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# MEMORANDUM

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Date: April 21, 2026

To: The Honorable Chair and Members  
Pima County Board of Supervisors

From: Jan Lesher   
County Administrator

Re: Response from Sheriff Nanos

I am sharing the attached report received on April 21, 2026 from Frazer Ryan Goldberg & Arnold LLP. This document includes Sheriff Chris Nanos' responses to a series of written questions requested by the Pima County Board of Supervisors.

JKL/mp

Attachment

c: Carmine DeBonis, Jr., Deputy County Administrator  
Steve Holmes, Deputy County Administrator  
Chad Kasmar, Deputy County Administrator

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**Frazer Ryan  
Goldberg &  
Arnold LLP**

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Direct 602.200.7342  
jcool@frgalaw.com

April 21, 2026

**Sent Via Email and US Mail**

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Mark Lammers, Esq. ([mdlammers@rllsaz.com](mailto:mdlammers@rllsaz.com))  
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6363 N. Swan Road, Suite 151  
Tucson, Arizona 85718

Dear Patricia and Mark:

I have been engaged to represent Sheriff Chris Nanos in connection with the Pima County Board of Supervisors inquiry detailed in your letter dated April 7, 2026. In the interest of promoting clarity and ensuring an accurate public record, Sheriff Nanos accepts the Board's invitation to respond in writing. I have consulted extensively with Sheriff Nanos about the topics raised in your letter and am authorized to provide the following responses on his behalf.

**Topic No. 1 – The Sheriff's Employment History**

At the outset, allow me to note that A.R.S. § 11-253 does not authorize an unlimited inquisition. Rather, Sheriff Nanos is only obliged to report on those matters "connected with the duties of his office." The Sheriff's duties are defined by A.R.S. § 11-441. They include keeping the peace, arresting and detaining those suspected of criminal activity, preventing and suppressing riots or insurrection, securing county courthouses, overseeing and operating the county jail, and effectuating service of process. That is all. *See* A.R.S. § 11-441(A)(1-8). The Sheriff's statutory duties are distinct from those of a sworn peace officer regulated by the Arizona Peace Officer Standards and Training Board ("AZPOST").

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This distinction is significant because it confirms the Sheriff's employment history is irrelevant to the performance of his duties as an elected official subject to oversight by the Board of Supervisors. Likewise, giving testimony in a civil lawsuit and managing the department's website, are not among the "duties of his office." Nevertheless, in the interest of transparency and in the spirit of cooperation, the Sheriff has authorized me to respond to the Board's questions as follows:

*1. The circumstances of Sheriff Nanos's departure from the El Paso Police Dept.*

Sheriff Nanos resigned from the El Paso Police Department in 1982. At the time of his resignation, he held the rank of corporal. His resignation came in the wake of a dispute with a supervisor over the towing of vehicles. The supervisor wanted to impose a three-day suspension for insubordination. Sheriff Nanos appealed that recommended discipline to the Chief, who found in favor of the supervisor. Rather than accept a three-day suspension, Sheriff Nanos offered to resign in lieu of discipline. The Chief accepted his offer and Sheriff Nanos resigned.

*2. The Sheriff's dates of employment as reflected in application materials, resumes, and prior testimony.*

All documents Sheriff Nanos submitted to the County when he applied show his dates of employment with the El Paso Police Department were from 1976 to 1982, which is accurate. For the Board's reference, I have attached a copy of the resume Sheriff Nanos submitted as **Exhibit 1**.

Some time ago, Sheriff Nanos was alerted that the department's website incorrectly stated he was employed with the El Paso Police Department 1976 to 1984. Upon learning of the error, Sheriff Nanos immediately instructed staff to correct it. Since then, all staff have been instructed that any biographical data about the Sheriff included in public facing communications must be reviewed for accuracy and approved by his office prior to publication.

*3. The Sheriff's prior disciplinary history, including suspensions.*

First, I must reiterate that the Sheriff's minimal disciplinary history is irrelevant to the performance of his official duties. The Sheriff was the subject of robust public scrutiny

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during the election, and the public record includes information about his decorated career as a sworn peace officer. Armed with this information, the voters of Pima County elected him as Sheriff. Whatever the Sheriff did or did not do before being elected is necessarily unrelated to his performance of the duties of his office. Notwithstanding the impropriety of this question, the Sheriff has authorized me to respond as follows.

While employed with the El Paso Police Department, Sheriff Nanos was the subject of various disciplinary actions, which included counseling, reprimands, and suspensions. That discipline, and the actions that gave rise to it, happened more than four decades ago. The Sheriff has little specific recollection of those events. However, the Sheriff notes that when he applied with the county in 1984, he was subject to a standard background check, which included completion of the county job application, interviews of his past employers and personal references, an oral interview, a psychological evaluation, and polygraph testing. Moreover, before he became a certified peace officer in Arizona, his fitness to serve and employment history were thoroughly reviewed by ALEOAC<sup>1</sup>. At every step in the hiring process, the Sheriff was truthful and forthcoming.

