

~~CONFIDENTIAL~~ EVALUATION BY FORMER JUDGE BURKE
E. STRUNSKY OF RETIRED JUDGE LADORIS H. CORDELL'S
REPORT OF HER INDEPENDENT INVESTIGATION INTO
ALLEGATIONS OF MISCONDUCT BY VICTOR AENLLE,
SHERIFF CHRISTINA CORPUS, AND THE LEADERSHIP OF
THE SAN MATEO COUNTY SHERIFF'S OFFICE

April 24, 2025

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I. INTRODUCTION

Representative governance endures only when the mechanism for displacing an elected officer is so transparent, evidentially sound, and verifiable that it instills confidence in reversing the democratically grounded electoral process that installed the officer. LaDoris H. Cordell's *Report of Independent Investigation into Allegations of Misconduct by Victor Aenlle, Sheriff Christina Corpus, and the leadership of the San Mateo County Sheriff's Office* practically commands the San Mateo Board of Supervisors to wield the formidable authority conferred by Proposition A on March 4, 2025, and remove Sheriff Corpus. However, if the Board treats Cordell's conclusions as unassailable—embracing, without a verifiable public record, her sweeping credibility judgments of more than forty anonymous witnesses—it will deploy that exceptional power upon an evidentiary void, bypassing the procedural safeguards on which democratic legitimacy depends.

Cordell, a trailblazing jurist and widely respected civic leader whose distinguished career spans decades of judicial and public service, deserves substantial deference; nonetheless, her investigation in this particular case lacks the procedural rigor that constitutional standards of due process demand. The report's principal findings rely on anonymous, hearsay-laden statements—many funneled through a single source, Civilian Witness #3—leaving no reliable basis to weigh credibility. A striking factual error, confusing Fortune 500 brokerage CBRE with Coldwell Banker, persisted until journalists exposed it, revealing a failure of basic verification. All forty interviews occurred by telephone; none were audio- or video-recorded (absent Aenlle), none transcribed, and no contemporaneous notes have been disclosed save the recording of Mr. Aenlle. Despite this evidentiary void, Cordell renders sweeping credibility judgments about forty unnamed witnesses, without revealing their motives or connections to Sheriff Corpus. The report supplies no dates, emails, documents, or other corroboration, shielding its accusations from independent testing. In twenty-five years evaluating investigations, I have never seen a decision-maker asked to render a decision of constitutional dimension—even more so, removing an elected officer—on an investigator's unsupported assurance that every unidentified witness is entirely credible no matter what her pedigree. Such a methodology would surely falter under judicial or administrative scrutiny and cannot sustain the extraordinary remedy of ouster.

The Board of Supervisors should invoke its gravest sanction only after subjecting the Cordell Report to the full scaffolding of due-process safeguards: sworn, recorded testimony; rigorous cross-examination; public disclosure of every note and memorandum; and independent, transparent review—protections that alone can convert allegation into proof. Without them the report remains a black-box narrative, anonymous voices trapped in unrecorded interviews, credibility judgments delivered in a chamber devoid of daylight. Elevating so opaque a manuscript to dispositive authority would announce that the electorate’s mandate may be undone through procedures as shadowed as the witnesses themselves. Until adversarial testing and open scrutiny illuminate its contents, the report is procedurally infirm; it cannot underwrite a decision of this magnitude, nor withstand the corrosive effect such a precedent would have on public faith in self-government.

II. SCOPE OF THIS EVALUATION

On April 7, 2025, the law firm of Murphy Pearson Bradley Feeney retained me to conduct a narrowly focused, methodology-based evaluation of Judge LaDoris H. Cordell’s November 12, 2024 *Investigative Report Into Allegations Of Misconduct By Victor Aenlle, Sheriff Christina Corpus, And Leadership Of The San Mateo County Sheriff’s Office*.

My review is intentionally confined to the publicly released copy of Judge Cordell’s November 12, 2024 report.¹ I did not solicit—and have never been given—any underlying source material (*inter alia*: exhibits, interview notes, recordings, correspondence, or document-production requests). Outside the report itself, I consulted only two readily accessible news articles, each cited to its online, *infra* from ABC-7’s I-Team.

In sum, I was not retained to re-investigate the underlying events or to pronounce on the ultimate truth of each allegation. My sole charge is to assess whether the Cordell Report—considered in isolation—meets the standards of transparency, evidentiary rigor, and procedural fairness that due process requires before the Board of Supervisors may exercise the extraordinary authority, conferred by Proposition A, to remove an elected sheriff. My recommendation is remarkably simple: give Sheriff Corpus due process that matches the magnitude of the action being contemplated.

¹ Downloaded from: <https://padailypost.com/wp-content/uploads/2024/11/CORDELL-REPORT-.pdf>

III. EXPERIENCE AND BACKGROUND

For 25 years I have served at almost every level of California's justice system—charging, trying, and judging some of the state's most consequential cases. As an Assistant District Attorney in San Francisco and later a Deputy District Attorney in Riverside County, I took more than 100 felony jury trials to verdict with a 97% conviction rate. I tried and made filing decisions on thousands of violent-crime matters: homicides and attempted murders; sexual, child-, and elder-abuse prosecutions; cartel killings; home-invasion robberies; gang shootings; human-trafficking and child-exploitation schemes; hate-crime assaults; arsons; felony stalking; extortion; terroristic threats; and complex fraud.

