

LAW OFFICES OF MICHAEL J. LAMPE

108 West Center Avenue  
Visalia, California 93291  
Telephone 559.738.5975  
Facsimile 559.738.5644  
www.lampe-law.com

MICHAEL J. LAMPE  
MICHAEL P. SMITH

VIA EMAIL

March 26, 2018

Rob Hunt  
Interim City Manager  
City of Tulare  
411 East Kern Avenue  
Tulare, CA 93274

Re: Appeal of Termination of Employment  
Wesley J. Hensley

Dear Mr. Hunt:

Pursuant to his rights under the Peace Officers Bill of Rights, and §§1007 *et seq.* of the City of Tulare Merit System Rules and Regulations, former Police Chief Wes Hensley hereby appeals the Notice of Termination from Employment served by email on his attorney at 4:24 p.m. on Tuesday, March 20, 2018.

This appeal will be based on the following procedural and substantive grounds:

1. Mr. Hensley was never served with a Notice of Proposed Termination of Employment;
2. Mr. Hensley was denied a *Skelly* hearing prior to the termination of his employment;
3. Mr. Hensley was never furnished with a copy of any materials upon which the termination of his employment was based;

4. Mr. Hensley was denied both procedural and substantive due process regarding his termination;
5. The stated grounds for Mr. Hensley's termination were not true at any time prior to the termination of his employment;
6. The Notice of Termination from Employment was the product of unlawful pressure designed to obstruct justice; and
7. The Notice of Termination from Employment was the product of political corruption engaged in by certain City officials.

As you may be aware, Mr. Hensley has previously indicated that he will waive his right to privacy, and hereby demands that his Administrative Appeal be conducted in a public setting, open to both the press and interested citizens.

It is our estimate that this hearing will take three to four full days. In that regard, we currently anticipate calling the following witnesses (more may be added as we prepare for the hearing):

Former City Manager Joseph Carlini  
Mayor Carlton Jones  
Vice Mayor Maritsa Castellanoz  
Councilman Jose Sigala  
Councilman David Macedo  
Councilman Greg Nunley  
Tulare Police Department Cpl. James Kelly  
Pat O'Donohoe  
Tulare Police Department Lt. Jerrod Boatman  
Tulare Police Department Lt. Bryan Moore  
Tulare Police Department Cpt. Matt Machado  
Tulare Police Department Executive Administrative Assistant Chontelle Adney  
Community Development Deputy Director Traci Myers  
City Clerk Roxanne Yoder  
Human Resources Director Janice Avila  
Finance Director / Treasurer Darlene Thompson  
Jake Cari  
John McGinness

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Under §1008 of the City of Tulare Merit System Rules and Regulations, the hearing “shall” be conducted within 30 days of your receipt of this written appeal. Mr. Hensley does not wish to waive his right to a timely hearing, and would like for the hearing to commence not later than April 25, 2018.

We assume that the City will furnish a court reporter for the purpose of preserving witness testimony. If the City does not intend to do so, please notify my office immediately.

We also assume that the City will make witnesses under its control available to testify without the necessity of our office serving subpoenas. If the City does not intend to do so, please notify my office immediately.

If you have questions regarding the contents of this correspondence, please do not hesitate to contact my office.

Sincerely,

MICHAEL J. LAMPE  
MJL/ml  
City Attorney Heather Phillips, *et al.*