

EXHIBIT 19

1 William R. Jones, Jr., Bar #001481
John T. Masterson, Bar #007447
2 Joseph J. Popolizio, Bar #017434
JONES, SKELTON & HOCHULI, P.L.C.
3 2901 North Central Avenue, Suite 800
Phoenix, Arizona 85012
4 Telephone: (602) 263-1700
Fax: (602) 200-7801
5 wjones@jshfirm.com
jmasterson@jshfirm.com
6 jpopolizio@jshfirm.com

7 Attorneys for Defendants Maricopa County
Sheriff's Office and Joseph M. Arpaio

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF ARIZONA**

11 United States of America,
12
13 v.
14 Maricopa County, Arizona; Maricopa County
15 Sheriff's Office; and Joseph M. Arpaio, in his
16 official capacity as Sheriff of Maricopa
17 County, Arizona,
Defendants.

NO. CV10-01878-PHX-GMS
**AFFIDAVIT OF ROBERT N.
DRISCOLL, ESQ.**

18 Washington, D.C.)
19 District of _____) ss.

20 Robert N. Driscoll, Esq., being first duly sworn, deposes and states as
21 follows:

22 1. I am a licensed attorney with the law firm of Alston & Bird, LLP in
23 Washington, D.C. I am a former Deputy Assistant Attorney General for the Civil Rights
24 Division of the U.S. Department of Justice ('DOJ') and former counsel for the Maricopa
25 County Sheriff's Office and Sheriff Joseph M. Arpaio ('Maricopa County') with regard to
26 the investigations giving rise to this action.
27

1 2. As a result of my representation of MCSO and Sheriff Arpaio in this
2 matter, I am familiar with the subject of the DOJ investigations relevant to this matter, and
3 participated in and conducted negotiations and communicated with the DOJ relative to
4 these investigations, including those referenced in this Affidavit and attached exhibits. In
5 addition, I am the author of the letters attached to the Statement of Facts in Support of the
6 Response to the United States' Motion for Summary Judgment as Exhibits 6-10 and 16.
7 Accordingly, I am competent and authorized to make this affidavit.

8 3. Before the MCSO submitted its Limited English Proficiency ('LEP')
9 position paper pursuant to the First Request for Documents and Information, DOJ's
10 Special Litigation Section ('SPL'), DOJ's Office of Coordination and Review ('COR'),
11 and counsel for Defendant Arpaio and MCSO, had numerous conversations pertaining to
12 deadlines for Title VI investigation related responses.

13 4. Every communication I had with DOJ until August 3, 2010 regarding
14 its Title VI investigation addressed only the LEP investigation; at no point during any
15 conversation did COR suggest that they sought information outside of the LEP
16 investigation.

17 5. Not until August 3, 2010, when Assistant Attorney General Thomas
18 E. Perez sent a letter to me regarding the Title VI portion of the investigation, did DOJ
19 first suggest to me that police practices were a component of the Title VI investigation.

20 6. Sheriff Arpaio and the MCSO have provided, and DOJ has otherwise
21 received, information and access relevant to its Title VI investigation.

22 7. Sheriff Arpaio and MCSO have also provided voluminous
23 documentation responsive to DOJ's First Request, despite a disagreement regarding the
24 proper scope of the DOJ's investigation and the tactics that DOJ employed to obtain
25 information and documents with the use of another federal agency, the Department of
26 Homeland Security ('DHS').

1 8. The March 25, 2009 letter that I received from Merrily Friedlander is
2 attached as Ex. 2 to the Statement of Facts in Support of the Response to the United
3 States' Motion for Summary Judgment.

4 9. I, on behalf of MCSO, expressed concern to DOJ that the scope of its
5 Title VI investigation, as outlined in DOJ's August 3, 2010 letter, went well beyond the
6 LEP program within the Maricopa County Jail System and instead purported to
7 encompass law enforcement police functions having nothing to do with discrimination.

8 10. On behalf of MCSO, I objected to the scope of DOJ's request for
9 information as unreasonable and beyond the scope of information to which the
10 government was legally entitled under Title VI.

