

Exhibit 32



U.S. Department of Justice

Civil Rights Division

Coordination and Review Section - NWB
950 Pennsylvania Avenue, NW
Washington, DC 20530

MAR 25 2009

VIA ELECTRONIC AND U.S. MAIL

Clarice McCormick, Esq.
Maricopa County Attorney's Office
222 North Central Avenue
Suite 1100
Phoenix, AZ 85004

Re: Complaint No. 171-08-21
Maricopa County (AZ) Sheriff's Office

Dear Ms. McCormick:

As we notified you by letter addressed to Sheriff Joseph Arpaio, dated March 10, 2009, from Acting Assistant Attorney General Loretta King, the Coordination and Review Section (COR), Civil Rights Division, U.S. Department of Justice (DOJ), is initiating an investigation of a complaint alleging discrimination on the basis of national origin (Hispanic) by the Maricopa County Sheriff's Office (MCSO) in the operation of its jail facilities. This investigation is being conducted in cooperation with the Special Litigation Section of the Civil Rights Division. Please note that our decision to initiate an investigation does not reflect any determination as to the merits of the complaint. Our goal is to investigate this matter in a fair and impartial manner, and to work with you to reach a productive and amicable resolution.

The complaint alleges that the MCSO lacks a language assistance policy for limited English proficient (LEP) inmates as set forth in DOJ's LEP Recipient Guidance Document (enclosed) and also has an English-only policy in its jails that discriminates against LEP inmates. The complaint alleges that detention officers, even those who are bilingual in Spanish, are required to speak to inmates in English at all times, except in case of an emergency, thereby impeding language access for inmates. Further, the complaint alleges that because of the English-only policy in the jails, LEP inmates are at risk for inadequate medical care due to the language barrier (e.g., potential misdiagnosis, incorrect administration of medications). The complaint also states that mandatory classes on government, criminal justice, and other topics discriminate against LEP inmates because they are conducted in English. The complaint notes that the MCSO provides an English language class, but asserts that the two-week course is not sufficient to remedy the problems posed by the English-only policy. Furthermore, the complaint

alleges that the MCSO schedules LEP inmates to meet with their attorneys and court-appointed interpreters at times when interpreters are often unavailable due to their regular courtroom duties, thereby impeding LEP inmates from meeting with their attorneys. In addition, the complaint asserts that the MCSO website, which contains descriptions of inmate programs, FAQs, and visitation information geared to the public, is in English only, thereby impeding LEP inmate and visitor access to important information.

The complaint further alleges that the MCSO jail visitation policy discriminates on the basis of national origin and limited English proficiency. The complaint asserts that the policy requires visitors to present identification and fill out a visitation request form with detailed questions about citizenship status and that a citizenship check is required of every visitor. The complaint alleges that this policy is implemented in a manner that is discriminatory toward Hispanic and limited English proficient visitors. In particular, the complaint claims that, in practice, Hispanic visitors are required to submit the forms, whereas others are not, and the forms are not available in languages other than English.

COR is responsible for investigating complaints against recipients of federal financial assistance from DOJ under Title VI of the Civil Rights Act of 1964 ("Title VI"), as amended, 42 U.S.C. § 2000d *et seq.*, and the nondiscrimination provisions of the Omnibus Crime Control and Safe Streets Act of 1968 ("Safe Streets Act"), as amended, 42 U.S.C. § 3789d(c). Together, these statutes prohibit discrimination on the basis of race, color, national origin, sex, or religion by recipients of DOJ assistance, including grants provided through DOJ's Office of Justice Programs and the Office of Community Oriented Policing Services. Shared assets from the Criminal Division's Asset Forfeiture and Money Laundering Section also constitute federal financial assistance from DOJ. The Department's recipients include police and sheriffs' departments, state departments of corrections, and other entities. The MCSO is a recipient of federal financial assistance from DOJ and, therefore, we have jurisdiction to conduct an investigation of the issues raised in this complaint.

In the course of investigating administrative complaints against recipients of DOJ's assistance, COR seeks to determine whether alternative dispute resolution (ADR) is appropriate. The goal of ADR is to enter into a voluntary compliance agreement that resolves the concerns raised without making a formal determination concerning the merits of the complaint. If the recipient does not wish to engage in ADR or if it is not possible to achieve a voluntary resolution in this matter early in the investigation, COR may conduct a full investigation of the issues raised. (At any time during this investigation, however, ADR remains a possibility if the recipient should decide it is interested in pursuing a voluntary resolution of the matter.)

Generally, when an administrative investigation is completed, the formal results of the investigation are conveyed to the recipient and the complainant in a findings letter. If COR believes that its investigation demonstrates unlawful discrimination, however, attempts are made to resolve the matter before issuing such a letter. If an agreement cannot be reached on a remedy, an enforcement action may be initiated. This may take the form of an administrative hearing to terminate DOJ's financial assistance to the programs and activities of the recipient agency, or

may involve other means of enforcement authorized by law, including referral to a DOJ litigating section for court enforcement.

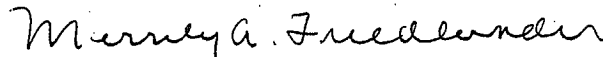
As an initial step in our investigation of this complaint, we request that the MCSO provide us with a position statement responding to the allegations of discrimination, as summarized above. In addition, please provide the information requested in ¶¶ 43-51 of the enclosed "First Request for Documents and Information." Please also feel free to send any additional information that the MCSO would like the DOJ to consider in making a determination in this case.

We are obligated to inform you that no one may intimidate, threaten, coerce, or engage in other discriminatory or retaliatory conduct against anyone because he or she has either taken action or participated in an action to secure rights protected by the civil rights laws we enforce. Any individual alleging such harassment or intimidation may file a complaint with the Department of Justice. We would investigate such a complaint if the situation warrants.

Under the Freedom of Information Act, it may be necessary to release this document and related correspondence and records upon request. In the event that we receive such a request, we will seek to protect, to the extent provided by law, personal information which, if released, could constitute an unwarranted invasion of privacy.

If you have any questions regarding this letter, please contact Ms. Luz Lopez-Ortiz, the COR attorney assigned to this case, at (202) 616-5571. Questions about other allegations and submissions in response to the "First Request for Documents and Information" should be directed to the Special Litigation Section, as described in the attached cover letter. We very much appreciate your cooperation in this investigation.

Sincerely,



Merrily A. Friedlander
Chief

Coordination and Review Section
Civil Rights Division

Enclosure