

To: Dan Johnson, City Manager

From: Chris Day

Subject: Formal Complaint – Chief Keith Traylor / Request for Independent Investigation

Date: September 3rd 2026

Dear Mr. Johnson:

I respectfully submit this formal personnel complaint against Chief of Police Keith Traylor concerning his conduct during and surrounding Internal Affairs Investigation MPD Control #26070002 and the disciplinary process that resulted in my termination.

My termination appeal has been finalized and my termination was upheld. This complaint is therefore separate from my appeal. I am requesting an independent investigation into whether Chief Traylor violated Texas law, Manvel Police Department policy, City policy, or standards governing retaliation, abuse of authority, procedural fairness, and supervisory conduct.

I further request that Chief Traylor be placed on paid administrative leave during the investigation to protect witnesses, preserve evidence, and prevent actual or perceived retaliation or interference.

If the investigation sustains serious violations, I request discipline up to and including termination. If the investigation establishes that Chief Traylor's misconduct materially affected, predetermined, or improperly influenced the process resulting in my termination, I request that the City rescind my termination and reinstate me with appropriate restoration of employment status, seniority, wages, and benefits.

I. TEXAS GOVERNMENT CODE CHAPTER 614 / POLICY 1010

I request an investigation into whether Chief Traylor complied with the complaint requirements of Texas Government Code Chapter 614 and MPD Policy 1010.

Policy 1010.5.1 provides for a copy of the signed complaint form to be given to an accused officer within a reasonable time.

I was never provided a complaint signed by Officer Nancy Morfin. The allegations originated with Morfin, were communicated to Lieutenant McClain, and were subsequently incorporated into a Chief's Administrative Complaint.

I also was not provided Lieutenant McClain's underlying memorandum before discipline was imposed.

I request that the investigator determine what document the City contends satisfied Chapter 614 and Policy 1010, who signed it, when it was provided to me, and whether all statutory and policy requirements were satisfied before disciplinary action was taken.

II. FAILURE TO PROVIDE EVIDENCE BEFORE TERMINATION

Policy 1010.10.2 requires the Chief to provide an employee access to:

“all of the materials considered by the Chief of Police in recommending the proposed discipline.”

I was not provided all of those materials before my termination.

The complete IA materials were provided to my attorney only after I appealed.

I request a finding as to whether Chief Traylor violated Policy 1010 by terminating me without first providing access to the materials he considered in making that decision.

III. RESPONSE PERIOD AND RIGHT TO REPRESENTATION

Policy 1010 provides an opportunity to respond to proposed discipline within five days of receiving notice.

I received the findings on August 10 and was required to submit my written response by August 12, with my meeting scheduled for August 13.

I therefore request a determination of whether the shortened response period violated Policy 1010.

I also received only approximately 45 minutes' notice before my administrative interview.

Policy 1010 expressly provides that employees subjected to interviews that could result in discipline have the right to an uninvolved representative.

The extremely short notice did not provide me adequate time to consult with my attorney or arrange for representation. I request that the investigator determine whether this effectively denied me a meaningful opportunity to exercise the representation right provided by policy.

IV. EVIDENCE THAT MY TERMINATION MAY HAVE BEEN PREDETERMINED

During my August 13 disciplinary meeting, Chief Traylor told me that he had spent the day reviewing the evidence before making his decision to terminate me.

However, my termination letter is dated August 12 — the day before the meeting.

That discrepancy requires investigation.

Policy 1010 contemplates consideration of the employee's response before the Chief renders the written disciplinary decision.

A termination letter is an extremely important personnel document. A document of that significance should accurately reflect when the decision was made.

I request review of the original electronic letter, metadata, drafts, creation and modification dates, emails, Human Resources communications, and other records to determine:

- when the termination letter was actually prepared;
- when Chief Traylor decided to terminate me;
- whether the decision was made before the August 13 meeting; and
- whether my response was genuinely considered before termination was finalized.

If the letter was substantially complete before my August 13 meeting, I believe that would support my allegation that termination was a predetermined outcome.

V. POSSIBLE RETALIATION – MANVEL POLICE ASSOCIATION

I also request investigation into whether my termination was influenced by my position as President of the Manvel Police Association.

At the time of my IA investigation, the Association was discussing a possible vote of no confidence in Chief Traylor.

I believe Chief Traylor became aware of those discussions.

While I was in Florida, Chief Traylor reportedly apologized to command staff during a Monday supervisors' meeting for being verbally abusive toward them and stated words to the effect:

“The Association is trying to stab me in the back.”

Because I was President of the Association, this statement raises a legitimate concern regarding possible retaliatory motive.

MPD Policy 320 prohibits retaliation against employees making good-faith complaints or disclosures and recognizes retaliation as potentially serious misconduct.

Policy 1003 similarly provides for a grievance process without “discrimination, coercion, restraint or retaliation.”

I request that the investigator determine whether Chief Traylor's knowledge of Association activities or my position as President influenced the investigation, treatment of evidence, procedural decisions, or severity of discipline imposed against me.

VI. POSSIBLE ABUSE OF AUTHORITY

Policies 320.7(d) and 320.9.2(b) were among the standards considered during my investigation. Those provisions address improper or wrongful exercises of authority.

I respectfully request that the same standards be applied to Chief Traylor.