Mid-career I was tapped for the office's paramount Homicide Team, an elite unit that assumed every murder investigation—often within hours of the victim's death—and carried each case from crime scene to sentencing. Working shoulder-to-shoulder with detectives, forensic scientists, and victim advocates, I shaped evidence-collection strategy, executed emergency search warrants, coordinated survivor and eyewitness interviews, and crafted the narrative that ultimately persuaded juries. Guiding a case from first call-out to final judgment sharpened my mastery of forensic science, digital evidence, and expert testimony while honing the disciplined credibility assessments that remain central to my practice. I also supervised investigations of officer-involved shootings—issuing charging recommendations when appropriate—and oversaw broader misconduct inquiries, producing comprehensive reports that informed subsequent proceedings.

Experience taught me that credibility is often case-dispositive, so I insisted on face-to-face interviews whenever possible—body language and demeanor convey more than half of human communication. I debriefed cooperation-seeking suspects, vetted would-be witnesses, and coached detectives on interview tactics while preparing grand-jury presentations and courtroom examinations. As a filing deputy and later a team leader, I reviewed thousands of police reports each year and decided whether charges—from misdemeanors to death-penalty homicides—should be filed, amended, or rejected. That front-line work demanded fluency in witness evaluation, forensic science, digital forensics, and complex expert testimony; I translated technical findings for juries and neutralized opposing experts when their science faltered or misled. I also drafted and executed hundreds of search warrants and directed specialized investigative teams probing officer-involved shootings and public-integrity cases.

Elected to the Riverside County Superior Court in 2016, I managed a high-volume docket spanning felony criminal, juvenile, civil, family, dependency, probate, and complex-litigation cases. I ruled on evidentiary and suppression motions; habeas petitions and constitutional challenges; civil-rights suits and sprawling discovery disputes; guardianships, conservatorships, adoptions, and dependency proceedings; mental-competency findings, sentencing issues, and a wide spectrum of pre- and post-trial motions—each demanding rigorous assessment of witness credibility, documentary proof, and burdens of persuasion. Concurrently, the Governor appointed me to the Judicial Selection Committee, where I collaborated and led confidential background investigations of would-be judges, interviewed attorneys, jurists, former clients, complainants, and community stakeholders, and produced analytical reports that guided gubernatorial appointments.

Today, as Special Counsel at Glenn Agre Bergman & Fuentes, I steer high-stakes litigation from strategy and discovery through depositions, trial, and appeal—handling complex and governmental investigations; white-collar and fiduciary-duty matters; business and contract disputes; fraud and unfair-competition claims; and constitutional and civil-rights actions.

IV. GENERAL CONCERNS

A. Blackbox: Source of Witnesses Interviewed

Cordell writes that she “interviewed 40 current and past sworn and civilian employees of the Sheriff’s Office—precisely 25 sworn and 15 civilians—the great majority of whom were complainants” (Cordell Report p. 4). It is unclear to this reviewer if these 40 individuals interviewed included other specific names referenced in the report.² Beyond these aggregate figures, however, the report supplies no specific information about how those 40 names surfaced, who identified them, or what criteria governed their selection. It is unclear whether County Counsel furnished the list, whether Cordell solicited volunteers, or whether she undertook any

² Max Szabo, civilian adviser, San Mateo County transition team; Ryan Monaghan, Assistant Sheriff, San Mateo County Sheriff’s Office; Chris Hsiung, Undersheriff, San Mateo County Sheriff’s Office; Dan Perea, Undersheriff, San Mateo County Sheriff’s Office; Carlos Bolanos, former Sheriff, San Mateo County; Iliana Rodriguez, Assistant County Manager, San Mateo County; Lisa Yapching, Classification & Compensation Manager, San Mateo County HR; Joann Lov, internal HR analyst, San Mateo County Sheriff’s Office; Ed Barberini, Chief of Police, City of San Mateo.

independent effort to locate sources who might hold views favorable to—or at least neutral toward—the Sheriff’s Office.

Cordell’s Report offers no rationale or context for omitting the uncited interviews, leaving readers unable to determine whether their accounts were deemed irrelevant, insufficiently credible, or merely inconvenient to the report’s thesis. Notably, Civilian Witness #3 was referred to more frequently than all the other anonymous witnesses combined (as cited above and in a footnote below and *infra*).

Cordell’s report is a black box. Except for Mr. Aenlle, every interview was conducted off-camera, not in person, unrecorded, and undocumented; every credibility judgment rests exclusively on Cordell’s untestable word³; almost all of the witness are given an anonymous number or moniker; and nearly half of the forty interviewees are not mentioned even once in Cordell’s report without explanation. With no tapes, transcripts, contemporaneous notes, or underlying documents, neither the Board of Supervisors nor any court can replicate a single factual finding, probe a single recollection, or trace a single quotation to its source. That level of opacity defies the most basic norms of credible fact-finding, where the ability to review, challenge, and verify evidence is not a luxury but the bedrock of due process.

B. Baseline Best Practices for Conducting Interviews

Modern investigative literature speaks with near unanimity: when an inquiry abandons even a single basic safeguard—such as recording interviews, meeting witnesses in person, or allowing witnesses to review their statements—unnecessary doubt inevitably seeps in. When, as appears true of the Cordell investigation, most of those guardrails are stripped away, decision-makers are left with little more than an investigator’s unreviewable recollection and sweeping credibility claims.

I certainly recognize that no investigation can follow every best-practice to the letter, and practical constraints sometimes justify thoughtful departures. My critique therefore does not hinge on any single lapse but on the cumulative pattern of unrecorded interviews, undocumented witness selection, and uncorroborated hearsay. It is this aggregate shortfall—rather than a

³ This report should not be interpreted to imply any level of dishonesty or lack of credibility on the part of Judge Cordell. In fact, this Reviewer has great respect for Judge Cordell and her distinguished career, public service, and groundbreaking accomplishments.

hindsight “Monday-morning quarterback” of individual choices—that raises doubts about the investigation’s overall reliability.