11 11. Title VI is a funding statute that prohibits intentional race, color, and
12 national origin discrimination. Until the summer of 2010, it was my understanding that
13 DOJ's Title VI investigation had focused solely on the alleged national original
14 discrimination in the Maricopa County Jails.

15 12. In August 2010, DOJ informed me that the matters that were the
16 subject of the Section 14141 investigation purportedly were subject to Title VI
17 jurisdiction.

18 13. On behalf of MCSO and Sheriff Arpaio, I disagreed with this
19 proposition and questioned DOJ's fusing of its Title VI national origin jail investigation
20 with its Section 14141 investigation into MCSO's police practices.

21 14. Prior to August 2010, my understanding was that DOJ's Title VI
22 investigation was directed only toward the alleged national origin discrimination in the
23 jails.

24 15. As reflected in correspondence between myself and DOJ, a genuine
25 disagreement existed and was identified before the filing of this action and the instant
26 Motion regarding the unreasonableness of the scope of police practices and national origin
27 investigations under Title VI.

1 16. On behalf of the Sheriff and MCSO, I attempted to resolve this
2 disagreement cooperatively through negotiations.

3 17. In an August 24, 2010 meeting between DOJ and MCSO counsel,
4 DOJ would not acknowledge that any issue was beyond the scope of the Title VI
5 investigation (including issues of use of force, discipline of deputies, uniform and dress
6 policies).

7 18. DOJ contended that every document typically requested in a police
8 practices investigation may also be relevant to a Title VI investigation. In particular, DOJ
9 claimed that documents related to issues having nothing to do with national origin
10 discrimination (e.g. use of force, search and seizure), were properly within Title VI
11 jurisdiction.

12 19. MCSO became the subject of three independent investigations in a
13 matter of weeks after the change in Administration in Washington, D.C.: 1) SPL's
14 investigation into alleged pattern and practices of Constitutional or legal violations; 2)
15 COR's investigation into allegations of discrimination against LEP individuals, and; 3)
16 DHS's investigation into MCSO's 287(g) program.

17 20. Sheriff Arpaio and I were both critical of the ethical questionability
18 of DOJ's investigation of MCSO, including what appeared to be the political nature of the
19 investigation, DOJ's inappropriate insistence on unfettered access to MCSO, and the
20 unreasonable scope of the investigation.

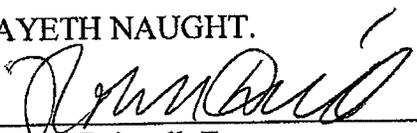
21 21. MCSO has provided DOJ with documentation that is responsive to
22 the DOJ's First Request before of the United States filed this action and Motion.

23 22. MCSO has designated documents disclosed in *Melendres v. Arpaio,*
24 *et al*, No. CV-07-2513-PHX-GMS, (approximately 12,850 pages) as responsive to DOJ's
25 First Request, as requested in the August 25, 2010 letter. It did so on August 27, 2010.

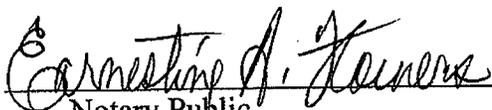
26 23. It is my belief that these designated documents go beyond DOJ's
27 requests associated with LEP and into the realm of police function, despite the dispute
28 between the parties regarding the proper scope of the Title VI investigation.

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FURTHER AFFIANT SAYETH NAUGHT.


Robert N. Driscoll, Esq.

SUBSCRIBED AND SWORN before me this 10th day of Dec, 2010 by Robert
N. Driscoll, Esq.


Notary Public

My Commission Expires:
Feb. 28, 2013

EXHIBIT 20

1 William R. Jones, Jr., Bar #001481
John T. Masterson, Bar #007447
2 Joseph J. Popolizio, Bar #017434
JONES, SKELTON & HOCHULI, P.L.C.
3 2901 North Central Avenue, Suite 800
Phoenix, Arizona 85012
4 Telephone: (602) 263-1700
Fax: (602) 200-7801
5 wjones@jshfirm.com
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6 jpopolizio@jshfirm.com

7 Attorneys for Defendants Maricopa County
Sheriff's Office and Joseph M. Arpaio

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF ARIZONA**

11 United States of America,

12 Plaintiff,

13 v.

