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Adam N. Bleier
Attorney at Law

August 14, 2017

Ms. Rachel Gigar
Deputy County Attorney
Pima County Attorney's Office
32 N. Stone Avenue, #1400
Tucson, Arizona 85701

RE: State vs. Terrence Harry Bressi
Case No. CR17-706020-MI

Dear Ms. Gigar,

I am sending a second letter requesting disclosure in this case. I sent a previous letter dated July 19, 2017, to which we received no response. Pursuant to Rule 15 of the Az. Rules of Criminal Procedure, Defense requests the following disclosure:

- 1) Any and all video or audio in this case taken by the Pima County Sheriff's Department (PCSD);
- 2) Any and all video and audio recordings provided by Customs Border Protection (CBP) to the PCSD (the existence of such is noted in the reports);
- 3) Any and all incident reports pertaining to this incident by agents of Custom Border Protection including CBP Agents Frye, Lopez, and Fuentes;
- 4) Contact information for CBP Agents Frye, Lopez, and Fuentes who were involved in this investigation and detention of Mr. Bressi;
- 5) Cross certification records pursuant to A.R.S. § 13-3875 authorizing CBP Agents Frye, Lopez, and Fuentes to perform state law duties;
- 6) All PCSD or CBP documentation related to any 8 § USC 1357(g) Attorney General agreement/program in effect between the PCSD and DHS/CBP empowering PCSD officer to enforce federal immigration law;

- 7) All 2017 Operation Stonegarden documentation including Daily Activity Reports from deputies on patrol; training materials; quarterly reports documentation
- 8) Deputy Roher's personnel file;
- 9) Current CBP checkpoint guidelines, procedures and policy including the current policy regarding uncooperative motorists;
- 10) Border Patrol Agent Handbook pertinent to the operation of immigration checkpoints;
- 11) All incident reports, emails, notes and other records in the possession of CBP or the PCSD associated with Mr. Bressi dating back to 2002;
- 12) Operational statistics (including all those involving state and local law violation citations/arrest issued by non-federal law enforcement) compiled by State or federal law enforcement with respect to the SR-86 checkpoint;
- 13) All disciplinary records pertaining to and citizen complaints of illegal detention at the SR-86 immigration checkpoint.

I appreciate your assistance with this request.

Respectfully,

A handwritten signature in black ink, appearing to read 'Adam N. Bleier', with a long horizontal flourish extending to the right.

Adam N. Bleier
Attorney for Mr. Bressi

ANB/mrm



Premier Support Service

02/21/2014

7:46 am

10 E. Broadway Suite 105 Tucson, AZ 85701
Office: (520) 798-2200 Fax: (520) 798-2201

[Reset Form](#)

Firm Name SHERICK & BLEIER, PLLC.		Complete By (Date & Time) 08/14/2017	Special Routine <input type="radio"/>
Address 145 S. 6TH AVENUE		Statute Date	Hearing Date & Time
City, St, Zip TUCSON, ARIZONA 85701		Attorney Name ADAM N. BLEIER	Case Number CR17-706020-MI
Phone# 520-318-3939	Fax# 520-318-0201	Secretary Name MARISOL	Client File#
Court Name PIMA COUNTY JUSTICE COURT		Court County PIMA	Dept/Div

PREMIER
AUG 14 2017
NOV 03

AUG 14 '17 PM 4:14

Case Title STATE VS. TERRENCE HARRY BRESSI

FILING

<input type="checkbox"/> File	<input type="checkbox"/> Issue	<input type="checkbox"/> Conform/Return	<input type="checkbox"/> Serve	<input type="checkbox"/> Return
<input type="checkbox"/> Record	<input type="checkbox"/> Index/Research	<input type="checkbox"/> Copy	<input type="checkbox"/> Certify	
<input type="checkbox"/> Self Addressed, Stamped Envelopes Attached. (Clerk will mail conformed copies)				

Judge's Name	Delivery to Judge? <input type="radio"/> Yes <input type="radio"/> No	Judge's signature Required? <input type="radio"/> Yes <input type="radio"/> No
Appearance Fee Paid? <input type="radio"/> Yes <input type="radio"/> No	if, yes date paid _____	Advance Filing Fees? <input type="radio"/> Yes <input type="radio"/> No

Special Instructions
PLEASE DELIVER TOAY THE ATTACHED LETTER DATED 8/14/17 REQUESTING DISCLOSURE (SECOND REQUEST) TO RACAHEL GIGAR AT THE PIMA COUNTY ATTORNEY'S OFFICE, 32 N. STONE AVE., #1400. THANK YOU!

SERVICE OF PROCESS

Name of Person or Entity to be Served	
Home Address	Work Name and Address
Home Phone	Work Phone
Witness Fees <input type="radio"/> None <input type="radio"/> Attached <input type="radio"/> Please Advance \$ _____	

Service Instructions

DATE COMPLETED

Pickup Information	Delivery Information AUG 14 2017
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