Nine practices that contemporary investigators should follow, which Cordell may not have, are listed below, along with the sources of the protocols cited:

1. Create an objective, contemporaneous record (audio or video)

Recording preserves exact words, tone, and cadence; it eliminates later disputes and allows independent reviewers to assess credibility. *Sources: U.S. Department of Labor, Office of Enforcement Manual, ch. 3 § B(3) (2023), available at <https://www.dol.gov/sites/dolgov/files/WHD/about/FLSA/foh/Chapter3.pdf>; American College of Trial Lawyers, “Recommended Practices for Conducting Internal Investigations,” p. 8 (2020), available at <https://www.actl.com/docs/default-source/default-document-library/publications/task-force-reports/recommended-practices-for-conducting-internal-investigations.pdf>.*

2. Interview in person whenever feasible:

Telephone or virtual sessions forfeit non-verbal cues—eye contact, posture, micro-expressions—long recognized as vital to gauging sincerity. *Source: International Association of Chiefs of Police (IACP), “Best Practices Guide for Internal Affairs,” p. 9 (2018), available at <https://www.theiacp.org/sites/default/files/2018-08/BP-InternalAffairs.pdf>.*

3. Use at least two trained investigators or employ an independent peer reviewer:

Dual-observer models curb unconscious bias and allow immediate cross-checking of notes, boosting reliability. *Cited in ACTL, “Internal Investigations,” p. 7 et seq. (see ACTL URL above).*

4. Provide witnesses a chance to review and adopt their statements:

Furnishing a verbatim transcript (or recording) lets witnesses correct or clarify, locking in testimony and minimizing later disputes. *Source: U.S. Department of Labor Manual, ch. 3 § B(4) (2023), URL above.*

5. Preserve all raw materials and maintain an auditable chain of custody:

Notes, drafts, exhibits, recordings, and metadata must be retained so subsequent reviewers can verify findings. Destruction or withholding of underlying materials is a

red flag. *Source: IACP, “Best Practices Guide for Internal Affairs,” pp. 8-9 (2018), URL above.*

6. Document investigative methodology in writing:

Memorialize how witnesses were selected, interview logistics, who was present, documents shown, and any limitations. Transparency enables later decision-makers—and courts—to assess sufficiency. *Discussed throughout ACTL and IACP guides (see URLs above).*

7. Avoid leading or compound questions and disclose exculpatory information:

Neutral, open-ended questioning elicits uncoached narratives; withholding contrary facts until late in the interview tests spontaneous recall and deters tailored answers. *Source: California Commission on Peace Officer Standards and Training (POST), Learning Domain 25 — Interview & Interrogation (current edition), available at https://post.ca.gov/Portals/0/post_docs/publications/LD25.pdf.*

8. Re-interview key witnesses when new evidence emerges:

Significant inquiries often span months; responsible investigators reconvene witnesses if later-discovered documents, emails, or texts shift the factual landscape. *Source: ACTL, “Internal Investigations,” p. 11, URL above.*

9. Separate credibility analysis from fact narration and articulate the basis:

Credibility findings should rest on identifiable factors—corroboration, motive, demeanor, prior inconsistent statements—rather than conclusory assertions. *See ACTL, pp. 9-10; IACP, p. 12.*

C. Hyperbolic Tone-Setting Excerpts from the Cordell Report

Cordell’s opening salvo—“*Lies, secrecy, intimidation, retaliation, conflicts of interest, and abuses of authority are the hallmarks of the Corpus administration...Nothing short of new leadership can save this organization*” (Cordell Report p. 2)—is not merely colorful prose; it is a sweeping legal conclusion delivered before any evidence is laid out. An investigator billed as “independent” is expected to gather verifiable facts and present them neutrally, leaving ultimate judgments to the decision-maker. By calling for the Sheriff’s removal on page two, Judge Cordell assumes the adjudicative role that Proposition A reserves to the Board of Supervisors, collapsing the line between fact-finder and advocate. That rhetorical choice invites readers to accept the aphorism and skim past the hundreds of pages of hearsay-based allegations that

follow, thereby skewing the Board’s ability to engage in the sober, granular analysis the statute requires.

Early, absolutist language also signals confirmation bias: once an investigator announces that an agency is “in utter disarray” and “obsessed with loyalty that borders on paranoia” (Cordell Report pp. 91-92), every subsequent datum risks being interpreted to fit the thesis. The danger is magnified here because the record is opaque—interviews were unrecorded, witnesses remain anonymous, and no contemporaneous notes are provided (Cordell Report p. 4). With no way to test tone, context, or leading questions, the Board must rely entirely on the investigator’s credibility calls; incendiary rhetoric grafted onto an unreviewable record converts untested assertions into quasi-facts.

Finally, the report’s advocacy posture exceeds the undefined mandate under which it was commissioned and jeopardizes the due-process architecture built into Proposition A. The charter amendment contemplates a written statement of charges, an opportunity for sworn testimony, and a public hearing before the Board exercises its extraordinary power to remove an elected Sheriff. If the Board were to treat Cordell’s hyperbolic judgments as dispositive, it would invert that sequence—punishment first, evidence later—inviting legal challenge and undermining public confidence in the removal process. A truly independent report would have reserved such ultimate conclusions for the Board, after a transparent evidentiary hearing, rather than foreclosing deliberation with sweeping rhetoric at the outset.