14 Maricopa County, Arizona; Maricopa County
15 Sheriff's Office; and Joseph M. Arpaio, in his
official capacity as Sheriff of Maricopa
16 County, Arizona,

17 Defendants.

NO. CV10-01878-PHX-GMS

**AFFIDAVIT OF CHIEF GERARD
SHERIDAN**

18 STATE OF ARIZONA)
19 County of Maricopa) ss.

20 Gerard Sheridan, being first duly sworn, deposes and states as follows:

21 1. I am over the age of 18 years, am competent to testify to the matters
22 set forth in this Affidavit, and make this Affidavit from my own personal knowledge.

23 2. I am the Interim Chief Deputy for the Maricopa County Sheriff's
24 Office ("MCSO"). I have overseen the administration and operation of the Maricopa
25 County jails for more than 10 years.

26 3. I am familiar with the United States Department of Justice's (DOJ)
27 investigation of the Maricopa County Sheriff's Office, the cooperation and position of the
28

1 MCSO and Sheriff Arpaio with regard to these investigations, and am authorized and have
2 the personal knowledge necessary to make this affidavit.

3 4. Defendants have provided and the United States has otherwise
4 received information and access relevant to its investigation.

5 5. Defendants have allowed and/or offered access to MCSO staff, as
6 well as the MCSO jail facilities set out in the United States August 25, 2010 letter to
7 MCSO.

8 6. Defendants have also provided voluminous documentation in
9 response to the United States First Request for Documents and Information, despite a
10 disagreement regarding the proper scope of the United States' investigation and the
11 surreptitious tactics the United States employed to obtain information and documents with
12 the use of another federal agency, the Department of Homeland Security ("DHS").

13 7. Despite the unreasonableness and improprieties of the United States'
14 investigation, Sheriff Arpaio has granted the United States access to MCSO staff and
15 facilities as the United States requested in its August 25, 2010 letter, despite the United
16 States' contention.

17 8. Within twelve (12) days of their appearance (November 2, 2010),
18 attorneys from the law firm of Jones, Skelton & Hochuli met with five U.S. Attorneys in
19 Phoenix to discuss the United States' First Request and its investigation of MCSO,
20 generally.

21 9. On November 2, 2010, five U.S. Attorneys met with MCSO Chief
22 Jack MacIntyre and me, as well as defense counsel, William R. Jones, John T. Masterson
23 and Joseph J. Popolizio at the offices of Jones, Skelton & Hochuli, P.L.C.

24 10. As a result of that meeting, Chiefs MacIntyre and I pledged that the
25 United States would receive access to MCSO facilities, staff, and inmates as requested.

26 11. During the November 2, 2010 meeting, I offered to commence the
27 requested tours of the MCSO facilities that very afternoon.

1 12. The United States declined that offer and, instead, elected to return
2 the following week to tour the MCSO facilities.

3 13. One week later, on the morning of November 9, 2010, a team of DOJ
4 Attorneys from Washington, D.C. met with MCSO command staff and counsel at 4th
5 Avenue Jail.

6 14. During that meeting, MCSO command staff, including Chief
7 MacIntyre and I, once again pledged to cooperate with the DOJ's investigation.

8 15. At the conclusion of that meeting, a the DOJ attorney team began a
9 day-long tour of the Maricopa County Jails including 4th Avenue Jail, Central Intake,
10 Estrella Jail, Towers Jail, Durango Jail, In-Tents, and Lower Buckeye Jail.

11 16. As initially agreed, inmate and MCSO command staff interviews
12 were scheduled to commence on November 10, 2010. The United States, however,
13 postponed their commencement.

14 17. Instead, the U.S. Attorneys elected to commence inmate interviews
15 on November 16, 2010 and to postpone command staff interviews indefinitely.

