

# CLAIM AGAINST THE COUNTY OF SAN MATEO

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

Claimant's Name:	Michael P. Callagy		
Claimant's Address:	c/o James Hartnett, attorney for claimant 204 Upland Court		
City: Redwood City	State: CA	ZIP Code: 94062	Phone: 650 400 3856
Amount of Claim:	\$ 10.5 million dollars (at least)		

Address to which notices are to be sent (if different than above):  
Above by mail, also by email to: hartnettjim@comcast.net

Hand Delivered

RECEIVED  
IN THE OFFICE OF  
MAR 13 2025  
CLERK OF THE  
BOARD OF SUPERVISORS

Date of incident: <u>09 / 22 / 2024</u>	Location of Incident: Redwood City and other venues. See attachment
--	--

**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. Christina Corpus
2. Victor Anelle

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

1. Special damages	\$ 4 million dollars
2. General damages	\$ 2.5 million dollars
3. Punitive damages	\$ 4 million dollars
4.	\$
<b>TOTAL</b>	<b>\$ 10.5 million dollars</b>

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

Dated at Redwood City, California,

on March 13, 2025.

Signature of Claimant:

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

Attachment to Governmental Claim of Mike Callagy submitted to San Mateo County

Mike Callagy is the Chief Executive Officer of the County of San Mateo.

This claim is made in connection with the statements and conduct of Sheriff Christina Corpus and her former Administrative Manager "Chief of Staff" Victor Aenlle.

On September 22, 2024, Sheriff Corpus called and conducted a press conference during which she set forth false statements of fact regarding Mr. Callagy. Television and printed press outlets attended the press conference and reported on it. On information and belief, the County of San Mateo is in possession of a video of the press conference.

Among the false statements of fact by Sheriff Corpus during the press conference are the following:

"During that meeting, [referencing her first meeting with Mr. Callagy following her election] he made an inappropriate and offensive request ordering me to inform him who I dated within the county and when." That statement is false, defamatory, made in anger and hostility towards Mr. Callagy, and was made with malice.

"He made a unilateral decision without my further input in negotiation with the unions that have cost the taxpayers of our county \$17 million." That statement is false, defamatory, made in anger and hostility towards Mr. Callagy, and was made with malice.

"Since day one, Mr. Callagy has continued to overstep his authority routinely inserting himself into the operations of the Sheriff's office." That statement is false, defamatory, made in anger and hostility towards Mr. Callagy, and was made with malice.

"He has supported the group of employees referred to as the 'good old boy system.' That statement is false, defamatory, made in anger and hostility towards Mr. Callagy, and was made with malice.

In obvious reference to Mr. Callagy, she claimed "retaliation, abuse of power, discrimination and bullying tactics." That reference and statement is false, defamatory, made in anger and hostility towards Mr. Callagy, and was made with malice.

Sheriff Corpus has repeated the above and similar false statements to the press and others since September 22, 2024. Discovery is ongoing as to her repeated and further statements, and as necessary this claim shall be amended.

Sheriff Corpus was interviewed by TV newscaster Dan Noyes and stated that Mr. Callagy contacted a police Chief and asked that person to take her place. That is a false statement of fact, is defamatory, made in anger and hostility towards Mr. Callagy, and was made with malice.

On information and belief, Sheriff Corpus and Mr. Aenlle conspired to publish the above false statements and conspired with ill will, anger, hostility and malice towards Mr. Callagy to intentionally damage Mr. Callagy's reputation with these false statements.

At the time that Sheriff Corpus made and repeated the above statements, she knew them to be false. The statements are not privileged. She made the statements with malice, and with the intent to harm the reputation of Mr. Callagy, to affect his current and future employment and earning

capacity, and to cause him severe emotional distress, and to distract from allegations of wrongful conduct by Sheriff Corpus and Mr. Anelle. She has intentionally and repeatedly portrayed him in a false light. The County of San Mateo knows as a matter of fact that the statements of Sheriff Corpus are false.

During the September 22, 2024, press conference, Sheriff Corpus demanded that the Board of Supervisors cause the "bullying tactics" to stop, in other words to conduct an investigation. However, Sheriff Corpus has obstructed the investigation by repeatedly avoiding interviews by independent investigators retained by the County of San Mateo to review the allegations. By avoiding the interviews, she has intentionally prolonged the investigation which would clear Mr. Callagy of the unfounded allegations, and during which time, on information and belief, she has repeated the false statements. On information and belief, her obstruction of the investigation has been with the intent and purpose of causing Mr. Callagy severe emotional distress and is and was done with malice. In fact, Mr. Callagy has willingly and without reservation been interviewed twice by investigators, while Sheriff Corpus continues to avoid being interviewed about her malicious and false allegations.

Victor Aenlle has published and stated numerous false statements of fact to third parties about Mr. Callagy during his time as an Administrative Manager "Chief of Staff" for Sheriff Corpus. Among the false statements made on or about October 31, 2024, are the following:

"Mike Callagy is the godfather of Ryan Monaghan's daughter." This statement is false and defamatory and portrayed Mr. Callagy in a false light. Mr. Anelle made the statement in a context to make it appear that Mr. Callagy had a personal, improper reason to protect Assistant Sheriff Monaghan from termination by Sheriff Corpus. Mr. Anelle, on information and belief made the false statement at the direction of Sheriff Corpus and said statement was made to the press. The false statement was also made to SEIU union representatives in an attempt to discredit Mr. Callagy and disrupt union negotiations Mr. Callagy was engaged in. Mr. Anelle made the statement either with knowledge of its falsity or with reckless disregard for the truth, and with anger, ill will, hostility, and malice towards Mr. Callagy, and to distract from allegations of wrongful conduct of Sheriff Corpus and Mr. Anelle.

