

To: Dan Johnson, City Manager

From: David Guerrero

Subject: Formal Complaint – Alleged Retaliatory Release from Part-Time Officer Position

Date: 09/04/2026

Dear Mr. Johnson:

I respectfully submit this as a **formal personnel complaint against Chief of Police Keith Traylor** concerning my release from my position as a Part-Time Police Officer with the Manvel Police Department.

I was informed that my release was the result of the upcoming **“budget cycle.”** I dispute that this was the genuine reason for my release and believe I was instead subjected to retaliation because of my association with former Patrol Captain **Chris Day**.

I am requesting that the City conduct a **formal and independent investigation** to determine the actual reason for my release, whether the stated budget cycle justification is supported by objective financial and personnel records, and whether Chief Traylor used his authority to remove me because of my actual or perceived association with Chris Day.

I. STATED REASON FOR MY RELEASE

I served the Manvel Police Department as a **Reserve Police Officer and Part-Time Officer**.

I was subsequently released, with budgetary considerations represented as the reason for that decision.

If my position was genuinely eliminated for budgetary reasons, there should be objective documentation supporting that explanation.

I therefore request that the city determine:

- What specific budgetary condition required my release.
- Who first recommended eliminating or reducing reserve staffing.
- When that recommendation was made.
- Whether the decision was documented before my release.
- Whether the City Manager, Finance Department, or Human Resources recommended or approved the action.
- Whether other reserve officers were similarly released.
- Whether reserve staffing or expenditure decreased following my release.
- Whether I was subsequently replaced, directly or indirectly.
- Whether additional reserve officers were appointed or utilized after my release; and
- Whether any records contradict the explanation that my release was necessary because of the budget.

If there was no documented budgetary need to release me, or if reserve staffing continued unchanged after my removal, that would call the stated justification into question.

II. POSSIBLE RETALIATION BASED UPON MY ASSOCIATION WITH CHRIS DAY

I believe the actual reason for my release was my association with **Chris Day**.

At the relevant time, Chris Day was President of the Manvel Police Association and was involved in circumstances that had created significant conflict between him and Chief Traylor, including an Internal Affairs investigation and discussions within the Association concerning a potential **vote of no confidence in Chief Traylor's leadership**.

I understand that Chief Traylor expressed anger concerning the Association and stated words to the effect that:

"The Association is trying to stab me in the back."

Against that background, I believe my known association with Chris Day became a factor in Chief Traylor's decision concerning my position.

I respectfully request that the investigation determine whether Chief Traylor or anyone acting in his direction discussed my relationship or association with Chris Day before the decision to release me.

The city should determine whether I was treated adversely **because I was perceived as being associated with or aligned with an employee whom the Chief viewed as an opponent or critic**.

III. THE "BUDGET" EXPLANATION SHOULD BE OBJECTIVELY VERIFIED

The stated reason for my release can be evaluated through City records.

I request review of the Police Department's budget for the applicable fiscal years, reserve-officer expenditures, payroll records, staffing documents, budget amendments, departmental communications, Human Resources records, and records concerning reserve appointments and separations.

The investigation should specifically compare the explanation provided to me with what occurred after my release.

If my release was necessary because of budget constraints, the City's financial and staffing records should substantiate that explanation.

If, however, reserve officers continued to be used, other similarly situated reserve officers were retained, reserve expenditures continued, my duties were reassigned without meaningful cost savings, or new reserve officers were subsequently appointed, those facts should be considered when determining whether **"budget" was the genuine reason or a pretext for another motive**.

IV. REQUEST FOR REVIEW OF COMMUNICATIONS

I respectfully request preservation and review of relevant communications involving Chief Traylor and other decision-makers concerning me and my release.

This should include relevant City emails, text messages, Teams communications, memoranda, notes, Human Resources communications, and other records containing or discussing:

David Guerrero, Guerrero, Chris Day, Captain Day, the Manvel Police Association, the vote of no confidence, reserve officers, reserve staffing, budget reductions, or my release from the Department.

The investigator should establish a chronology showing when budget concerns were first documented, when my release was first discussed, who participated in that discussion, and what reasons were given internally before I was notified.