16 18. As with the inmate interviews, MCSO has pledged cooperation
17 regarding the DOJ interviews of MCSO staff which will occur in the near future.

18 19. The MCSO is patiently awaiting word from the DOJ regarding when
19 it would like to commence MCSO staff interviews.

20 20. The MCSO/Sheriff Arpaio has accommodated every request by a
21 DOJ interview team to alter the inmate interview schedule, also.

22 21. In addition, MCSO staff accommodated the United States by
23 accepting the United States requested inmate interview schedule, by providing it with
24 legal rooms to conduct ex parte interviews at each facility and by accommodating several
25 teams consisting of Assistant United States Attorneys and interpreters to conduct
26 interviews simultaneously.

27 22. All of this occurred in addition to the previously scheduled tours and
28 visits of other organizations.

1 23. The United States' requested inmate interview schedule was as
2 follows: November 16, 2010 (two teams--one full day/one just in the afternoon);
3 November 17 and 18, 2010 (two teams all day); November 19, 2010 (one team all day);
4 November 22 and 23, 2010 (two teams all day); November 24, 2010 (one team all day);
5 November 30, December 2, and December 3, 2010 (two teams all day).

6 24. Through December 3, 2010, the DOJ teams, pursuant to their
7 requests, conducted approximately 54 hours of interviews of 86 inmates selected from
8 inmate rosters at Estrella, Durango, Tents, and Lower Buckeye jails. And more
9 interviews may occur in the future.

10 25. As the DOJ attorneys informed me, Chief MacIntyre and attorneys
11 Joseph J. Popolizio and John T. Masterson, the postponement of the command staff
12 interviews was, in part, due to the voluminous MCSO documentation that the United
13 States had received on November 5, 2010 via overnight delivery in response to the First
14 Request and pursuant to the pledge of MCSO Chiefs at the aforementioned November 2,
15 2010 meeting.

16 26. The documentation mentioned in paragraph 25 consisted of all of the
17 MCSO policies (1101 pages) that the United States requested within the First Request, but
18 is not even close to the total number of documents that the MCSO has provided to the
19 DOJ pursuant to its requests.

20 27. The documents that the MCSO produced go beyond DOJ's requests
21 associated with LEP and into the realm of police function, despite the dispute between the
22 parties regarding the proper scope of the Title VI investigation.

23 28. The MCSO has provided other documentation in response to the
24 DOJ's First Request and before the filing of this action and Motion.

25 29. In addition, the MCSO has designated documents disclosed in
26 *Melendres v. Arpaio, et al*, No. CV-07-2513-PHX-GMS, (approximately 12,850 pages) as
27 responsive to the DOJ's First Request, as requested in the August 25, 2010 letter. It did so
28 on August 27, 2010.

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30. Further, the MCSO has also provided 11 documents associated with grievance and visitation processes, as well as 808 pages of documents in support of its LEP position paper. But the production does not stop there.

31. On December 10, 2010, the MCSO and Sheriff Arpaio sent via Federal Express a hard drive containing 931 gigabytes of documentation responsive to the First Request, also.

32. As the DOJ is also aware, MCSO and Sheriff Arpaio have provided 116 boxes of documents consisting of hundreds of thousands of pages in response to the First Request, which must be either placed in electronic format or perhaps made available to DOJ counsel for review.

33. Moreover, the DOJ has presumably received documentation and interview information pursuant to its arrangement with the DHS.

34. The MCSO and Sheriff Arpaio have provided the access to facilities, staff, documentation, information and inmates that the DOJ has requested.

FURTHER AFFIANT SAYETH NAUGHT.


Chief Gerard Sheridan

SUBSCRIBED AND SWORN before me this 10th day of Dec., 2010 by Chief Gerard Sheridan.