D. Gendered Double Standards in Allegation #1

The Cordell Report’s most sensational allegation—that Sheriff Corpus and Executive Director Aenlle carried on an “intimate relationship” so corrosive it crippled the Sheriff’s Office—rests on little more than single-sourced hearsay. The narrative is stitched from a handful of vignettes: three fleeting text messages, one alleged hallway kiss, an ambiguous Zoom screen, talk of Tiffany earrings and a Maui wedding, and a few late-night departures. Every detail traces back to a single source—“Civilian Witness #3.” No emails, travel logs, financial records, photographs, or independent witnesses corroborate any of it. Nevertheless, the Report inflates these fragments into the sweeping conclusion that Sheriff Corpus “relinquished control” of a 1,100-employee agency to a civilian aide (Cordell Report p. 19). A substantial research record shows that women leaders are often judged through a sexualized lens that reframes routine workplace conduct as romantic or improper; identical behaviors are sexualized

sooner and condemned more harshly for women than for men (Eagly & Karau, “Gender and the Emergence of Leaders: A Meta-Analysis,” *Psychological Bulletin* 109: 233-256 (1991); Heilman & Parks-Stamm, “Gender Stereotypes in the Workplace,” *Research in Organizational Behavior* 24: 47-94 (2007); Ridgeway, “Framed Before We Know It: How Gender Shapes Social Relations,” *Gender & Society* 17: 129-150 (2003); Catalyst, *The Double-Bind Dilemma for Women in Leadership* (2007)). These patterns do not dictate the outcome of any single case, but they underscore why robust corroboration is essential before converting unverified impressions into formal findings—especially when the target is the county’s first woman and first Latina Sheriff.

Fundamental investigative practice—and basic due-process norms—require contemporaneous documents or multiple independent witnesses before recommending a remedy as drastic as removal of an elected constitutional officer. The Cordell investigation supplied neither. By elevating a lone witness’s untested perceptions to fact, the Report substitutes inference for proof and fuels the perception—grounded in decades of gender-bias research—that identical conduct is scrutinized far more suspiciously when the actor is a woman, especially once allegations of workplace romance enter the frame. This “intimate relationship” finding is the keystone for the Report’s later conclusions on conflicts of interest, retaliation, and abdication of command; when the keystone is shaky, every arch it supports is unsound. Recommendations as extraordinary as ousting an elected Sheriff must rest on rigorous, objective evidence—not conjecture spun from a single, uncorroborated source.

E. Single-Investigator Credibility Findings Cannot Justify Overturning an Election

The Board of Supervisors is being urged to invoke the most drastic remedy the county charter permits—nullifying the electorate’s choice and expelling a constitutional officer—on nothing more than a single investigator’s un-reviewable assurance that forty unnamed accusers “were credible.” Judge Cordell recorded none of her forty interviews (absent Aenlle), appears to have kept no verbatim notes, and concealed most witness’s identity. Without tapes, transcripts, or even contemporaneous memoranda, neither the Board nor a court can compare tone, context, or possible leading questions, let alone test the accounts for exaggeration, misunderstanding, or fabrication (Cordell Report p. 4). The blanket statement that “all witnesses were credible” is therefore no evidence at all; it is the kind of ipse dixit that collapses under its own weight.

Because every credibility call rests with a single, interested evaluator, time-honored safeguards—second-reader review, panel deliberation, and adversarial cross-examination—never occurred. Well-established guidance for high-stakes investigations, from DOJ internal-affairs standards to corporate-governance treatises, warns that unchecked, one-person credibility determinations invite unconscious bias and confirmation error. Those risks become intolerable when the consequence could be overturning an election. Worse still, the narrative is driven by one anonymous witness: “Civilian Employee #3” is cited more than a dozen times and supplies the report’s most incendiary claims, yet public reporting shows she vowed to “take [Sheriff] Corpus down” after being denied a promotion (ABC7 I-Team Mar. 6 2025). The investigation hides the witness’s motive, demeanor, and lack of corroboration, leaving the Board nothing to probe. In short, absent recordings, disclosed identities, or articulated credibility metrics, the report offers only the investigator’s say-so—the antithesis of due process. Courts routinely overturn administrative findings built on such an undeveloped record, and the Board should demand at least that much rigor here.

F. Chronology and Causation Blurred

Section 412.5, added to the San Mateo County Charter by Proposition A, empowers the Board of Supervisors to remove a sheriff only for causes “related to the performance of the sheriff’s duties” and only after written notice and a hearing. That phrasing presumes the person is already in office and performing those duties; events that occurred before the January 2023 swearing-in simply cannot be “related” to them. (San Mateo County Charter § 412.5(a)).

The report blends pre and post-inaugural events and at points attributes Mr. Aenlle’s conduct to Sheriff Corpus without explaining how—if at all—she directed or approved it. Proposition A permits removal only for “cause” that arises from the Sheriff’s own performance after taking office. Unless the chronology is disentangled and individual roles are kept distinct, the Board cannot know which facts, if any, constitute post-inaugural misconduct by the Sheriff herself. Separating timelines and actors is therefore essential both to inform the Sheriff of the precise charges and to satisfy fundamental due-process protections.

G. Compounded Methodological Weaknesses

When hearsay dependence, anonymous sourcing, single-investigator credibility rulings, unrecorded interviews, and expansive causal inferences are combined, the methodological fragility of the report becomes apparent. Removal of an elected official is a direct intrusion on

the electorate's choice; the underlying investigation must therefore meet the highest standards of objectivity, clarity, transparency, verifiability, and ability to recreate. In its current form, the Cordell Report does not furnish the Board of Supervisors with evidence sufficiently robust to justify such a consequential constitutional action.