Last, I am aware of media reports suggesting Sheriff Nanos was somehow dishonest in sworn deposition testimony he gave in the matter of *Cross v. Nanos*, CV-24-00506-TUC-RCC. Not so. In that deposition, the Sheriff was asked: “Have you ever received discipline as a law enforcement officer?” He responded “Yes.” In a follow-up question, he was asked: “Did you ever receive a discipline that rose to the level of a suspension?” He responded “No.” Bad faith media reports have divorced this testimony from its context to suggest Sheriff Nanos was untruthful about his disciplinary history with the El Paso Police Department. But context matters. Both immediately before and immediately after the question about whether he had ever been suspended, Sheriff Nanos was questioned about the Arizona Peace Officer’s Bill of Rights. As you know the Peace Officer’s Bill of Rights details the substantive and procedural due process rights afforded to *Arizona* law enforcement officers.

It is 100% correct that Sheriff Nanos was never suspended during his four decades of decorated and faithful service with the Pima County Sheriff’s Department (“PCSD”). However, Sheriff Nanos was suspended more than forty years ago while employed by El

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<sup>1</sup> The predecessor credentialing agency to AZPOST.

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Paso Police Department. In the context of his live deposition, Sheriff Nanos did not understand the question related to discipline with a different agency not governed by the Arizona Peace Officer's Bill of Rights.<sup>2</sup> In reviewing the transcript shortly after his deposition, Sheriff Nanos spotted his misunderstanding and promptly notified his attorney. For the Board's reference, I have attached the relevant excerpt from his deposition transcript as **Exhibit 2**.

**Topic No. 2 – The Lappin and Cross Disciplinary Actions**

Before responding substantively, I must note that both Sgt. Cross and former Lt. Lappin have filed lawsuits against the Sheriff in connection with the discipline they received following sustained findings of misconduct. Both lawsuits are ongoing. Because this topic touches on active litigation against the County, any discussion about it should take place in executive session. Moreover, the Sheriff must be mindful of the impact his public statements in response to this inquiry could have on the litigation. I am quite certain the Board would not wish for the public nature of its inquiry to create potential liability for the County in these cases where none currently exists. In addition, personnel matters are typically confidential. It would not be appropriate to discuss the allegations or findings against former Lt. Lappin and Sgt. Cross, nor the department's internal investigative processes, in this public forum. Notwithstanding these considerations, the Sheriff has authorized me to respond as follows.

The disciplinary process for all PCSD employees is rooted in long-settled county policy and well-documented department policy and procedures. Both Sgt. Cross and former Lt. Lappin were suspected of violating department and county policy. Consistent with longstanding department policy, those reports of misconduct were investigated by Internal Affairs and presented to the PCSD's Disciplinary Review Panel. The panel was comprised of members of the PCSD Command Staff, the PCSD Legal Advisor (a member of the County Attorney's Office), members from the PCSD Citizens Advisory Review Board, and various department employee association members. After hearing the evidence, the panel

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<sup>2</sup> The Sheriff's confusion is more than understandable since the *Cross* litigation centers on a disciplinary process begun in 2024 that was governed by Arizona's Peace Officer's Bill of Rights. So, it is difficult to understand what possible relevance the Sheriff's personal experience with a disciplinary process 40 years ago in a different state could have to Cross's claims.

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unanimously sustained the complaints. As discipline, the panel recommended a letter of reprimand for former Lt. Lappin and termination for Sgt. Cross. Because the panel's recommended discipline for Sgt. Cross involved termination, it was reviewed by Sheriff Nanos per policy.

During that review process, Sgt. Cross provided a statement admitting he had violated policy as found by the panel and requested leniency. Specifically, Sgt. Cross asked the Sheriff to issue a formal letter of reprimand in lieu of termination. Because Sgt. Cross appeared to be taking responsibility for his misconduct, Sheriff Nanos reduced the discipline from termination to a letter of reprimand over the objections of his command staff. Despite getting exactly what he wanted, and heedless of his own admissions, Sgt. Cross immediately grieved the lenient discipline he received. Former Lt. Lappin likewise appealed. The twin grievances were submitted to County Human Resources Director, Cathy Bohland, and the grievance committee conducted an independent investigation of both disciplinary decisions. Following that independent investigation, the grievance committee recommended the County Administrator uphold the discipline. The County Administrator adopted the recommendation and denied both grievances.