If he used his authority to retaliate against me, predetermine my termination, deny procedural protections, or otherwise manipulate the disciplinary process for an improper purpose, his actions should be evaluated under the same standards applied to subordinate employees.

VII. TOXIC, INTIMIDATING, AND RETALIATORY WORK ENVIRONMENT

I further request that the investigation determine whether Chief Traylor created or contributed to a toxic, intimidating, coercive, and retaliatory work environment within the Manvel Police Department.

His reported statement that the Association was trying to "stab me in the back," his reportedly verbally abusive conduct toward command staff, and his reaction to the possible vote of no confidence should be independently examined.

Potential witnesses should be asked whether they experienced or witnessed similar conduct and whether employees believed that criticizing the Chief, participating in Association activities, reporting concerns, or providing information adverse to him could negatively affect their employment.

The purpose of this allegation is to determine whether there was a broader pattern of retaliation, intimidation, coercion, or misuse of supervisory authority, rather than limiting the investigation solely to what happened to me.

VIII. REQUEST FOR INDEPENDENT INVESTIGATION AND ADMINISTRATIVE LEAVE

Because Chief Traylor is the subject of this complaint, I respectfully request that the City:

1. Open a new and separate formal investigation and assign it a control number.
2. Appoint an independent outside investigator who had no involvement in IA #26070002 or my termination appeal.

3. Immediately preserve relevant emails, texts, Teams communications, IA records, HR communications, termination-letter drafts and metadata, and communications concerning me, the Manvel Police Association, or the possible vote of no confidence.
4. Interview witnesses who heard Chief Traylor's statements concerning the Association and his reported treatment of command staff.
5. Determine whether Chapter 614, Policy 1010, Policies 320 and 1003, and other applicable policies or laws were violated.
6. Determine whether retaliation, abuse of authority, predetermination, intimidation, or other misconduct occurred.
7. Provide me written notice of the findings and disposition of each allegation.

I also request that Chief Traylor be placed on paid administrative leave pending completion of the investigation.

This is not requested as punishment or as a presumption of guilt. It is necessary to protect the integrity of the investigation and allow subordinate employees to provide information without actual or perceived fear of retaliation.

Significantly, the Chief's Administrative Complaint in my own IA recommended consideration of temporary administrative measures to:

“preserve the integrity of the investigation and prevent any actual or perceived retaliation.”

I respectfully request that the same standard be applied to the Chief of Police.

While the investigation is pending, Chief Traylor should not contact potential witnesses regarding this complaint, participate in the investigation, receive confidential investigative updates, or make employment decisions affecting witnesses involved in the investigation.

IX. REQUESTED DISCIPLINE AND REINSTATEMENT

I am not asking that Chief Traylor be terminated merely because I filed this complaint. I am asking that he receive the same fair and impartial investigative process that should apply to every employee.

However, if the independent investigation sustains serious violations involving retaliation, abuse of authority, predetermination, intentional procedural violations, or other significant misconduct, I respectfully request that the City impose discipline up to and including termination of Chief Traylor's employment.

Likewise, my termination appeal has concluded and was upheld. However, if this independent investigation establishes that Chief Traylor's misconduct materially affected, tainted, predetermined, or improperly influenced the investigation or disciplinary process that resulted in my termination, I request that the City take corrective action.

Specifically, I request that the City rescind my termination, reinstate me to my former position or an equivalent position, restore my seniority and employment status, restore lost wages and benefits to the extent authorized, and correct my personnel record as appropriate.

X. REQUEST FOR IN-PERSON MEETING

I also respectfully request an in-person meeting with you regarding this complaint.

I would like the opportunity to identify witnesses, provide supporting evidence, explain the August 12/13 termination-letter discrepancy, identify individuals with knowledge of Chief Traylor's statements regarding the Association, and answer any questions you may have.

CONCLUSION

Mr. Johnson, my termination appeal has concluded and my termination was upheld. This complaint presents a different question:

Did Chief Traylor violate Texas law, Department policy, City policy, or standards governing retaliation and the proper exercise of supervisory authority while conducting the process that resulted in my termination?

The allegations are serious enough to warrant an independent investigation.

I respectfully request that the City open a separate investigation, appoint an independent outside investigator, preserve all relevant evidence, place Chief Traylor on paid administrative leave to protect witnesses and the integrity of the investigation, and provide me written findings when the investigation is complete.

If the allegations are sustained, I ask that Chief Traylor be held to the same standards applied to other Department employees, including termination if warranted by the seriousness of the sustained violations.

If his misconduct is found to have materially affected or predetermined my termination, I further request that the City rescind that termination and reinstate me with appropriate restoration of wages, benefits, seniority, and employment status.

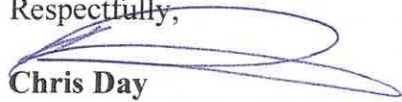
I am requesting consistent accountability and an independent review of the evidence.

Please provide written confirmation that this complaint has been accepted, the assigned control number, the process for selecting the independent investigator, whether administrative leave will be imposed, and the procedures that will govern the investigation.

I also respectfully request that we schedule an in-person meeting at your earliest reasonable availability.

Thank you for your attention to this matter.

Respectfully,



Chris Day

Former Patrol Captain

Former President, Manvel Police Association