V. WHY THE SHERIFF'S OFFICE POLICY MANUAL CANNOT LAWFULLY BE APPLIED TO SHERIFF CORPUS

The San Mateo County Sheriff's Office Policy Manual declares that it is directed to "Sheriff's Office employees" and assigns duties to subordinate ranks—captains, lieutenants, sergeants, deputies, and civilian staff—who operate within a supervisory chain of command. (Sheriff's Office Policy Manual, §§ 1025.1, 200.3, 201.1-.2.) Those provisions explain that "Captains and Directors assist the Undersheriff and Assistant Sheriff in carrying out Sheriff's Office policies; administer and supervise work," language that presupposes an employer-employee hierarchy and excludes the Sheriff from the Manual's functional scope.

The Sheriff, by contrast, occupies an independent constitutional office filled by county-wide election. Article XI, section 1, subdivision (b) of the California Constitution authorizes counties to elect a sheriff, and Government Code section 24000 places that office on the roster of county constitutional officers. Because the Sheriff derives authority directly from the electorate—not from appointment or contract—the Policy Manual, drafted for departmental employees, does not govern the Sheriff's official conduct.

A. The Sheriff Is a Constitutional Officer, not a Departmental Employee or Member

California statutory text mirrors a century of case law distinguishing county officers—whose authority flows directly from the electorate or the Constitution—from county employees who serve at will. The Meyers–Milius–Brown Act expressly removes elected officials from its bargaining framework by defining a "public employee" as any county worker "excepting those persons elected by popular vote." (Gov. Code, § 3501, subd. (d).) Consistent with that exclusion, Government Code section 24001 provides that county officers "shall not be deemed employees of the county," a separation the Legislature has replicated in the Public Employees' Retirement Law, which omits "officers elected by ... popular vote" from the definition of "employee." (Gov.

Code, § 20322, subd. (a).) The Labor Code likewise declares that an “elected paid public officer” is not an “employee” for workers-compensation purposes. (Lab. Code, § 3351, subd. (b).)

California courts enforce the same bright line. In *Mono County v. Industrial Accident Commission* (1917) 175 Cal. 752, the Supreme Court held that an elected sheriff “is not an employee within the meaning of the Workmen’s Compensation Act,” because a public office “is not held by contract” and owes its existence to the Constitution rather than to any hiring authority. Subsequent cases uniformly treat elected officers as holders of office, not employees, for purposes ranging from wage-and-hour statutes to collective bargaining.

Collectively, these enactments and precedents remove the Sheriff from the class of persons whom county HR instruments—including the Lexipol Policy Manual—can regulate. The Manual’s provisions apply only to “employees” (Policy Statement, p. 1), a term that cannot be stretched to encompass a constitutional officer whom the voters, not the County, have installed. Because Sheriff Corpus occupies an office defined by article XI, section 1(b) of the California Constitution and filled by county-wide election, she stands outside the employment hierarchy addressed by departmental policies. Those policies therefore cannot supply the legal yardstick for judging her conduct; any restraint on her authority must come from the Constitution, applicable statutes, or duly enacted ordinances—not from internal HR rules drafted for subordinate personnel.

B. Specific Language in the Policy Manual Confirms Non-Applicability to the Sheriff

The Manual states that supervisory personnel “assist the Undersheriff and Assistant Sheriff” in implementing policy, illustrating a subordinate hierarchy incompatible with the Sheriff’s independent status. (Sheriff’s Office Policy Manual, § 201.1(d).) It further provides that requests for outside employment, pay, or discipline require the Sheriff’s approval, underscoring that the Sheriff is the ultimate authority, not an employee subject to oversight. By its own terms, therefore, the Manual regulates subordinates, not the constitutional officer who issues and enforces it.

C. Public Policy Supports Distinct Standards for Elected Officers

Democratic accountability flows directly from the ballot box. Employee manuals, by contrast, are management tools written for staff who serve within an internal chain of command. If those manuals were applied to an elected Sheriff, unelected administrators could second-guess

the voters' choice except where the Charter or state law expressly allows. That result would blur the constitutional line between popular sovereignty and routine personnel oversight.

This institutional distinction is not a license to ignore legal or ethical norms. The Sheriff remains fully subject to statewide conflict-of-interest statutes—such as Government Code section 1090 and the Political Reform Act—as well as the Penal Code, Government Code, and the County Charter. The point is simply that rules drafted for employees cannot be stretched to cover an independent constitutional officer unless the Board formally legislates that extension.

Because the Policy Manual's conflict-of-interest provision was written for deputies and civilian staff, it does not, by its own terms, govern the elected Sheriff. Any evaluation of Sheriff Corpus's conduct must therefore rest on legal authorities that indisputably bind elected officials, not on an internal handbook directed at subordinates.

VI. EVIDENCE OF AFFAIR

Virtually every detail that Cordell cites as proof of an affair originates with a single source—Civilian Employee #3—and remains entirely uncorroborated. No screenshots, receipts, e-mail chains, Signal logs, hotel records, surveillance footage, or contemporaneous notes have been produced to verify her account of “*Baby, I love you*” texts, a “peck on the lips,” late-night outings, or the alleged \$12,000 Tiffany-earring purchase. Both Sheriff Corpus and Mr. Aenlle expressly deny any intimate relationship, and nothing in the record independently contradicts those denials.

The handful of remarks attributed to other employees (e.g., a private weapons-range session, Mr. Aenlle's overheard “*Te amo*,” or parking in the Sheriff's reserved spot) do not, on their face, establish romance or impropriety. At most they show access, not intimacy.

Significantly, Cordell's report contains no documentary exhibits—texts, photographs, receipts, or audio—that directly substantiate Civilian Employee #3's narrative. In short, the affair allegation rests on a single witness's recollection, unsupported by documents or corroborating testimony. Given these evidentiary gaps and the unequivocal denials from both principals, the claim of an intimate relationship remains unproven. Here is a chart laying out the entirety of the evidence Cordell cites to support the existence of an affair.