The implication that the discipline given to Sgt. Cross was somehow "retaliatory" or "uneven" is absurd and unfair. Sgt. Cross was disciplined as a result of a sustained finding that he violated the Hatch Act. Indeed, before any discipline was ever contemplated, Sgt. Cross was notified that his off-duty behavior violated department policy and federal law, and was informally counseled on how to continue his protected speech activity without violating policy. Sgt. Cross ignored that advice and continued to break federal law in violation of department policy. His conduct was reviewed by a diverse panel of independent factfinders who unanimously concluded he had violated the Hatch Act. Those independent adjudicators recommended he be terminated. In an abundance of generosity, and the good faith belief Sgt. Cross had accepted responsibility for his actions, Sheriff Nanos granted Sgt. Cross's request for leniency and reduced his termination to a mere letter of reprimand. In response, Sgt. Cross immediately reversed course, recanted his acceptance of responsibility, and grieved the discipline *he requested*. Even before the committee rejected his grievance, Sgt. Cross filed a lawsuit. Any suggestion that Sheriff Nanos "retaliated" against Sgt. Cross by sparing him from termination (as his peers recommended) blinks at reality.

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Likewise, any suggestion of impropriety or an uneven application of departmental policy in connection with former Lt. Lappin's disciplinary process lacks a basis in fact. Former Lt. Lappin was suspected of multiple violations of PCSD policy based on credible evidence. That evidence merited investigations. So, in an abundance of caution and in keeping with department policy, former Lt. Lappin was placed on administrative leave *with pay* pending completion of the investigations. While on paid leave, former Lt. Lappin was subject to precisely the same policies and requirements as any other department employee on administrative leave. Although she was required to remain available during her normal working hours, her freedom of movement was not restricted, subject only to longstanding departmental requirements governing paid administrative leave. Likewise, although she was ordered not to discuss the ongoing investigation consistent with department policy, she was free to engage in all other protected speech activity, including continuing to campaign against Sheriff Nanos. At the conclusion of the department's investigation, former Lt. Lappin was given a letter of reprimand—the exact punishment the Discipline Review Panel recommended. That discipline was upheld after review when County HR denied her grievance.<sup>3</sup>

To be clear, the allegations made by former Lt. Lappin have been extensively litigated in both federal court and the court of public opinion. Former Lt. Lappin grieved her discipline and that grievance was denied. Former Lt. Lappin filed a lawsuit that has not resulted in any finding of wrongdoing by Sheriff Nanos or the PCSD. The DOJ conducted a review and determined there was no evidence to support an investigation. Moreover, these allegations were reported on by local media exhaustively in the run-up to the 2024 election and were rejected by Pima County voters. Despite all this unrelenting scrutiny, there has never been a sustained finding critical of the department's discipline of former Lt. Lappin. That is no accident.

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<sup>3</sup> In November 2024, the Board of Supervisors referred concerns about former Lt. Lappin's treatment by Sheriff Nanos to the United States Department of Justice. In response, the DOJ looked into the matter and determined there was "no federal predicate for a criminal investigation into the allegations against Sheriff Nanos." A copy of the DOJ's letter confirming this finding is attached as **Exhibit 3**.

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Any appearance of impropriety that resulted from former Lt. Lappin's placement on administrative leave is the unfortunate result of a 2024 change to County policy that allowed county employees to run for county office without leaving their jobs. Before 2024, employees vying for county office were placed on leave without pay to ensure that their political aspirations did not prevent them from doing their jobs nor adversely affect the operation of their department. It is not surprising that the first election following this regrettable change in policy showcased the predictable ways in which active employees running for county office can adversely impact departmental operations.<sup>4</sup> In order to "strengthen" current processes, the Sheriff plans to meet with County Administrator Leshner to discuss amending County Personnel Policy 8-108 to once more allow candidates for county office to be placed on leave without pay until after the election.

**Topic No. 3 – Coordination with Federal Immigration Officials**

The PCSD's interactions with federal immigration officials are primarily governed by Chapter 10, Section XII of PCSD's Rules & Regulations, which can be found on the department's website. The policies speak for themselves. Broadly, they confirm the following:

- PCSD employees do not inquire about how a person entered the U.S. unless that is a valid element of a criminal investigation;
- PCSD employees do not inquire about immigration status while at a school, unless that is a valid element of a criminal investigation;
- PCSD employees do not inquire about immigration status at all during consensual encounters with the public;

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<sup>4</sup> Tellingly, the Board's framing of Sgt. Cross as a "union leader" and former Lt. Lappin as a "Pima County Sheriff Candidate" illustrates the problem. Under state law and county ordinance, Sheriff Nanos is obliged to treat all employees equally and to administer the disciplinary process consistently and evenly. He may not engage in special or disparate treatment for union leaders or his political opponents even though their roles obviously cast any discipline they receive in a more controversial light.

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- PCSD employees do not inquire about the immigration status of purported crime victims or witnesses.

In addition, these policies govern PCSD's interaction and cooperation with federal law enforcement:

- PCSD employees cooperate with federal law enforcement officials when necessary to ensure public safety or law enforcement officer safety;
- PCSD employees do not participate in immigration checkpoints except when necessary to enforce a state or local law;
- PCSD employees will comply with international treaties inasmuch as such treaties require notification of a detention be given to a foreign consulate. However, PCSD employees may not affirmatively inquire whether a detainee is a foreign national unless the detainee volunteers that information or the employee has reasonable grounds to suspect as much.

