

Exhibit 33

INVESTIGATION OF THE
MARICOPA COUNTY SHERIFF'S OFFICE

FIRST REQUEST FOR DOCUMENTS AND INFORMATION

Please provide copies of all of the documents and materials listed below, from January 1, 2008, to the date of production, unless otherwise stated. For information maintained in electronic format, we request that you provide the information in the same format and identify the software program and version required to read the file, and also provide any explanatory information necessary to understand the structure of the file (in the case of databases, for example). For materials not maintained electronically, please provide hard copies. If you believe that any documents or information that are not identified below would assist our review of relevant issues, as set forth below, please do not hesitate to provide such documents and information.

Please feel free to contact us to discuss any questions or concerns regarding this request. If responsive documents or information do not exist, we ask that you affirmatively inform us of the same or provide us with documents that contain substantially similar information.

ORGANIZATIONAL STRUCTURE AND GENERAL INFORMATION

1. A current organizational chart, delineating all components within the Maricopa County Sheriff's Office ("MCSO"), including operational sub-divisions, such as regions, areas, districts, or precincts (or comparable sectors). Please indicate MCSO's reporting relationship to the rest of the Maricopa County ("County") governmental structure.
2. For each unit or component within the MCSO organizational structure, including but not limited to specialized units that are not assigned to a specific station or precinct (e.g., SWAT, vice units, and rapid response teams), include a description of:
 - a. The function of each unit;
 - b. The location of each unit;
 - c. The area where each unit is deployed;
 - d. The protocol for activating each unit;
 - e. The number of officers, by rank, in each unit; and
 - f. The written criteria used to select personnel for assignment to these duties.

3. Identify and describe the function and reporting authority \ of all MCSO components or government entities (internal or external) that investigate or review allegations of misconduct, including unconstitutional searches and seizures and discriminatory policing.
4. The current number of sworn and unsworn MCSO personnel, broken down by precincts, districts (or comparable sectors), delineating title, including recruits, patrol officers, agents, investigators, sergeants, lieutenants, captains, inspectors, commanders, colonels, auxiliary superintendents, and any other "command staff."
5. The current number of all members of the voluntary group(s) known as the MCSO "posse," or other similar groups, broken down by precincts, districts (or comparable sectors), as well as by specialized assignment groupings and authorization to carry firearms. Please provide the policies and procedures, or otherwise identify, the selection criteria and training for members of such voluntary groups.
6. The current number and names of all MCSO personnel certified under the Memorandum of Agreement ("MOA") between the County and United States Immigration and Customs Enforcement ("ICE"), including a listing of personnel assigned to:
 - a. ~~Violent Fugitive Apprehension Squad~~
 - b. Criminal Investigation Section
 - c. Anti-Gang Unit
 - d. Drug Enforcement Unit
 - e. Community Action Teams
7. The number and names of all MCSO personnel that have had their certification under the MOA revoked pursuant to Section IX, whether by MCSO or by ICE. Include any documentation related to such revocation.
8. All minutes of meetings of the Steering Committee convened under Section XVI of the MOA.
9. All collective bargaining agreements currently covering MCSO police personnel, including command staff.
10. Any reports or summaries related to MCSO's accreditation by the Commission on Accreditation for Law Enforcement Agencies

("CALEA"), and any other accreditation sought by the MCSO in the last five years, whether or not MCSO ultimately received such accreditation.

11. All reports, plans, and other documents proposing reforms, organizational restructuring, operational enhancements, or other performance improvement initiatives that are currently under consideration, including their expected date of implementation, relating to: searches and seizures; equal protection; citizen and internal complaints; officer recruitment and selection; internal investigations; administrative action or disciplinary systems for officers or other MCSO employees; supervision; training; and accountability.
12. All studies, analyses, audits, inspections, memoranda, minutes of meetings, reports, or other documents from all review or investigative components or entities, internal and/or external to the MCSO, relating to searches and seizures and equal protection, including those relating to the MCSO 287(g) program and accompanying MOA. Include any County and/or MCSO response to such documents.
13. If applicable, all Inter-Governmental Services Agreements with ICE.
14. If applicable, a description of all technological purchases made by ICE pursuant to Section X of the MOA, including the rationale given for the purchased technology, the current location of the purchased technology, and all uses of the purchased technology.

