

Exhibit 70



U.S. Department of Justice

Office of Professional Responsibility

Washington, D.C. 20530

JUN 15 2010



Dear [REDACTED]

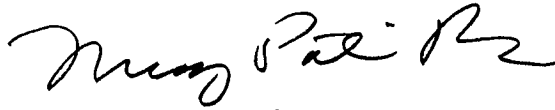
The Office of Professional Responsibility has completed its investigation into allegations that you committed misconduct in connection with the investigation of the Maricopa County Sheriff's Office (MCSO) by the Special Litigation Section (SPL) of the Civil Rights Division (CRT). It was alleged that you violated the rule of professional conduct that prohibits contacts with represented persons by using Department of Homeland Security Office of the Inspector General (DHS OIG) inspectors to interview represented members of the MCSO, and that the investigation was based on improper partisan political considerations. Based upon the results of our investigation, OPR concluded that no CRT attorney violated any professional obligation, and thus did not commit professional misconduct or exercise poor judgment in this matter. No CRT attorney used or attempted to use DHS OIG inspectors to contact represented persons without the knowledge or permission of their counsel, nor did any CRT attorney ask the Community Relations Service to reveal confidential information. Finally, OPR did not uncover any evidence that the CRT investigation of MCSO was driven by improper partisan political considerations. Rather, OPR found that a preliminary inquiry of MCSO was opened in June 2008, during the Bush Administration, based on SPL criteria for opening such inquiries. The February 2009 decision to initiate a formal investigation was also based on evidence sufficient, consistent with SPL standards, to justify the investigation.

We have advised Assistant Attorney General Thomas E. Perez of the results of our investigation. If you require additional information concerning these results, please contact the Office of the Assistant Attorney General.

Please note that we have also advised Robert N. Driscoll, Esq., counsel to complainant MCSO, of our findings.

Thank you for your cooperation with our investigation.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary Patrice Brown".

Mary Patrice Brown
Acting Counsel

cc: Thomas E. Perez
Assistant Attorney General