Notary Public

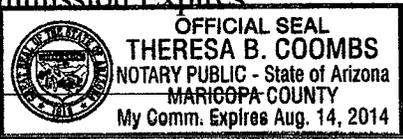
My Commission Expires:


EXHIBIT 21

1 William R. Jones, Jr., Bar #001481
John T. Masterson, Bar #007447
2 Joseph J. Papolizio, Bar #017434
JONES, SKELTON & HOCHULI, P.L.C.
3 2901 North Central Avenue, Suite 800
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7 Attorneys for Defendants Maricopa County
Sheriff's Office and Joseph M. Arpaio

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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF ARIZONA**

11 United States of America,

12 Plaintiff,

13 v.

14 Maricopa County, Arizona; Maricopa County
15 Sheriff's Office; and Joseph M. Arpaio, in his
16 official capacity as Sheriff of Maricopa
County, Arizona,

17 Defendants.

NO. CV10-01878-PHX-GMS

**AFFIDAVIT OF LT. ERNEST
ALCALA**

18 STATE OF ARIZONA)
19 County of Maricopa) ss.

20
21 Lieutenant Ernest Alcalá, being first duly sworn, deposes and states as
22 follows:

23 1. I am over the age of 18 years, am competent to testify to the matters
24 set forth in this Affidavit, and make this Affidavit from my own personal knowledge.

25 2. I am a Lieutenant with the Maricopa County Sheriff's Office
26 ("MCSO") and have been employed since April 1990. I am currently assigned as the
27 Special Response Team Commander at Lower Buckeye Jail.

1 3. Through my employment with MCSO, I am familiar with and have
2 personal knowledge of the United States Department of Justice's (DOJ) investigation, the
3 cooperation of the MCSO and Sheriff Arpaio regarding those investigations, and matters
4 related to this action.

5 4. MCSO has provided and the United States has otherwise received
6 information and access relevant to its investigation.

7 5. MCSO and Sheriff Arpaio have allowed and/or offered access to
8 MCSO staff, as well as the MCSO jail facilities set out in the United States August 25,
9 2010 letter to MCSO.

10 6. MCSO and Sheriff Arpaio have also provided voluminous
11 documentation in response to the United States First Request for Documents and
12 Information, despite a disagreement regarding the proper scope of the United States'
13 investigation and the surreptitious tactics the United States employed to obtain
14 information and documents with the use of another federal agency, the Department of
15 Homeland Security ("DHS").

16 7. Despite the unreasonableness and improprieties of the United States'
17 investigation, Sheriff Arpaio has granted the United States access to MCSO staff and
18 facilities as the United States requested in its August 25, 2010 letter, contrary to the
19 United States' contention.

20 8. On the morning of November 9, 2010, a team of DOJ Attorneys from
21 Washington, D.C. met with MCSO command staff and counsel at 4th Avenue Jail.

22 9. At the conclusion of that meeting, a DOJ attorney team began a day-
23 long tour of the Maricopa County Jails.

24 10. Accompanied by Sergeant James Seibert and myself, as well as
25 officers assigned to a given facility selected at random, the DOJ team toured Fourth
26 Avenue (including Central Intake), Durango, Estrella, Towers, Lower Buckeye, and In
27 Tents jail facilities—i.e. all of the Maricopa County jail facilities that the United States
28 requested to tour.

1 11. Defense attorneys Joseph J. Popolizio and John T. Masterson also
2 attended the tours.

3 12. MCSO personnel and counsel complied with the DOJ team's every
4 request.

5 13. During the jail tours, the DOJ team spoke directly to MCSO
6 detention officers, all of whom were allowed to speak freely with the U.S. Attorneys.

7 14. As the tours occurred, MCSO detention officers answered the U.S.
8 Attorney team's questions regarding the particular jails, including pods within the jails,
9 jail programs, the provision of medical care, as well as inmate (including LEP inmate)
10 access to programs and medical care.

11 15. Neither defense counsel nor present command staff curtailed the open
12 dialogue between the MCSO officers and the members of the DOJ team.

13 16. In addition, during the facility tours, U.S. Attorney team members
14 also spoke with Correctional Health Services (CHS) personnel, the medical professionals
15 who provide medical care to inmates in the Maricopa County Jail system.

