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June 22, 2023

Via Email & U.S. Mail

Eddie Engram, Sheriff
Sonoma County Sheriff's Office
2796 Ventura Avenue
Santa Rosa, California, 95403
Email: eddie-engram@sonoma-county.org

Re: Deputy Adam Marlowe - Request for *Skelly* Hearing
Our File No. LDF/23-0252

Dear Sheriff Engram:

I represent Deputy Marlowe in his pending disciplinary matter. On June 19, 2023, he received a notice of intent to discipline (termination). That notice directed him to submit a written or oral response to Assistant Sheriff Jim Naugle and provide a phone number of 565.1610. I have attempted, on the 19th, the 21st, and today (June 22) to contact Assistant Sheriff Naugle at that phone number to request a Skelly hearing. The result is a recording which states the number is temporarily unavailable – please try later.

Having been unable to reach Assistant Sheriff Naugle at the number provided, I am requesting that you accept this letter as Deputy Marlowe's request for a pre-disciplinary Skelly hearing involving the discipline proposed in June 19 notice referenced above. I am also requesting all documents upon which the proposed disciplinary action is based including, but not limited to, the following:

1. A copy of all policies and procedures Deputy Marlowe is alleged to have violated.

2. All reports prepared as a result of the allegations against my client.

3. All investigator notes and/or reports.

4. Any audio- or video- recordings and photographs, whether digital, color or black-and-white, used by the department to support the allegations, including my client's audio-taped interview and any other interviews.

5. A copy of any complaints made against my client that caused this matter to be initiated, including any telephone records, recordings, notes or written complaints.

6. A copy of my client's personnel file.

Thank you for your anticipated cooperation. If you would like to schedule the hearing in the meantime or if you have any questions or concerns regarding this request, please do not hesitate to contact me at 916.206.9404 or wbaird@mastagni.com.

Sincerely,

MASTAGNI HOLSTEDT, A.P.C.

WILLIAM C. BAIRD
Attorney at Law

WCB/tsd

Cc: Deputy Adam Marlowe