harassment discrimination and retaliation are not legal.

To accomplish its discrimination, Defendant San Mateo County retained retired judge, LaDoris Cordell. As noted by ABC, the supposedly full and official transcript of the tape recorded interviews that Judge Cordell performed was not true. Most of the Judge's interviews were not recorded at all. Why would a Judge violate legal canons of honesty and credibility? Approximately 29 pages of tape recorded statements that refute the report that Cordell prepared were left out of her transcript. Other witnesses that Cordell supposedly relied upon have not been identified. Obviously, if Cordell would cover up part of the tape recorded interviews, she is likely to mis-state what folks said to her when not tape recorded at all.

One of the defamatory allegations is that Victor Aenlle was supposedly giving orders to Sheriff Christy. Yet, all tape recorded interviews that Cordell received prove the allegation is false. Nevertheless, members of the Board of Supervisors, like Supervisor Corzo have relied upon the Cordell investigation to maliciously attack and malign the character of Sheriff Corpus.

Cordell also made false accusations against Victor Aenlle who previously worked in real estate and private security for several years. Cordell accused Aenlle of continuing to perform such outside work after joining the Sheriff's Department, but he did not. When Judge Cordell asked Aenlle if he had any outside employment, he responded, "no ma'am." In concluding that Aenlle broke sheriff's office rules by having "outside employment that has not been approved," Cordell cited to a Linked in account and an anonymous employee claiming Aenlle was showing houses one day this year. Of course, we all know why employees would remain anonymous, it allows them to lie with impunity.

Cordell confused Coldwell Banker with CBRE. Cordell thought that CBRE meant Coldwell Banker Real Estate when in fact it stands for CB Richard Ellis. Yet, Cordell erroneously thought that Aenlle had a conflict of interest in negotiating a lease for a new substation and childcare center for employees at the substation because of working for Coldwell Banker.

CB Richard Ellis is a global commercial real estate giant on the Fortune 500. Coldwell Banker is an unaffiliated regional real estate firm. Nevertheless, Judge Cordell believed that Aenlle must have known the CBRE broker on the property. The Judge never contacted the CBRE Broker, Bob McSweeney, but ABC reporter Dan Noyes did and confirmed that neither McSweeney nor Aenlle knew one another before the childcare and substation lease.

The final report by Cordell is apparently 400 pages long. Easy to omit the key 29 pages, when interspersed through that report. Could it possibly be a coincidence that the missing pages are the most significant exculpatory statements? A retired judge would not normally be so sloppy. So was it possibly mere negligence and sloppiness or something more sinister? When considering the totality of events and how this one-sided report has been used to defame Sheriff Corpus and seek to terminate her, the odds of an innocent mistake seem harder to believe than winning the lottery.

How does Judge Cordell explain that page 49 is missing from her report? That is where Aenlle told the judge, "And just for the record, ma'am, I guess I want to make sure that it isn't misunderstood: I never in any capacity or by myself... benefited from any, any deals or been representing myself as a broker or agent at all whatsoever." Did the Independent Investigation Fairy pluck the exculpatory page from the report?

Cordell also thought she found a potential misdemeanor by Aenlle and Corpus because Aenlle had a gold

badge with a "Chief of Staff" rocker "allowing him to impersonate a full-time, salaried sworn employee with full police powers" as reported by ABC. The same "Independent Investigation Fairy" snatched the responses by Aenlle to this malicious and false accusation as well. Missing is the testimony about the badge in which it is revealed, "all sworn personnel and civilian staff have gold badges." Moreover, Aenlle has been a sworn reserve deputy for 17 years in the San Mateo Sheriff's Department.

Cordell apparently never checked the qualifications and training of Aenlle though it was easily available. Individuals have apparently misconstrued his background and qualifications as well, perhaps mistakenly relying on the incorrect report by Cordell.

On or about November 13, 2024 in an Instagram Post, Supervisor Corzo and County Executive Michael Callagy, also violated the rights afforded to all peace officers in the State of California by releasing confidential and one-sided investigations of Sheriff Corpus. Every member of law enforcement in California is entitled to rights of privacy which the county and other defendants have maliciously violated. Corzo even falsely sated on her Instagram, on or about November 26, 2024, "We don't have a sheriff we can trust," further claiming, "about why our sheriff is not trustworthy."

Corzo brought up false allegations against Sheriff Corpus again on December 3, 2024. County Executive Michael Callagy, appears to be more interested in seeking details of Sheriff Corpus' private life, going so far as falsely implying, and questioning about the Sheriff's romance. In connection with harassment, discrimination, retaliation (including whistle blower retaliation) the San Mateo Board of Supervisors initiated the unprecedented act of seeking a special election for March 4, 2025 to remove the first ever Latina Sheriff. Such racial and ethnic targeting is not constitutional and subject to injunctive relief.

As part of the attempts to malign Corpus, and Aenlle, criticisms were leveled about improvements made to the new sheriff's headquarters. Sheriff Corpus wanted the plans of the building to be looked at because no one ever had done so. That transcript is also mysteriously missing, but the tapes apparently show that Aenlle was extremely concerned about the lack of security at the building including lack of key card readers, surveillance cameras, safety doors or metal detectors. \$750,000 of security had to be added to improve the safety of the building for employees (civilian and sworn) who are obvious targets because they are law enforcement agencies. This of course is less than the approximately \$800,000 per year that County Executive Michael Callagy reportedly receives.

Very truly yours,
Brad Gage Law
A Professional Corporation
/s/ Bradley C. Gage
Bradley C. Gage

08/13/24 00:52



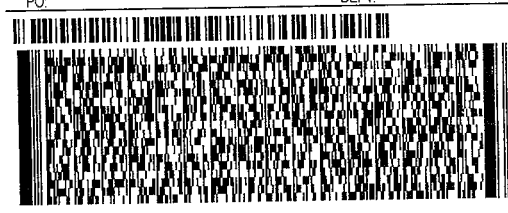
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ORIGIN ID:SFRA (818) 340-9252
BRADLEY C. GAGE
BRAD GAGE LAW, APC
23002 VICTORY BLVD
WOODLAND HILLS, CA 91367
UNITED STATES US

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TO **CLAIMS**
BOARD OF SUPERVISORS
400 COUNTY CENTER

REDWOOD CITY CA 94063
(818) 340-9252 REF: CORPUS - GOVT CLAIM
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