

July 17, 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,

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 Sherriff'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. § 13-875 authorizing CBP Agents Frye, Lopez, and Fuentes to perform state law duties;
- 6) All 2017 Operation Stonegarden documentation including Daily Activity Reports from deputies on patrol; training materials; quarterly reports documentation
- 7) Deputy Roher's personnel file;
- 8) Current CBP checkpoint guidelines, procedures and policy including the current policy regarding uncooperative motorists;

- 9) Border Patrol Agent Handbook pertinent to the operation of immigration checkpoints;
- 10) All incident reports, emails, notes and other records in the possession of CBP or the PCSD associated with Mr. Bressi dating back to 2002;
- 11) Operational statistics (including all those involving state and local law violation citations issued by non-federal law enforcement) from the SR-86 checkpoint
- 12) 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,

Adam N. Bleier
Attorney for Mr. Bressi

ANB/mrm