Mike Callagy "targeted his [Anelle's] property on the coast to discredit him and weaken the Sheriff's office." Mr. Anelle made the statement in the context of an investigation into prolific code violations and property tax evasion, found on property Mr. Anelle owns in unincorporated San Mateo County, and made the statement to cause persons to draw the conclusion that Mr. Callagy had something to do with the decision regarding investigating and finding code violations on Mr. Anelle's property, and that in doing so he had an improper and illegal purpose. The statement is false and defamatory and portrayed Mr. Callagy in a false light. Mr. Anelle made the statement either with knowledge of its falsity or with reckless disregard for the truth, and with anger, ill will, hostility, and malice towards Mr. Callagy, and to distract from allegations of wrongful conduct of Sheriff Corpus and Mr. Anelle.

Mike Callagy is "shutting down the Sheriff's daycare plans in retaliation to the Sheriff." Mr. Anelle made the statement in the context of the disapproval of an incomplete proposal for a day care center and day care operation by the Sheriff, and was made with the intent to cause persons to draw the conclusion that the Sheriff had a daycare plan which Mr. Callagy improperly disapproved,

and that the disapproval was for an improper and illegal purpose. This statement is false and defamatory and portrayed Mr. Callagy in a false light. Mr. Anelle made the statement either with the knowledge of its falsity or with reckless disregard for the truth, and with anger, ill will, hostility, and malice towards Mr. Callagy, and to distract from allegations of wrongful conduct of Sheriff Corpus and Mr. Anelle.

On information and belief, Sheriff Corpus and Mr. Anelle conspired to publish the above false statements.

Mr. Anelle's statements and conduct are with malice, anger, ill will and hostility towards Mr. Callagy. He has proclaimed to a number of people, "Mike Callagy does not know who he is fucking with."

To be clear:

1. Mr. Callagy did not at any time order or ask Sheriff Corpus to inform him of who she was dating within the county and when.
2. Sheriff Corpus knew about the union negotiations she referenced. Emails will demonstrate she was directly involved in the negotiations of the double time with the Deputy Sheriff's Association and the Human Resources Department, and it was the decisions and failures of Sheriff Corpus regarding monitoring and supervising overtime that unnecessarily caused the taxpayers loss of millions of dollars.
3. From the date of her election, Mr. Callagy went to extraordinary lengths to assist Sheriff Corpus to be successful, starting with unprecedented approval of contracts requested by Sheriff Corpus, and paid for by county funds, not from the Sheriff's budget, for a "transition team" to assist her between election day and the assumption of office. Rather than "routinely overstepping his authority," he went out of his way to exercise his authority to help the Sheriff and to encourage others to do so as well.
4. As to supporting the "good old boys," Mr. Callagy has no idea who Sheriff Corpus is referring to and evidence will demonstrate he went out of his way to support the Sheriff and the team that the Sheriff herself brought into the organization.
5. As to "retaliation, abuse of power, discrimination and bullying tactics", Sheriff Corpus is looking in the wrong direction, she should look in the mirror and to the conclusion of Judge LaDoris Cordell: "Lies, secrecy, intimidation, retaliation, conflicts of interest, and abuses of authority are the hallmarks of the Corpus administration."
6. Mr. Callagy is not the godfather of Ryan Monaghan's daughter and would not recognize her if she walked in front of him.
7. Mr. Callagy had no role in the decision to investigate Mr. Anelle's property in unincorporated San Mateo County for code violations, was on vacation when the property was found and the connection to Anelle was made, had no advance notice of any such investigation, and made no decisions as to whether or not there were code violations. When he did learn that there were possible violations on Mr. Anelle's property, he told staff to treat him like any resident, no better and no worse.
8. As to the Sheriff's daycare plans, there was no plan presented on how it would be run, there was no proforma, no plan as to who would run it, how it would be paid for, what the tax liability would be to the deputies, what the subsidy would be, what the need was, and who

would use it. There was no meet and confer with the union, zoning was a question, and there was no consideration if this was granted what it would mean for the rest of County employees. There were current spaces open in the County daycare center.

9. At no time did Mr. Callagy solicit any police chief, or other person, to become Sheriff in place of Sheriff Corpus.

As a result of their conspiracy to damage Mr. Callagy's reputation by knowingly making false statements and through the despicable conduct of Sheriff Corpus and Mr. Anelle, Mr. Callagy's reputation has in fact been damaged, he has suffered severe emotional distress and humiliation, his employment has been interfered with, and his earning capacity has been diminished.

Sheriff Corpus and Mr. Anelle were acting in concert in the course and scope of their employment as employees of San Mateo County at all relevant times stated herein, but they are also personally jointly and severally liable and responsible for the damages caused to Mr. Callagy by their willful and wanton statements and conduct, including punitive damages. They acted with oppression, fraud, and malice for their own personal gain, including to distract attention from their alleged wrongful conduct. Their statements and conduct were intentionally deceptive, despicable, and driven by ill will.

Mr. Callagy has or will suffer special damages in at least the amount of \$4 million dollars, general damages according to proof for loss of reputation, humiliation, loss of enjoyment of life and emotional distress in at least the amount of \$2.5 million dollars, and punitive damages in accordance with proof, but in at least the amount of \$4 million dollars.