Alleged Fact	Source cited by Cordell	Documentary Evidence Produced?	Cordell Report page no.
"Baby, I love you, I miss you so much" text on Sheriff's phone	Witness #3	None	12
Peck on lips in Millbrae office	Witness #3	None	12
Zoom call: feeding each other / "footsie" at ranch	Witness #3	None	13
Request to plan Maui wedding sites	Witness #3	None (Signal messages not produced)	14
\$12,000 cash for Tiffany earrings; Sheriff shows earrings	Witness #3	Link to web ad only; no receipt or message	14
Christian Louboutin boots bought by Aenlle	Witness #3	None (receipt only seen by witness)	14
"Practicing a lot to have kids" remark	Witness #3	None	14
Late night departures together; husband upset	Witness #3	None	15
Election night quarrel ("How dare you thank...")	Witness #3	None	15
Range qualification in private session	Sworn employee #30	Qualification sheet disputed; no affair evidence	12
"Te amo" overheard on phone	Civilian employee #6	None; hearsay only	18

VII. ALLEGED RACIAL SLUR

The Cordell Report rests its likely most morally reprehensible accusation of racist language on a single source: Civilian Witness #3, who claims that during a muted Zoom meeting in January or February 2022—well before Sheriff Corpus assumed office—she twice whispered the “n-word” while looking at the screen (Cordell Report p. 90). No recording exists; no other participant heard anything; and no contemporaneous note, email, or text message supports the account. Among forty interviewees—many of whom are openly hostile to the Sheriff—not one person corroborates the alleged remark (Cordell Report p. 90).

The only documented incident in the Report that directly involves racist language points in precisely the opposite direction. Within months of taking office, Sheriff Corpus ordered that a deputy who used a racial slur on body-worn video be fired rather than permitted to resign, a decision the Report details on page 29 (Cordell Report p. 29).

Accepting Witness #3's story would therefore require believing that a Sheriff who had just imposed the harshest penalty for a subordinate's slur privately uttered—and repeated—an even more deplorable epithet with no witness but Civilian Witness #3 and no trace of documentation. Nothing in Sheriff Corpus's long public record—spanning decades in law enforcement under constant scrutiny—shows even a hint of racial hostility. The notion that she would suddenly, and for the only time in her career, whisper the most incendiary slur in the English language during a muted Zoom call strains credulity. Yet Cordell treats the accusation as established fact, discarding the complete absence of corroboration and the Sheriff's documented discipline of subordinates for bigoted speech. To accept so thin a reed as proof would normalize the removal of elected officials on the strength of a lone, unverified allegation—an alarming precedent that threatens both due process and democratic accountability.

VIII. ALLEGED HOMOPHOBIC SLUR

Civilian Witness #3 says an incident began during the 2022 campaign, when she and Captain Corpus were (working together to get Sheriff Corpus elected) exchanging messages about politics and local personalities. According to her, on July 13, July 25, and August 15 of that year, Corpus sent her the same text describing a lesbian city-council member as a “FuzzBumper.” More than two years later, when Cordell's investigation was under way, Witness #3 produced three cropped screenshots that displayed only the disputed word and a first name—no date stamp, no sender information, no surrounding messages, and no phone metadata. Exhibit 46 contains nothing else.

To be clear, any language that demeans or disparages someone on the basis of sexual orientation is unacceptable and has no place in professional or personal discourse; however, this allegation rests on the uncorroborated account of a single witness and concerns a public official who has never previously been reported to have uttered any such slur in any context. The narrow question is therefore whether this scant evidence suffices to establish a violation of the County's EEO policy.

The problem is that Civilian Witness #3’s credibility is badly compromised. ABC 7 obtained an interview with a Millbrae official who says that, after Corpus took office and did not promote her, Civilian Witness #3 told him on at least a dozen occasions that she intended to “take [the Sheriff] down” and would “do anything” to make that happen (ABC7 I-Team report, March 6, 2025).

The Cordell Report says nothing about Witness #3’s motives or her past relationship with Sheriff Corpus. It also omits the fact that she was once a public cheerleader for Corpus’s election campaign and later an outspoken champion of Proposition A—a complete, unexplained reversal of loyalty that bears directly on her credibility.

When ABC 7 confronted Sheriff Corpus with the screenshots of the above texts, she flatly denied authorship: “It’s not my text; I did not send that. I had to look up what that term meant.” (ABC7 I-Team report, March 6, 2025⁴)⁵ The investigation did not test that denial. The specifics of any device examination were not exposed or shared, no expert linguistic analysis, and no attempt to place the sheriff’s phone at the times the messages were allegedly sent. Nor did any of the over forty other witnesses interviewed by Cordell recall ever hearing Corpus use homophobic language.

Thus the entire allegation hangs on one compromised witness, three unverified screenshots, and an obscure phrase whose offensive meaning is asserted but not demonstrated. The investigative steps that could have confirmed or disproved authorship were never taken; the potential bias of the sole accuser was never explored; and the leap from ambiguous, unauthenticated images to an official finding of discriminatory conduct was made without independent proof. In a matter carrying reputational stakes this high, the evidence offered is simply too thin to sustain the charge.

