

# CLAIM AGAINST THE COUNTY OF SAN MATEO

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

Claimant's Name:	Dr. Victor Aenlle		
Claimant's Address:	C/O FELLNER LAW GROUP, 90 New Montgomery St., Ste. 400		
City: San Francisco	State: CA	ZIP Code: 94105	Phone: (415) 658-9253

Amount of Claim:	\$ Currently unknown.
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Address to which notices are to be sent (if different than above):

Above by mail, and also by email to [jfellner@fellnerlawgroup.com](mailto:jfellner@fellnerlawgroup.com)  
and [abrowning@fellnerlawgroup.com](mailto:abrowning@fellnerlawgroup.com).

*Hand Delivered*

RECEIVED  
IN THE OFFICE OF

MAY 2 2025

Date of incident:	11/13/2024	Location of Incident:	See Attachment 1
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CLERK OF THE  
BOARD OF SUPERVISORS

How did it occur (describe damage or loss):

See Attachment 1 for dates of incidents, location of incidents, names of public employees causing damages, and particular actions by County.

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

1. See Attachment 1

2.

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

1. Loss of earning capacity/future income & Reputational Damage	\$ 5,000,000
2. Emotional Distress	\$ 5,000,000
3. Punitive Damages	\$ 5,000,000
4. Attorney's fees, litigation costs, and indemnification for any future judgment against Claimant	\$ Amount presently unknown but increasing
<b>TOTAL</b>	\$ Amount presently unknown but increasing

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

Dated at San Francisco, California, on May 2, 20 25

Signature of Claimant:  Jason E. Fellner, Esq., Attorney for Claimant

Return to: CLAIMS, Board of Supervisors, 500 County Center, 5th FL., Redwood City, CA 94063

### **Attachment 1**

Claimant Victor Aenlle (“Mr. Aenlle”) submits this attachment in support of his Claims Against the County of San Mateo (“County”) pursuant to Government Code Section 910.

Mr. Aenlle is, and was at all times relevant to this claim, a Peace Officer under Penal Code Section 830.

Mr. Aenlle is, and was at all times relevant to this claim, a sworn Designated Level I Reserve Deputy Sheriff for the County.

Mr. Aenlle is, and was at all times relevant to this claim, a Latino-American over the age of 40.

On or about January 2023 to July 2023, the County Sheriff’s Office created the Executive Director of Administration/Chief of Staff (“Chief of Staff”) position through a comprehensive human resources process including an internal salary evaluation with comparable classifications within the County. The County Sheriff’s Office provided a recommendation to the County Board of Supervisors to adopt a salary range for the position, and the County Director of Human Resources Rocio Kiryczun, County Executive Officer Mike Callagy, and the County Board of Supervisors approved the Chief of Staff position.

On or about July 2023, the County Sheriff Christina Corpus (“Sheriff Corpus”) appointed Mr. Aenlle to the position of Chief of Staff.

On or about July 2024, County Executive Officer Mike Callagy hired retired Judge LaDoris Cordell to conduct an investigation of the Sheriff’s Office and prepare a report (“Cordell Report”), commencing a coordinated and calculated effort to discredit the Sheriff Corpus’ leadership team, including Mr. Aenlle.

In directing the creation of the Cordell Report and releasing the same, County Executive Officer Mike Callagy conspired with County Supervisors Noelia Corzo and Ray Mueller to defame, retaliate against, and remove Mr. Aenlle from his duly appointed position as Chief of Staff.

On or about September to October 2024, on two separate occasions during a meeting with Sheriff Corpus and County Director of Human Resources Rocio Kiryczun, pressured Sheriff Corpus to terminate Mr. Aenlle’s position without good cause or investigation. During those same meetings, County Director of Human Resources Rocio Kiryczun recommended placing Mr. Aenlle on administrative leave, also without good cause or investigation.

On November 12, 2024, County Supervisors Noelia Corzo and Ray Mueller held a press conference and publicly released the Cordell Report, a defamatory, incomplete, politically weaponized document without allowing Mr. Aenlle to review and respond. The Cordell Report lacked proper fact-finding and omitted crucial evidence exculpating Mr. Aenlle. Neither retired Judge LaDoris Cordell nor the County issued a corrective addendum to the Cordell Report, even after being informed of the material mistakes and findings. County Counsel John Nibbelin falsely advised the court reporter and transcript service that a protective order prevented

discovery and dissemination of the transcript of Mr. Aenlle's interview with retired Judge LaDoris Cordell, when no protective order existed.

On November 13, 2024, one day after the release of the Cordell Report, San Mateo County Executive Mike Callagy terminated Mr. Aenlle from his position at the Sheriff's office without notice, due process, fiscal justification, performance-based reasoning or the consent of Sheriff Corpus. (See **Exhibit A**, November 13, 2024 Letter from Callagy to Mr. Aenlle.)

Despite Mr. Aenlle's active Reserve Deputy status under the Sheriff's command, County Executive Officer Mike Callagy, motivated by malice, retaliation, and hostility, and designed to publicly marginalize Mr. Aenlle, barred Mr. Aenlle from County property in violation of County Ordinance Code § 2.10.080. In further violation of County Ordinance Code § 2.10.080, County Executive Officer Mike Callagy exploited his influence over County departments to target Mr. Aenlle's private property by directing an unfounded retaliatory code enforcement and Farm Labor Task Force actions at Mr. Aenlle.