16 17. During the tours, members of the U.S. Attorney team requested
17 medical and grievance forms available at each facility, also. Each request was granted
18 without hesitation.

19 18. Furthermore, MCSO Sergeant James Seibert provided the U.S.
20 Attorneys with MCSO duty rosters as requested and pledged to provide inmate rosters the
21 next morning when the U.S. Attorneys were scheduled to commence inmate and
22 command staff interviews.

23 19. Pursuant to the United States' request, inmate interviews were
24 scheduled to occur November 16, 17, 18, 19, 22, 23, 24, and 30, as well as December 2
25 and 3, 2010; these interviews have proceeded as requested, unless the teams of Assistant
26 United States Attorneys and their interpreters altered their requested schedule.

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1 20. Each morning, the teams of interviewers received inmate rosters as
2 they requested. The interviewing teams chose the inmates whom they wished to
3 interview.

4 21. The MCSO/Sheriff Arpaio has accommodated every request by a
5 DOJ interview team to alter the inmate interview schedule, also.

6 22. In addition, MCSO staff accommodated the United States by
7 accepting the United States requested inmate interview schedule, by providing it with
8 legal rooms to conduct ex parte interviews at each facility and by accommodating several
9 teams consisting of Assistant United States Attorneys and interpreters to conduct
10 interviews simultaneously.

11 23. All of this occurred in addition to the previously scheduled tours and
12 visits of other organizations.

13 24. The United States' requested inmate interview schedule was as
14 follows: November 16, 2010 (two teams--one full day/one just in the afternoon);
15 November 17 and 18, 2010 (two teams all day); November 19, 2010 (one team all day);
16 November 22 and 23, 2010 (two teams all day); November 24, 2010 (one team all day);
17 November 30, December 2, and December 3, 2010 (two teams all day).

18 25. Through December 3, 2010, the DOJ teams, pursuant to their
19 requests, conducted approximately 54 hours of interviews of 86 inmates selected from
20 inmate rosters at Estrella, Durango, Towers, Tents, and Lower Buckeye jails.

21 26. And more interviews may occur in the future.

22 27. The postponement of the command staff interviews was, in part, due
23 to the voluminous MCSO documentation that the United States had received on
24 November 5, 2010 via overnight delivery in response to the First Request and pursuant to
25 the pledge of MCSO Chiefs at the aforementioned November 2, 2010 meeting.

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28. The documentation consisted of all of the MCSO policies (1101 pages) that the United States requested within the First Request.

FURTHER AFFIANT SAYETH NAUGHT.

Lt. Ernest Alcala A3980
Lt. Ernest Alcala

SUBSCRIBED AND SWORN before me this 10 day of December 2010 by Lt. Ernest Alcala.

Stacy Stotts
Notary Public

My Commission Expires:
June 19, 2011



EXHIBIT 22

1 William R. Jones, Jr., Bar #001481
John T. Masterson, Bar #007447
2 Joseph J. Popolizio, Bar #017434
JONES, SKELTON & HOCHULI, P.L.C.
3 2901 North Central Avenue, Suite 800
Phoenix, Arizona 85012
4 Telephone: (602) 263-1700
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jmasterson@jshfirm.com
6 jpopolizio@jshfirm.com

7 Attorneys for Defendants Maricopa County
Sheriff's Office and Joseph M. Arpaio
8

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF ARIZONA**

11 United States of America,

12 Plaintiff,

13 v.

14 Maricopa County, Arizona; Maricopa County
15 Sheriff's Office; and Joseph M. Arpaio, in his
16 official capacity as Sheriff of Maricopa
County, Arizona,

17 Defendants.

NO. CV10-01878-PHX-GMS

**AFFIDAVIT OF SGT. JAMES
SEIBERT**

18 STATE OF ARIZONA)
19 County of Maricopa) ss.

20 Sgt. James Seibert, being first duly sworn, deposes and states as follows:

21 1. I am over the age of 18 years, am competent to testify to the matters
22 set forth in this Affidavit, and make this Affidavit from my own personal knowledge.