Consistent with these policies, PCSD no longer allows ICE to assign agents to the Pima County Adult Detention Center ("the Jail"). The Jail also no longer accepts ICE detainers nor administrative warrants from ICE. In general, Sheriff Nanos has promulgated policies aimed at focusing PCSD's resources on ensuring public safety and enforcing state and local laws rather than on federal immigration enforcement. Nevertheless, PCSD remains committed to supporting its federal law enforcement partners when they may require assistance not directly related to immigration enforcement, such as in situations involving public safety (e.g. search and rescue missions) or officer safety.

Regarding communications with federal law enforcement agencies like ICE or USBP, it bears noting that PCSD operates a Public Safety Answering Point ("PSAP") and regularly receives calls from members of the public (including undocumented immigrants) that implicate possible violations of state or local law and / or public safety concerns. Whenever the PSAP receives calls that involve immigration enforcement, per policy those calls are routed to ICE, HSI, or USBP as may be appropriate. This is consistent with Sheriff Nanos' policy of leaving immigration and border enforcement to federal law enforcement. Given Pima County's close proximity to the southern border, the volume of calls received

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at the PSAP but immediately transferred to federal counterparts is significant, perhaps more than 5,000.

Because it became a topic of interest in a public records lawsuit filed by the ACLU, the Sheriff has asked me to address certain statistics that were kept under the prior administration. In furtherance of his support for Operation Stonegarden, the Sheriff's predecessor instructed PCSD communications staff to track the number of calls received by the PSAP related to immigration or border enforcement. That data was then compiled into monthly summaries communications staff provided to Sheriff Napier. Once Sheriff Nanos took office, he instructed communications staff to stop providing those monthly reports to him, which they did. However, unbeknownst to Sheriff Nanos, staff continued to track the contacts but did not provide summaries. When Sheriff Nanos learned that the department was still tracking contacts, he ordered the practice be discontinued. The PCSD is working closely with the ACLU to locate and provide the public records sought in the lawsuit, which includes the tracking data.

Also of note, PCSD is the only agency in Arizona that has declined to mandate its deputies are 287(g) certified, which refers to the program that allows local law enforcement agencies to enforce certain aspects of federal immigration law.<sup>5</sup> Under the Trump administration, this decision has made PCSD ineligible for most federal law enforcement grants, which poses fiscal challenges for the department. However, this step was taken in furtherance of Sheriff Nanos's desire to ensure the PCSD is laser focused on its mission of enforcing state and local laws and ensuring public safety.

Sheriff Nanos intends to promote public awareness of these policies in a variety of ways. These include publishing the policies on the department's website, participating in community events, engaging with local neighborhood watch programs, and in speaking with the media.

**Topic No. 4 – Management of the Department's Budget**

The Board's question unfairly implies that Sheriff Nanos has failed to properly manage the department's budget. Not so. Three of the last five fiscal years, the department has performed under budget. In the two years department expenditures exceeded its budget,

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<sup>5</sup> <https://www.ice.gov/287g>

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the overruns were minimal. Under the Sheriff's management, the department has spent just 95.87% of its budget over a five-year span. The figures below prove the Sheriff's sound fiscal management.

<b>Fiscal Year</b>	<b>Budgeted Expenditures</b>	<b>Actual Expenditures</b>	<b>Difference (Over) / Under</b>	<b>Variance (Over) / Under</b>
FY2021	\$159,492,000	\$155,449,000	\$4,043,000	2.53%
FY2022	\$142,228,000	\$139,984,000	\$2,244,000	1.58%
FY2023	\$154,289,000	\$155,590,000	(\$1,301,000)	(0.84%)
FY2024	\$167,058,000	\$164,065,000	\$2,993,000	1.79%
FY2025	\$170,622,000	\$172,207,000	(\$1,585,000)	(0.93%)
<b>Totals</b>	<b>\$793,689,000</b>	<b>\$787,295,000</b>	<b>\$6,394,000</b>	<b>4.13%</b>

The "repeated instances" mentioned in your letter is an apparent reference to monthly reports given to the Board by the PCSD Finance office. These monthly reports have been provided to the Board for several decades as a tool to help the department and county officials forecast future expenses and revenue. Indeed, the creation and use of these projections has been critical to the department's budgetary fidelity.