IX. AN ABBREVIATION MIX-UP AND ITS CONSEQUENCES

Cordell mistakenly equated the initials “CBRE” on the June 15 2023 Letter of Intent with “Coldwell Banker Real Estate.” Building on that misidentification, she asserted that Coldwell Banker brokered the Broadway lease, proclaimed that Victor Aenlle’s denial “stretches

⁴ <https://abc7news.com/post/exclusive-key-witness-get-san-mateo-county-sheriff-christina-corpus-credibility-questioned-public-official/15981419/>

⁵ To be clear, Sheriff Corpus did not agree to the interview despite being given several dates by Corpus (Cordell Report pp. 4,5).

credulity,” and told the Board the deal was “likely a lucrative one for Coldwell Banker” (Cordell Report pp. 68–72). This single factual error underlies her entire conflict-of-interest finding and, as shown below, exemplifies the investigative shortcuts that run through her 380-page report.

Before making that leap, Cordell questioned Aenlle in a manner that plainly signaled she thought he was lying. She pressed, “So my question to you is did you know that *Coldwell Banker* was the broker for this lease?” and, moments later, declared, “There were three individuals who were the brokers for this lease, and they are people who *work for Coldwell Banker*” (Ex. 1 to Cordell Report pp. 35–36). Despite Aenlle’s repeated answer—“Ma’am, I don’t think that is correct” and “I never met Mr. McSweeney before in my life”—Cordell returned to the theme, telling him that his denial “stretches credulity.” Those exchanges show she had already adopted the Coldwell Banker theory and was inviting the witness either to confirm it or to appear dishonest.

In reality CBRE⁶ is the Fortune-500 commercial firm CB Richard Ellis⁷, a company entirely unrelated to Coldwell Banker. A rudimentary Google search or a telephone call to the broker named in the lease—Bob McSweeney—would have revealed the distinction; when contacted by ABC-7’s I-Team he confirmed the firms are “totally different companies” and that he had never met Aenlle. Cordell never undertook those basic steps, never secured the recorded lease herself, and excluded 29 pages of Aenlle’s interview transcript that contained his strongest denials. After months of follow-up she conceded to the Mercury News on December 2, 2025 (12:34 a.m.) that she was wrong about the broker, yet she insisted the error “does not change any conclusion” in her report.

The CBRE-versus-Coldwell-Banker blunder is not a trivial footnote—it is a window into the report’s larger investigative breakdown. Judge Cordell sustains Allegation #6 on the assertion that “CBRE” stands for “Coldwell Banker Real Estate,” inferring that Victor Aenlle secretly brokered the Broadway lease for his own firm and thus had a financial conflict (Cordell Report pp. 68, 71). A thirty-second search reveals CBRE is an unrelated Fortune-500 company, yet this basic misidentification—visible on the very Letter of Intent the investigator cites—went uncorrected even after public scrutiny. Because that error supplied the predicate for branding Aenlle “not credible,” its persistence exposes a methodology that pronounces grave conclusions

⁶ <https://www.cbre.com/about-us>

⁷ <https://www.coldwellbanker.com>

before verifying elementary facts, records only select interviews, and credits anonymous hearsay over documentary confirmation. If such a glaring mistake survived the report’s quality controls, every unrecorded, uncorroborated claim resting on those same controls is cast into doubt—fatally undermining the reliability required to justify removing a constitutionally elected Sheriff.

X. ALLEGATION OF ABUSE OF AUTHORITY

Cordell asserts that Sheriff Corpus allowed Victor Aenlle to “move himself to the top of the Chain of Command,” exercising authority over sworn and civilian personnel with the Sheriff’s blessing (Cordell Report p. 25). Yet the record she provides does not sustain that charge, nor does it untangle what Aenlle actually did from what staff merely perceived.

To begin, Cordell points to no order, memo, or organizational chart showing Aenlle formally placed “at the top” of the command structure. Indeed, she concedes that no finalized chart even existed during her investigation (Cordell Report p. 6). In the sole recorded interview, Aenlle himself characterizes his status as “civilian staff,” explaining that the Undersheriff—not he—was drafting the chart still in progress (Ex. 1, Aenlle Transcript). That admission cuts against any suggestion of an official re-alignment elevating him above sworn leadership.

Cordell next relies on anonymous, unrecorded statements that Aenlle “inserted himself” into press releases, briefings, and personnel meetings (Cordell Report pp. 27-30). But those anecdotes are untethered to dates, documents, or corroborating witnesses. She furnishes no emails, directives, or minutes showing that Aenlle issued orders, overruled sworn commanders, or otherwise exercised coercive power. Nor does she identify a single instruction from Sheriff Corpus delegating such authority.

The only concrete paperwork is Aenlle’s extra-help appointment as Executive Director of Administration (Ex. 11 to Cordell Report). That job description covers strategic planning, logistics, and interagency coordination—functions routinely handled by civilian chiefs of staff in other law-enforcement agencies. It confers no operational command over deputies.

Ultimately, Cordell substitutes staff impressions of influence for evidence of abuse. She never articulates a legal or policy standard defining “abuse of authority,” yet declares the standard breached. Absent a benchmark, the conclusion is necessarily subjective; organizational discomfort is not misconduct.

In sum, the allegation rests on a vague, undocumented foundation. There is no written delegation vesting Aenlle with command powers, no proof that he exercised them, and no cited

rule that would render his civilian role unlawful. At most, the Sheriff may be faulted for unconventional staffing or poor internal communication—hardly the constitutional predicate for removal under Proposition A. The claim therefore falls well short of the due-process and evidentiary threshold required for so extraordinary a sanction.