23 2. I am a Sergeant with the Maricopa County Sheriff's Office
24 ("MCSO") and have been employed for approximately 24 years.

25 3. Through my employment with MCSO, I am familiar with and have
26 personal knowledge of the United States Department of Justice's (DOJ) investigation, the
27

1 cooperation of the MCSO and Sheriff Arpaio regarding those investigations, and matters
2 related to this action.

3 4. MCSO has provided and the United States has otherwise received
4 information and access relevant to its investigation.

5 5. MCSO and Sheriff Arpaio have allowed and/or offered access to
6 MCSO staff, as well as the MCSO jail facilities set out in the United States August 25,
7 2010 letter to MCSO.

8 6. MCSO and Sheriff Arpaio have also provided voluminous
9 documentation in response to the United States First Request for Documents and
10 Information, despite a disagreement regarding the proper scope of the United States'
11 investigation and the surreptitious tactics the United States employed to obtain
12 information and documents with the use of another federal agency, the Department of
13 Homeland Security ("DHS").

14 7. Despite the unreasonableness and improprieties of the United States'
15 investigation, Sheriff Arpaio has granted the United States access to MCSO staff and
16 facilities as the United States requested in its August 25, 2010 letter, contrary to the
17 United States' contention.

18 8. On the morning of November 9, 2010, a team of DOJ Attorneys from
19 Washington, D.C. met with MCSO command staff and counsel at 4th Avenue Jail.

20 9. At the conclusion of that meeting, a DOJ attorney team began a day-
21 long tour of the Maricopa County Jails.

22 10. Accompanied by Lt. Ernest Alcala and myself, as well as officers
23 assigned to a given facility selected at random, the DOJ team toured Fourth Avenue
24 (including Central Intake), Durango, Estrella, Towers, Lower Buckeye, and In Tents jail
25 facilities—i.e. all of the Maricopa County jail facilities that the United States requested to
26 tour.

27 11. Defense attorneys Joseph J. Popolizio and John T. Masterson also
28 attended the tours.

1 12. MCSO personnel and counsel complied with the DOJ team's every
2 request.

3 13. During the jail tours, the DOJ team spoke directly to MCSO
4 detention officers, all of whom were allowed to speak freely with the U.S. Attorneys.

5 14. As the tours occurred, MCSO detention officers answered the U.S.
6 Attorney team's questions regarding the particular jails, including pods within the jails,
7 jail programs, the provision of medical care, as well as inmate (including LEP inmate)
8 access to programs and medical care.

9 15. Neither defense counsel nor present command staff curtailed the open
10 dialogue between the MCSO officers and the members of the DOJ team.

11 16. In addition, during the facility tours, U.S. Attorney team members
12 also spoke with Correctional Health Services (CHS) personnel, the medical professionals
13 who provide medical care to inmates in the Maricopa County Jail system.

14 17. During the tours, members of the U.S. Attorney team requested
15 medical and grievance forms available at each facility, also. Each request was granted
16 without hesitation.

17 18. Furthermore, I provided the U.S. Attorneys with MCSO duty rosters
18 as requested and pledged to provide inmate rosters the next morning when the U.S.
19 Attorneys were scheduled to commence inmate and command staff interviews.

20 19. Pursuant to the United States' request, inmate interviews were
21 scheduled to occur November 16, 17, 18, 19, 22, 23, 24, and 30, as well as December 2
22 and 3, 2010; these interviews have proceeded as requested, unless the teams of Assistant
23 United States Attorneys and their interpreters altered their requested schedule.

24 20. Each morning, the teams of interviewers received inmate rosters as
25 they requested. The interviewing teams chose the inmates whom they wished to
26 interview.

27 21. MCSO and Sheriff Arpaio has accommodated every request by a
28 DOJ interview team to alter the inmate interview schedule, also.

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SUBSCRIBED AND SWORN before me this 10 day of December 2010 by Sgt.

James Seibert.

Stacy Stotts
Notary Public

My Commission Expires:

June 19, 2011