Despite the Sheriff's success over the span of his tenure, there are two years where the department exceeded budgetary projections. The first was a 0.84% overrun in FY2023. That overrun should not surprise the Board since the budget was set before the Board approved a 7.5% mid-year pay increase for more than 400 corrections employees. Tellingly, once the Board accounted for the 2023 pay increases driven by the CBIZ salary study, the department's budget was increased by \$12,769,000 for FY2024 (an 8.2% increase). Once the funding caught up to the fiscal reality imposed on the department, it returned a \$2,993,000 surplus in FY2024, more than making up for the \$1,301,000 shortfall in FY2023. The second modest overrun came in FY2025 following a 2.3% baseline reduction in the Sheriff's budget—the third such reduction in as many years. Even so, the combined overruns for FY2023 and FY2025 total just \$2,886,000, which is still \$107,000 less than the surplus returned to the general fund in FY2024. So, over the past three years, the department has operated at a net surplus even without accounting for the \$6,287,000 in surplus returned in FY2021 and FY2022.

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The raw data speaks for itself and attests to the Sheriff's sound fiscal management. No explanation or justification is needed. But make no mistake, from a funding perspective, the department is fighting for the residents of Pima County with one hand tied behind its back. The department is tasked with meeting budgetary expectations while also satisfying a host of unfunded mandates. For example, each year, the department incurs approximately \$2,500,000 in personnel expenses related to valuable (but unbudgeted) county programs such as leave payouts, parental leave, military leave, and bereavement leave. These leave programs reduce available personnel and necessitate costly overtime expenditures by the department to prevent interruptions in service and to maintain public safety. Likewise, because the PCSD's mission is broad and its service area vast, the department has absorbed the unbudgeted expenses of remote duty pay and multilingual compensation for staff residing in the Ajo and Mt. Lemmon areas.

Going forward, the Sheriff remains committed to operating within budget despite these challenges. Nevertheless, it bears mention that the department is not immune from volatility in the consumer economy. Like the community it serves, the department faces significantly increased food costs and ever-rising fuel prices. Only 20% of the Sheriff's budget is allocated for supplies and services. Those funds must be used to provide more than 1.86 million meals each year for detainees in the Jail. As food costs have steadily risen over the past year, so has the cost of feeding detainees. These funds must also maintain the department's motor pool, which is comprised of more than 650 vehicles that require constant maintenance and run on gas, which now costs an average of \$4.46/gallon (unleaded) and \$5.85/gallon (diesel) in Tucson. The historic spike in fuel prices was not something the Board could have foreseen and, as a result, this operational cost increase is not reflected in the department's budget for FY2026.

Last, but critically important, comparing the department's expenditures with its budget is a fundamentally flawed and unfair analysis because it fails to consider the department's net fund impact. Since Sheriff Nanos took office, the department has generated revenues of more than \$40,000,000, which is returned to the general fund and is unaccounted for in this budget analysis. The \$8,000,000 in revenue the department generates each year easily offsets the two modest shortfalls in FY2023 and FY2025. If you include the \$40,000,000 in departmental revenue, the PCSD has returned a \$46.4 million surplus under Sheriff Nanos' stewardship. This performance is the result of hard decisions,

**Frazer Ryan Goldberg & Arnold LLP**

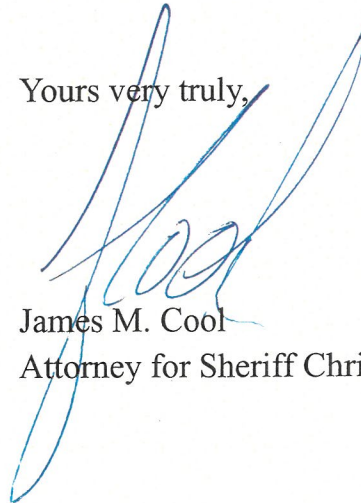
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which include delaying or deferring valuable deputy or corrections training academies, imposing hiring freezes, and limiting purchases to those deemed mission critical and essential to ensuring public and officer safety. Yet, despite myriad and unprecedented challenges, PCSD's Finance Office currently projects a balanced expenditure budget and surplus in revenue for FY2026.

**Conclusion**

The Sheriff appreciates this opportunity to answer the Board's questions and to document his tireless efforts to protect and serve the people of Pima County. Serving as Sheriff is a great honor and he looks forward to achieving even greater success for the department and the public servants who fulfill its mission every day through their hard work and dedication. If the Board requires further information or would like to follow up on the topics discussed in this letter, please contact me and I will work with the Sheriff to provide an appropriate response.

Yours very truly,



James M. Cool  
Attorney for Sheriff Chris Nanos

Encl.