XI. BADGE ISSUE

Penal Code § 538d addresses fraudulent impersonation, not badge color or rocker size. Subdivision (a) forbids wearing any peace-officer indicia “with the intent of fraudulently impersonating a peace officer,” and subdivision (b)(2) makes it a misdemeanor to display a badge that would deceive “any ordinary reasonable person” if accompanied by that fraudulent intent (Pen. Code § 538d, subs. (a), (b)(2)). Two published Attorney-General opinions confirm that the statute turns on deception and intent: the 2007 opinion invalidates honorary badges only when they are likely to fool the public (90 Ops.Cal.Atty.Gen. 57 (2007) at 64-66), while the 2009 opinion expressly authorizes badges for non-sworn employees with limited powers so long as the badge accurately states the bearer’s role (92 Ops.Cal.Atty.Gen. 46 (2009) at 49-50).

Victor Aenlle’s badge satisfies San Mateo County Sheriff’s Policy 1026.2.2, which requires that civilian badges “be clearly marked to reflect the position of the assigned employee”; his rocker reads “Chief of Staff,” plainly identifying him as a civilian executive (Sheriff’s Policy Manual § 1026.2.2, p. 706). No witness or document indicates that Aenlle ever used the badge to detain, arrest, or compel compliance; Cordell’s sole basis is that “from a distance, it could look like” a deputy’s shield (Cordell Report p. 86). Taken literally, that yard-arm standard would outlaw every civilian or prosecutorial badge in California, because any rocker—no matter how clear—becomes unreadable at range and thus could equally “look like” a sworn badge. Without evidence of deceptive intent or actual confusion, the elements of § 538d are not met (Pen. Code § 538d, subd. (b)(2); 90 Ops.Cal.Atty.Gen. 57, *supra*, at 64).

Gold-tone badges for civilian executives are common statewide. Assistant and Deputy District Attorneys—including during my fifteen years as a prosecutor—routinely carry gold badges that resemble those of sworn deputies; the rocker identifies them as prosecutors, and no one has suggested they violate Penal Code § 538d. Whether allowing any non-sworn employee to display a police-style badge is wise policy is debatable, but the practice is widespread. Cordell’s contrary reading is, at best, pedantic. If her interpretation were correct, hundreds of prosecutors (myself included for fifteen years—see Exhibit A, photographs of my badges) would

be guilty of a misdemeanor every workday. Her collateral claim about honorary badges fares no better: the 2007 Attorney-General opinion allows volunteer or commemorative badges so long as their design and labeling prevent confusion, and the investigative record contains no evidence that the plaques, draft ID card, or unissued badges she cites could deceive an ordinary observer.

XII. CONCLUSION

Due process is the bedrock of constitutional governance; without it, even well-intentioned remedies risk eroding the electorate's faith in those who govern. As Justice Joseph Story explained in his classic *Commentaries on the Constitution*, "The impeachment power is not so much designed to punish an individual, as to secure the state against gross official misdemeanors." (3 Story, *Commentaries on the Constitution of the United States* § 795 (1833)) This evaluation therefore asks a single, threshold question: does Judge Cordell's November 12, 2024 report deliver the transparent, corroborated, and independently reviewable proof that must precede any attempt to unseat a county-wide elected sheriff? After examining the record of unrecorded telephone interviews, anonymous hearsay, and solitary credibility rulings—set against a near absence of documentary verification (Cordell Report p. 4)—the answer remains no. Under Proposition A, removal of an elected sheriff demands "cause" established through procedures that match the gravity of nullifying the electorate's choice (§ 412.5). Acting on so fragile a foundation would trade the transparency promised to voters for the opaque assurance of a single investigator—and in so doing set a precedent corrosive to every future exercise of democratic oversight.

Cordell's investigation has undeniable value—but only as the point of departure, not the destination. Her report surfaces a host of serious allegations, yet it rests on an evidentiary lattice too frail to carry the constitutional load of overturning an election: forty anonymous, unrecorded interviews (except Aenlle), apparently no verbatim notes, and blanket assertions of credibility that no independent reviewer can test. As Justice Harlan warned, "*The right to hold office, once conferred by the people, is a valuable part of the liberties of the citizen.*" (*Taylor v. Beckham*, (1900) 178 U.S. 548, 605 (1900) (Harlan, J., dissenting)) Alexander Hamilton likewise cautioned in *Federalist* No. 65 that "*The subjects of [the impeachment] jurisdiction are those offences which proceed from the misconduct of public men ... from the abuse or violation of some public trust,*" (Hamilton, *The Federalist* No. 65 (1788) (Cooke ed. 1961)), underscoring that removal must rest on proof of genuine abuse rather than political impulse. If the County were to act now,

it would substitute that liberty for an unreviewable judgment and undermine the democratic principle that the people—not a single investigator—decide who governs.

The path forward lies in neither shelving Judge Cordell’s work nor rushing to depose an elected sheriff. What San Mateo County needs—and what the charter now empowers—is a transparent, meticulously staged public hearing that converts allegation into demonstrable fact or, just as readily, into demonstrable error. In that forum, every witness must testify under oath and on the record; every interview note, email, and exhibit must be produced; every assertion must withstand exacting cross-examination; and Sheriff Corpus must enjoy an unfettered right to confront her accusers and answer each charge in full view of the electorate. Only such an architecture of due process can transform this moment of crisis into a civic exemplar—a proceeding future generations can cite as the gold standard for democratic accountability. By demanding nothing less, the Board will honor the voters who chose their sheriff and the very amendment that entrusts them with the power to remove her for cause, proving that in San Mateo County even the gravest accusations are resolved not by fiat, but by procedures so fair and transparent that they strengthen faith in self-government itself.

Respectfully Submitted,

A handwritten signature in black ink that reads "Burke Strunsky". The script is fluid and cursive, with the first letters of each name being capitalized and prominent.

Former Judge Burke E. Strunsky

EXHIBIT A



EXHIBIT B