POLICIES, PROCEDURES, AND RELATED MATERIALS

15. A description of MCSO's document retention policies and, where different and applicable, the document retention policies of the County.
16. All policies, procedures and manuals, including but not limited to general orders, standard operating procedures, orders, teletypes, bulletins, legal updates, and internal correspondence, including, but not limited to: searches and seizures; stops; frisks; arrests (including those for disorderly conduct, public intoxication, obstruction of justice, assault on a police officer, resisting arrest, and summary offenses); detention; transport of prisoners; physical restraints; brandishing of firearms; seizure and

handling of evidence; handling of informal and formal complaints against police officers, whether filed by civilians or MCSO personnel; investigations misconduct complaints; administrative discipline and/or corrective action; community relations; and equal protection.

17. Sample copies of all forms used by the MCSO to document its law enforcement activities, including but not limited to control of persons reports, force reporting forms, incident reports, arrest reports, field incident reports, patrol logs, radio logs, call logs, arrest logs, seizure reports and logs, jail logs, desk sergeant logs and reports, and evidence logs. If any of the foregoing forms do not exist, please so state.
18. All policies and procedures regarding the selection/nomination of MCSO personnel for training by ICE pursuant to the MOA.
19. All policies and procedures related to the enforcement, prioritization, or execution of the authorized functions designated in Section V of the MOA.
20. All policies or procedures related to notifying ICE of immigration enforcement activity authorized under the MOA, as described in Section XI.
21. All policies and procedures related to MCSO's transportation of individuals detained for any reason at MCSO facilities to ICE detention facilities.
22. All policies, procedures and manuals governing intake, investigation, classification, and disposition of citizen complaints (informal or formal). Provide a copy or other exemplar of forms, reports, and other documentation designed for use in the intake, investigation, disposition, and review of citizen complaints, including by not limited to the MCSO's citizen complaint form. Include all policies and procedures related to the complaint process outlined in Appendix B of the MOA, including the coordination of complaint handling between ICE and the MCSO.
23. All policies and procedures related to the MCSO's provision of interpreters, telephonic or otherwise, to persons that it has detained, seized, arrested, or otherwise restrained in movement.

24. All written materials or resources available or given to members of the public that explain the MCSO's citizen complaint process.
25. Provide all documents or other information relating to management of the risk of police misconduct, including all written guidance provided to all MCSO supervisors, managers, or executives. Explain how MCSO supervisors monitor the risk of on- or off-duty misconduct or policy violation, including tortious or unconstitutional behavior, excessive force, discriminatory law enforcement, corruption, dishonesty, moral turpitude, or conduct unbecoming an officer by MCSO officers, including managers and supervisors.

TRAINING

26. A current schedule of training for new recruits or in-service training for existing MCSO personnel, from July 1, 2008 through June 30, 2009, including the training topics to be covered, and the date, time, and location of the training.
27. A current schedule of training for volunteer members of "posses" or similar volunteer groups.
28. All current training curricula for new recruits and current officers (i.e., in-service training), including roll-call training.
29. All training materials, including initial and updated training materials, relating to the MOA with ICE. In addition, include materials related to local training, as described in Section VII of the MOA.
30. Information indicating MCSO's officer annual compliance rate for required in-service training from January 1, 2008 until the present.
31. The Field Training Officer ("FTO") manual and all other documents pertaining to the criteria for the FTO program, including but not limited to: the selection of FTOs, the training of FTOs, and sample documents relating to the reporting, recording, management and accountability for the FTO program.
32. The current number of FTOs, broken down by precinct (or

comparable sector).

33. A copy of evaluation forms used to evaluate MCSO personnel, from probationary officers through supervisory staff. Production of forms should be accompanied by clear explanation of frequency of evaluation (annual, semi-annual) as well as how, and by whom, form is reviewed and endorsed by command personnel other than the direct supervisor (evaluator).

INCIDENT REPORTS, COMPLAINTS, AND INVESTIGATIONS

34. Provide all documents relating to MCSO officer arrests, including, but not limited to, arrest reports, blotter entries, incident reports, arrest warrants and supporting materials, booking logs, patrol logs, radio logs, videotapes, and any other documents related to arrests by MCSO officer from January 1, 2008 to the present.
35. All complaints and accompanying documentation, including resolution, if any, related to unlawful search and seizure or discriminatory policing, including any complaints or accompanying documentation submitted or generated pursuant to Appendix B of the MOA.