# **EXHIBIT 1**

RESUME

May/1984

Christopher Nanos  
461-17-4440  
1210 S. Turquoise Vista #756  
Tucson, Arizona 85710  
602-206-2610

Date of Birth:  
09-28-55 (28yoo)

Marital Status:  
Divorced

Religion:  
Southern Baptist

Hobbies:  
Boxing, Fishing, Pool, Crosswords, and Physical Exercise

Education:  
Graduate of Parkland High School, (1973), El Paso, Texas. Scholarship student at Midwestern University, in Wichita Falls, Texas, (1973-1974, Speech/Pol. Sci. Major). Also attended the University of Texas at El Paso, (1974-1976, Pol. Sci./Crim. Justice Major). Also attended the El Paso Police Academy, in El Paso, Texas, (Feb. 76-May 76, 16 weeks, Law Enf.). Have amassed over 800 hours of in service Law enforcement training, accredited by the Texas Commission on Law Enforcement Officer Standards and Education. And most recently attended the Pima County Sheriff's Department Corrections Officer Academy (Jan. 84-Feb. 84, 5wks., Tucson, Arizona)

Licenses:  
Arizona Drivers Lic. #T102918, exp. -1986.  
Texas Peace Officers Permanent Lic. #461-17-4440, authority of Art. 4413(29aa)VACS.  
Monadnock PR-24, (defensive police baton) #SS306039, exp. 02-17-85.  
American Heart Ass. Basic Rescue, (CPR & Emergency Cardiac Care), Southern Arizona Division.

Goals & Objectives:  
To advance further in the field of Law Enforcement, utilizing my present knowledge and skills, mixed with the maturity and wisdom that I have attained in the past two years. My main goal, to be Chief of Police, with the realization that you must set certain objectives in order to attain certain goals.

*Certificates:*

*Emergency Vehicles Operations Certificate of Achievement, May-78, El Paso Police Dept.*  
*Police Recruit Training Certificate of Achievement, Feb76-May76, El Paso Police Dept.*  
*Youth Services Operations Certificate of Achievement, May-76, El Paso Police Dept.*  
*City of El Paso Certificate of Service, Oct.-81, El Paso Police Dept.*  
*State of Texas Prosecutor Councils Certificate of Training, Jan-82, State of Texas Prosecutors.*  
*Penal Code and Report Writing Certificate, Jan.-77, Texas Comm. On Law Enf. Stands. & Educ.*  
*Basic Certificate of Law Enforcement, May-75, Texas Comm. On Law Enf. Stands. & Educ.*  
*Basic Crime Prevention Certificate, Nov.-77, Texas Crime Prevention Institute.*  
*Certificate of Appreciation, Nov.-79, Fraternal Order of Police.*  
*Pima County Corrections Officer Basic Certificate, Feb.-84, Pima County Sheriff's Dept.*  
*Certificate of Competency, The Monardnock Pr-24 Police Baton, Feb.-84, Pima County Sheriff's Dept*  
*Certificate of Special Recognition for Defensive Tactics Ability, Feb.-84, Metropolitan Area*  
*Defensive Tactics Instructors Association, (Tucson, Arizona).*

*Work Experience:*

*1976-1982: El Paso Police Department, Patrol Division, Corporal, Step 7.*  
*Duties: Youth Services Division in 1976, Patrol Division in 1977 as a Field Training Officer, Tactical Section as a Armed Robbery Decoy, (undercover), where I was robbed over 40 times in two weeks, netting over 60 Major Felony Arrests, in which all 60 led to convictions. Also served temporary assignments with the Homicide Division, Burglary Division, Sex Crimes Division, and Armed Robbery Division. Also was assigned to Acting Sergeant at the West Side Substation whenever one of the Shift Sergeants was on leave, Sgt. W. Bounvino Supervisor, 1-915-584-2596.*  
*1982-1983: Salesman for the Component Building Corporation, 4863 Cuartel, El Paso, Texas, John DeShazo owner, 1-915-544-0099.*  
*1983-1984: Security Guard for the AAA/Delta Kennels Security Company, 7475 E. Broadway, Tucson, Arizona, Roy Brown, Supervisor, 1-602-886-0171.*  
*January 22, 1984 to the present I am currently employed by the Pima County Sheriff's Department as a Corrections Officer, Sgt. M. Nansel, Sgt. L. Somogyi, Sgt. A. Henton, Lt. C.C. Middleton, supervisors, 1-602-882-2832.*

*Awards and Commendations:*

*1979-OFFICER OF THE YEAR, by the El Paso Police Officers Assoc.*  
*1980-OFFICER OF THE YEAR, FOR THE STATE OF TEXAS-SOUTHWEST REGION, by the Combined Law Enf. Ass. of Texas.*  
*1981-I recieved National recognition for Professionalism and Couragousness displayed in the line of duty, by the Fraternal Order of Police.*  
*1982-I won the Texas State Boxing Championships, (featherweight) at the Police Olympics.*

*Special Achievements:*

While performing for the El Paso Police Department, in the uniformed Patrol Division, I led all other Patrolmen on my shift in every statistical category ever kept, for numerous years. These statistics were kept daily, and existed in total number of felony and misdemeanor arrests, total number of subjects, and vehicles checked, total number of reports taken, both criminal and traffic, total number of calls made and handled, and even the number of field contacts made. Also I helped initiate the opening of the departments first Youth Service Division. And on September 29, 1979, I saved my partners life, while he was being held hostage at gunpoint by a would-be burglar. During my 6 1/2 year tenure with the El Paso Police Department I also received over 30 letters of commendations, ranging from such people as the Mayor, the Chief of Police, other Police Depts., Supervisors, and the general public as well. In fact that many letters in that short of time is like averaging a letter of commendation once every two months, and yet in my first two months on the floor at the Pima County Adult Detention Center I've already received a letter of commendation for professionalism and efficiency while in the performance of my duties. I also graduated from the Pima County Sheriff's Department Corrections Officers Academy with a 93.20% GPA, and top in the class in Physical Fitness and Defensive Tactics.

