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Attorney for Defendants Napier, Pima County Board of Supervisors, Nanos,
5 Roher and Krunze

6 UNITED STATES DISTRICT COURT

7 DISTRICT OF ARIZONA

8 Terrence Bressi,
9 Plaintiff,
10 vs.
11 Pima County Board of Supervisors, et al.,
12 Defendants.

Case No. 18-CV-00186-DCB

STATEMENT OF FACTS

13
14 Defendants submit their Statement of Facts in support of their Motion for Summary
15 Judgment as follows:

16 1. Mr. Bressi was arrested on April 16, 2017, for obstructing traffic at the
17 Border Patrol Checkpoint (video April 10, 2017 (filed separately as Exhibit A; transcript
18 attached as Exhibit B).

19 2. Mr. Bressi has been cited by Pima County Sheriff's deputies on four
20 occasions for obstructing traffic on the State Highway and for refusing to move into the
21 secondary. (Bressi deposition, March 8, 2021 p. 38 line 9 through p. 39 line 3; p. 52 line
22

1 24 through p. 61 line 9, attached as Exhibit C.).

2 DATED this 17th day of June, 2021.

3 HUMPHREY & PETERSEN, P.C.

4 /s/ Andrew Petersen

5 ANDREW PETERSEN

6 Attorney for Defendants

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CERTIFICATE OF SERVICE

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8 I hereby certify that on June 17, 2021, I electronically transmitted the attached
9 document to the Clerk's office using the CM/ECF System for filing and transmittal of a
10 Notice of Electronic Filing to the following CM/ECF registrants:

9

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20 Border Patrol, U.S. Office of Border Patrol, Kevin K. McAleenan, Chief
21 Carla L. Provost, Chief Patrol Agent Rodolfo Karisch, United State of
22 America

19 s/Andrew Petersen

20 H:\MHFILES\8006-6\Statement of Facts.docx

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