That chronology may provide objective evidence of whether the budget explanation preceded the decision or was supplied afterward as justification for it.

V. POSSIBLE RETALIATION AND ABUSE OF AUTHORITY

I request that Chief Traylor's actions be evaluated under all applicable Manvel Police Department and City policies concerning **retaliation, abuse or improper exercise of authority, professional conduct, truthfulness, supervisory conduct, and treatment of employees.**

If Chief Traylor used his authority to remove a Reserve Police Officer because of that officer's personal or professional association with Chris Day, rather than for a legitimate operational or budgetary reason, I believe that conduct would warrant formal investigation and appropriate corrective action.

Likewise, if the investigation establishes that the stated budget explanation was knowingly inaccurate or was used to conceal a retaliatory purpose, which should be separately evaluated under applicable standards concerning **truthfulness, integrity, and supervisory authority.**

VI. REQUEST FOR AN INDEPENDENT INVESTIGATION

Because this complaint concerns the Chief of Police personally, I respectfully request that:

1. This complaint be assigned to be a formal **complaint or Internal Affairs control number.**
2. The investigation be conducted by an **independent investigator outside Chief Traylor's chain of command.**
3. Chief Traylor has no role in selecting the investigator or determining the investigative findings.
4. All relevant electronic and documentary evidence be immediately preserved.

5. The investigator establishes the actual financial justification, if any, for my release.
6. My treatment be compared with that of other reserve officers.
7. The investigator determines whether my association with Chris Day was discussed or considered.
8. Relevant communications concerning me, Chris Day, the Police Association, reserve staffing, and the claimed budget issue be reviewed.
9. Each potential policy violation is separately identified and a finding made as to each allegation.
10. I receive written notice of the investigation's findings and final disposition.

VII. PROTECTION OF WITNESSES

I also request that witnesses be protected from retaliation or intimidation for participating in this investigation.

Employees should be able to provide truthful information concerning Chief Traylor's statements, the actual reason for my release, budget discussions, Chris Day, and the Manvel Police Association without concern that their employment will be adversely affected.

Because Chief Traylor remains in direct authority over all potential witnesses, I request that the City consider **appropriate temporary administrative measures, including paid administrative leave if deemed necessary**, to preserve the independence of the investigation and prevent actual or perceived retaliation or interference.

VIII. REQUESTED CORRECTIVE ACTION

If the investigation determines that my release was legitimately and consistently based upon documented budgetary necessity, the evidence should establish that.

However, if the investigation determines that the budget explanation was pretextual and that I was released because of my association with Chris Day, I request appropriate corrective action.

That should include consideration of:

reinstatement to my Reserve Police Officer position; restoration of my department status and records as appropriate; correction of the stated reason for my separation; and any other relief available under City policy or applicable law.

If the investigation establishes that Chief Traylor knowingly retaliated against me, abused his authority, provided a false or pretextual justification for my release, or committed other serious policy violations, I request that the City impose discipline **commensurate with the findings, up to and including termination if warranted.**

CONCLUSION

Mr. Johnson, this complaint is not based merely upon my disagreement with a personnel decision.

The central issue is straightforward:

Was I released because of legitimate budgetary necessity, or was “budget” used as a justification to remove me because of my association with Chris Day?

That question can be answered through objective evidence.

The city can review its budget, reserve staffing before and after my release, treatment of other reserve officers, communications concerning the decision, the chronology of when the decision was made, and statements made by the individuals involved.

I respectfully request that the city conduct that investigation rather than simply accept the stated reason for my release.

If the evidence establishes retaliation or an improper exercise of authority, I ask that the City take appropriate corrective action, including **reinstating me as a Reserve Police Officer and imposing appropriate discipline upon any employee responsible for the misconduct.**

I also respectfully request an **in-person meeting with you** to provide additional information, identify witnesses, and answer questions concerning this complaint.

Please provide written confirmation that this complaint has been accepted, the assigned control number, and the process that will be used to independently investigate these allegations.

Thank you for your consideration.

Respectfully,

David J. Guerrero

David Guerrero

Former Reserve Police Officer
Manvel Police Department