# **EXHIBIT 2**

Deposition of SHERIFF CHRIS NANOS  
Cross vs Nanos

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

-----X  
Aaron Cross, individually and :  
the Arizona Conference of :  
Police and Sheriffs, an Arizona :  
nonprofit corporation, :  
 :  
 :  
Plaintiffs, : CASE NO. :  
 : CV-24-00506-TUC-RCC  
v. :  
 :  
 :  
Chris Nanos, in his official :  
capacity as Sheriff of the Pima :  
County Sheriff's Department; :  
Juan Carlos Navarro, in his :  
official capacity as Captain :  
of the Pima County Sheriff's :  
Department, :  
 :  
 :  
Defendants. :  
-----X

DEPOSITION OF

SHERIFF CHRIS NANOS

Bosse Rollman PC  
3507 North Campbell Avenue  
Suite 111  
Tucson, Arizona 85719

NONCONFIDENTIAL TESTIMONY

December 11, 2025  
8:59 a.m.

REPORTED BY: CORI A. BRICKEY, RPR  
Arizona CR No. 51030

Deposition of SHERIFF CHRIS NANOS  
Cross vs Nanos

<p style="text-align: right;">Page 6</p> <p>1 Q. Next is, as you know, there's no judge here, 2 so your attorney may lodge objections for the record. 3 This would be him saying something like form and 4 foundation. If this happens, unless he specifically 5 advises you to not answer the question, you'll then 6 proceed to answer the question. 7 Do you understand? 8 A. Yes. 9 Q. So you just pause, let him make whatever 10 objection he needs to make, and then we'll move on 11 after that. 12 A. Okay. 13 Q. Next, you can ask for a break at any time, 14 but if a question is pending, I will ask that you 15 answer the question prior to taking a break; is that 16 fair? 17 A. It is fair. 18 Q. Also, I provide this courtesy to every 19 agency head we depose. Normally, we ask that people's 20 cell phones are off or that if there's an 21 interruption, that doesn't happen. I understand your 22 role and responsibility is unique. If there's 23 something like a shooting or anything else like that, 24 we -- I'm perfectly fine, with an emergency, taking a 25 break.</p>	<p style="text-align: right;">Page 8</p> <p>1 deposition? 2 A. I spoke with my attorney and went over some 3 various documents. 4 Q. You also were here for the entirety of 5 yesterday's deposition? 6 A. Yes, I was. 7 Q. How long were the meeting or meetings that 8 you had with your attorney? 9 A. An hour, I guess. I don't know. I mean, 10 you know, several meetings, so. 11 Q. Okay. Several meetings. Do you know when 12 those meetings were? 13 A. Over the period of the last few weeks. 14 Q. And the total amount of time, you said, was 15 about an hour? 16 A. Yeah, probably. 17 Q. And I think you said that you reviewed some 18 documents. Do you remember what documents you 19 reviewed? 20 A. My -- what do you guys call it? A draft of 21 some sort. I don't know what your term is, but my 22 declarant, I think, is what you used. I reviewed 23 that. I reviewed the letter of reprimand. I 24 reviewed -- pretty much -- that's pretty much it. I 25 mean, I've seen some of the investigative reports but</p>
<p style="text-align: right;">Page 7</p> <p>1 A. I just glance at it. Hopefully, not too 2 long. 3 Q. And that's fine. And if you -- if something 4 does come up, even if there's a question pending, as 5 long as you promise me that you're not going to be 6 talking about the deposition or the question, based 7 off of your role and responsibilities, I'm perfectly 8 fine taking an immediate break; okay? 9 A. Thanks. 10 Q. So next, what did you do to prepare for -- 11 also, the other thing about the conversations with 12 your attorneys. There may be times where I would ask 13 you questions that would potentially elicit a response 14 about a communication that you had with your attorney. 15 If I do that, please don't tell me the 16 content of your communication with the attorney. You 17 can say, "I spoke about this with my attorney." I may 18 ask you when you spoke about it, the duration of the 19 conversations or any documents that you reviewed, but 20 I will not be asking you and please do not provide me 21 with any information, no matter the question, about 22 something that was a conversation with counsel. 23 Do we have that understanding? 24 A. I'll do the best I can. 25 Q. What did you do to prepare for this</p>	<p style="text-align: right;">Page 9</p> <p>1 been quite some time. 2 Q. So it would be fair to say that you saw the 3 investigative reports essentially at the time of the 4 discipline maybe months ago, but you didn't review 5 them specifically to prepare for this deposition; is 6 that fair? 7 A. No, I did not. 8 Q. I do want to get some background in your 9 history as a law enforcement officer. When were you 10 certified as a peace officer? 11 A. I started my career in January of 1976. 12 Q. Was that with Pima County? 13 A. No. That was in El Paso, as a police 14 officer in El Paso, Texas, to eight-and-a-half, nine 15 years later I moved to Tucson and joined the Pima 16 County Sheriff's Department. That was fall of '83, 17 yeah, and then started as a corrections officer. And 18 then about the, I think, summer or fall of '84, I 19 transferred over to deputy. 20 Q. And then I know there's probably a ton, but 21 what positions did you hold as a sworn member of the 22 Pima County Sheriff's Department? 23 A. Just about all of them. There's a ton. I 24 worked patrol, probably worked patrol overall for a 25 little over 10 years. Worked criminal investigations</p>