County Executive Officer Mike Callagy, County Supervisors Noelia Corzo and Ray Mueller, County Director of Human Resources Rocio Kiryczun, and others targeted Mr. Aenlle for termination, public defamation, and exclusion from County property—treatment that was not imposed on similarly situated non-Latino employees. White executive staff who reported directly to Sheriff Corpus were not publicly maligned, barred from County facilities, or subjected to retaliatory enforcement actions, like Mr. Aenlle was by County Executive Officer Mike Callagy, Supervisors Noelia Corzo and Ray Mueller, County Director of Human Resources Rocio Kiryczun, and others.

As a direct and proximate result of the conduct unlawful actions and termination carried out by County Executive Officer Mike Callagy, County Supervisors Noelia Corzo and Ray Mueller, County Director of Human Resources, County Counsel John Nibbelin, and others, Mr. Aenlle has suffered significant reputational harm, adversely impacting Mr. Aenlle's future employment opportunities and earning capacity, including substantial emotional distress.

On September 22, 2024, Michael P. Callagy filed a claim against the County of San Mateo seeking damages arising from alleged conduct of Dr. Aenlle in his capacity as a Peace Officer employed by of the county of San Mateo.

On November 18, 2024, Brian Philip filed a claim against the County seeking damages arising from alleged conduct of Dr. Aenlle in his capacity as a Peace Officer employed by of the county of San Mateo.

On February 18, 2025, Carlos Tapia filed a claim against the County seeking damages arising from alleged conduct of Dr. Aenlle in his capacity as a Peace Officer employed by of the county of San Mateo.

On March 19, 2025, Ryan Monaghan filed a claim against the County seeking damages arising from alleged conduct of Dr. Aenlle in his capacity as a Peace Officer employed by of the county of San Mateo.

The claims against the County filed by Michael P. Callagy, Brian Philip, Carlos Tapia, and Ryan Monaghan trigger defense and indemnity obligations under the Under Public Safety Officers Procedural Bill of Rights Act (Government Code Section 3303, *et seq.*)

The County Counsel has refused to acknowledge the County's duty to defend or indemnify Mr. Aenlle regarding the allegations against him the claims filed by Michael P. Callagy, Brian Philip, Carlos Tapia, and Ryan Monaghan, notwithstanding that Mr. Aenlle was an employee (even when classified as an independent contractor) of the County Sheriff's Office and sued in his capacity as such. As a result, Mr. Aenlle has had to retain counsel at his own expense and pay all fees and costs to protect his interests. The County's refusal to provide defense and indemnification to Mr. Aenlle violates applicable law, including but not limited to Government Code Sections 825(a), 995, 996.4, and 3303.

Mr. Aenlle's Claims herein Against the County of San Mateo include, but are not limited to: (1) Wrongful Termination in Violation of Public Policy; (2) Retaliation (Labor Code § 1102.5); (3) Harassment/Hostile Work Environment; Abuse of Authority and Ultra Vires Conduct; (4) Violation of Due Process Rights; (5) Defamation and False Light Publicity; (6) Discrimination Based on Race, Color, and Age (Title VII, FEHA, Title VI); (7) Intentional Infliction of Emotional Distress; (8) Negligent Infliction of Emotional Distress; (9) Civil rights Violations Under 42 U.S.C. § 1983; (10) Retaliation in Violation of the California Whistleblower Protection Act (Gov. Code §§ 8547 *et seq.*); (11) Violation of POBR Rights; (12) Statutory Indemnity; and (13) Declaratory Relief.

Names of Public Employees causing damages to Mr. Aenlle herein include County Executive Officer Mike Callagy, County Supervisors Noelia Corzo and Ray Mueller, County Director of Human Resources Rocio Kiryczun, County Counsel John Nibbelin, and other unknown employees.

# **Attachment A**

**COUNTY OF SAN MATEO**  
**COUNTY EXECUTIVE'S OFFICE**

**Michael P. Callagy**  
County Executive Officer /  
Clerk of the Board

**County Government Center**  
500 County Center, 5th Floor  
Redwood City, CA 94063  
650-363-4121 T

[www.smcgov.org](http://www.smcgov.org)

November 13, 2024

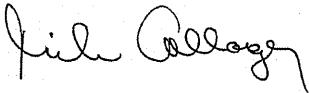
Victor Aenlle  
Sheriff's Executive Director of Administration  
San Mateo County Sheriff's Office

(Sent via email to [vaenlle@smcgov.org](mailto:vaenlle@smcgov.org) and [victor@aenllefamily.com](mailto:victor@aenllefamily.com))

Dear Victor Aenlle,

This letter is to notify you that your position of Sheriff's Executive Director of Administration-  
Unclassified has been eliminated effective today, November 13, 2024, by the Board of  
Supervisors.

You are being directed to report to the San Mateo County, 500 County Center, 1<sup>st</sup> floor, at  
4:00 p.m. on Thursday, November 14, 2024, to return all of your County issued equipment.



Michael Callagy  
County Executive

cc: Christina Corpus, Sheriff  
Rocio Kiryczun, Human Resources Director  
Civil Service and Department Personnel Files

