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11 **IN THE UNITED STATES DISTRICT COURT**
12 **FOR THE DISTRICT OF ARIZONA**

13 Manuel de Jesus Ortega Melendres, et al.,
14
Plaintiffs,
15 vs.
16 Joseph M. Arpaio, et al.,
17 Defendants.

No. CV 07-02513-PHX-GMS

**DEFENDANTS' NOTICE OF LODGING
DVD OF MCSO PRESENTATION TO A
COMMUNITY GROUP ON MARCH 15,
2014**

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21 NOTICE is hereby given that pursuant to the Court's direction/order given to
22 undersigned counsel during the March 24, 2014 hearing, Defendants Joseph M. Arpaio and
23 the Maricopa County Sheriff's Office ("MCSO") have, on the date set forth below, lodged
24 with the Court the following: (a) a single DVD containing the MCSO's filming of its
presentation to a community group on March 15, 2014.

25 A copy of the DVD is being currently provided to the Plaintiff's representative Dan
26 Pochoda pursuant to the Court's October 2, 2014 Order.

27 By way of background, the following information is provided for the Court's
28 reference:

1 During an MCSO community meeting in District 2 in December of 2013, MCSO
2 Deputy Joaquin Enriquez was approached by “Ms. M.R.” Ms. M.R. was or is, upon
3 information and belief, a person involved with an informal group known by the name of
4 *Dreamer Coalition Group*. Ms. M.R. invited the MCSO to attend and speak at a town hall
5 type of meeting to be held at a future date in early 2014. The MCSO accepted.

6 The town hall meeting hosted by Ms. M.R. took place on Saturday, March 15, 2014 at
7 the *Iglesia Methodista Calvario* church located at 79049 West Indian School Road, Phoenix,
8 Arizona 85033. The meeting was voluntarily attended by the MCSO. The MCSO personnel
9 were the keynote speakers. A representative from the City of Phoenix Police Department
10 also attended.

11 The lodged DVD is roughly 2.5 hours in length. Toward the end of the meeting, an
12 unidentified man sitting next to Ms. Lydia Guzman, the corporate representative of Plaintiff
13 We Are America/Somos America and a witness at the trial of this matter, asked a question of
14 MCSO Chief David Trombi. In response, Chief Trombi explained the Court’s Order, in part,
15 by making an incorrect reference to 14 second longer traffic stops of Latinos and an
16 incomplete reference to two deputies having been found to use race in determining alienage
17 as taught by ICE. Without waiving any privilege, Chief Trombi now knows, understands,
18 and appreciates the full evidentiary basis found by the Court in issuing its injunctive relief.

DATED this 27th day of March, 2014.

SCHMITT SCHNECK SMYTH CASEY & EVEN,
P.C.

s/Timothy J. Casey

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CERTIFICATE OF SERVICE

I hereby certify that on March 27 2014, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

The Honorable G. Murray Snow
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COPY of the foregoing e-mailed and regular mailed
this 27th day of March, 2014, to:

1 Mr. Robert Warshaw
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s/Eileen Henry
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