ACCOUNTABILITY

36. Describe disciplinary and appeal processes for MCSO officers.
37. Identify those personnel or entities authorized to review recommend and/or impose disciplinary or corrective action related to searches and seizures and equal protection practices by MCSO personnel.
38. A list of all incidents in which conflicts have arisen between MCSO rules, standards, and policies and the order or direction of a supervisory ICE officer, as described in Section XI of the MOA. Include a description of the nature of the conflict, the specific parties and directives involved, and the resolution of the conflict, if any.
39. A list of all filed (whether dismissed, pending, or resolved) civil and criminal cases, indictments or arrests, of or against the County and/or the MCSO and/or any sworn officers related to searches and seizures or equal protection from January 1, 2008 until the present. Include

the case number of the alleged incident and complaint, indictment, or arrest, the names of the officers specified in the complaint, indictment, or arrest, and the outcome. Also include any data in the possession of the MCSO that captures the number of prosecutions dismissed as a result of a judicial or prosecutorial finding of officer misconduct related to effectuating searches or seizures and equal protection practices.

40. Description of MCSO's system for monitoring or auditing the practices of individual MCSO officers, groups of officers and volunteer members of "posses" or similar groups, with respect to searches and seizures or equal protection practices (e.g., an "early warning," "early identification," or "red-flagging" system) and the protocols, if any, established for dealing with "at-risk" officers. Identify the personnel and/or unit responsible for inputting data into the system; for preparing any reports identifying "at-risk" officers; and for reviewing information, management and discipline/corrective action related to these reports.
41. A list of all current or former MCSO personnel recommended for termination/discipline or corrective action, the reason for the recommended discipline or corrective action, whether discipline or corrective action was imposed, and the nature and duration of any discipline or corrective action imposed from January 1, 2008 to the present.
42. All data and statistical information gathered and/or maintained by the MCSO pursuant to maintaining compliance with the MOA. Include any requests made by ICE for specific tracking data.

LIMITED ENGLISH PROFICIENCY

Please provide the following information and, with respect to any policy, plan, procedure or data requested, provide copies of any versions in effect for the time period January 1, 2007 to the present, unless otherwise stated:

43. The breakdown of the number of inmates/detainees held in each of the MCSO jails, including the tent city, by race and national origin. Indicate how many, within each race and national origin, are LEP. Identify the primary languages spoken by the LEP persons and the total number within each

language group. Please provide this information for January 1 and March 15, 2009, and January 1, April 1, July 1, and October 1, 2008.

44. Copies of all MCSO jail policies and procedures regarding LEP inmates and visitors, including any English-only rules. Include any policies and procedures related to the allegations described in the third paragraph of the letter from Merrily Friedlander (attached) and those related to interacting with LEP persons over the phone, in person, through the MCSO web site, the translation of vital documents, and any other relevant media. Include a copy of MCSO's Language Access Plan, if one exists, and the date it went into effect. Please also explain how MCSO staff are made aware of the provisions of the plan. If the policies or procedures differ between any of the MCSO jails, please provide a copy of this information for each jail.
45. Copies of all MCSO policies and procedures regarding the visitation forms mentioned in the description of allegations in the third paragraph of the letter from Merrily Friedlander (attached). In addition, state the purpose for the forms, when the MCSO began using the forms, and whether the forms are given to all visitors. Also, please provide copies of all forms that visitors submitted at each of MCSO jails, including the tent city, for the year prior to the date of this request.
- ~~46. An explanation of how and when attorney visits with LEP inmates/detainees are scheduled to allow for the presence of an interpreter.~~
47. Copies of all complaints against MCSO received during the two years prior to the date of this request, relating in any way to any of the allegations described in the letter from Merrily Friedlander (attached). Please include the steps taken to address each complaint, a copy of the findings of any investigations, the current status of each complaint, and copies of any information gathered in connection with the complaint.
48. A copy of MCSO's policies and procedures for handling complaints, including those alleging discrimination or failure to provide services to persons who are LEP. If the procedures and/or complaint forms have been translated into any language other than English, please provide a copy of those translations.

49. A copy, if applicable, of MCSO's service agreement with a telephonic interpreter service, as well as data showing number of calls conducted through the telephonic service and the languages utilized.
50. Copies of training materials and records of training sessions provided to MCSO staff on the use of the telephonic interpretation service, and on handling encounters with LEP persons, as well as attendee lists and encounter statistics, if available.
51. Data on language capabilities of all MCSO jail staff listed by facility, hiring plans and practices, including incentives given for bilingual skills used on the job, and any procedures relating to assignment of bilingual staff.