<p style="text-align: right;">Page 10</p> <p>1 for sex crimes, homicide, narcotics, special 2 investigations, internal affairs. Probably a little 3 over 20 years in investigations. 4 And then, of course, started moving up in 5 rank command positions as the lieutenant for just 6 various district stations. Criminal investigations 7 division commander, internal affairs commander, jail. 8 Pretty much every corner of this department I've 9 worked in. 10 Q. I am always specifically interested in 11 people's experience in internal affairs, so if you can 12 give me some more information on what positions you 13 held in internal affairs. 14 A. I -- over -- well, in internal affairs I was 15 the commander in charge of all the investigative 16 efforts that were done. That was from 2003, to about 17 2005, I think, maybe -6, right in that time frame. 18 Q. And I don't want to make this a memory 19 contest, so I think I'm asking a fair question here. 20 When you were in internal affairs, that predated the 21 Peace Officer's Bill of Rights; is that correct? 22 A. Yes, I'm pretty sure it did. 23 Q. I'm pretty sure it did, too. But it wasn't 24 meant to be -- 25 A. I don't know that, but yes, I would agree</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. What would you say your understanding is of 2 the Arizona Peace Officer's Bill of Rights? Would you 3 consider yourself familiar with the POBR? 4 A. I don't know what you mean by "familiar." I 5 know they exist. I know they exist for the purpose of 6 protecting rights of employees under investigations, 7 particularly internal matters. 8 Q. Did you review the Peace Officer's Bill of 9 Rights when you were considering the investigations 10 and disciplinary actions against Sergeant Cross? 11 A. No. 12 Q. When was the last time, prior to those 13 disciplinary investigations, that you reviewed the 14 Peace Officer's Bill of Rights? 15 A. I don't know that I've ever really reviewed 16 them. I get briefed on a case, and if that's a 17 question that comes up, it's addressed. But I depend 18 on others, too. 19 For example, the commander of the internal 20 affairs division ought to know what those are and how 21 they apply. They may share with me their opinions on 22 certain things, "they" being that commander or anyone 23 else in the chain of internal affairs. And I can 24 either agree or disagree depending on what that was. 25 Q. I have a question to ask, and I promise you</p>
<p style="text-align: right;">Page 11</p> <p>1 with that. 2 Q. And then when did you become the sheriff? 3 A. Oh, man. 2015, I was appointed sheriff by 4 the board of supervisors. And then in 2016, I lost an 5 election. 2020, I came back and won an election. And 6 then -- so really from January 2021, to today I've 7 been the sheriff. 8 Q. With some prior experience before that? 9 A. Yes, sir. 10 Q. What did you do in the interim? Were you 11 still with the sheriff's department? 12 A. No. I did a lot of non-profit stuff. 13 Q. Have you ever received discipline as a law 14 enforcement officer? 15 A. Yes. 16 Q. What is the nature or extent of the 17 discipline that you received? 18 A. Primarily, it would have been like -- I'm 19 not a very good driver. 20 Q. Okay. 21 A. So I had a lot of car accidents so, you 22 know, letter for this or documented verbal for that. 23 Q. Did you ever receive a discipline that rose 24 to the level of suspension? 25 A. No.</p>	<p style="text-align: right;">Page 13</p> <p>1 that I'm not intending at all to be offensive with 2 this question. There's just some interesting 3 deposition testimony in a sister county in Maricopa 4 back in the day with Sheriff Arpaio, where -- so 5 that's kind of what prompts this question, so please 6 don't think that this is insulting. 7 A. Don't compare me to Joe Arpaio and we'll be 8 fine. 9 Q. Well, I'm not going to, and I think you may 10 be very different than him in this, but that's the 11 basis for the reason why I'm asking this question. 12 Do you consider yourself to be still in 13 control of the day-to-day operations of the sheriff's 14 department? 15 A. Absolutely. 16 Q. It's not like you delegated your control to 17 your chief deputy? 18 A. No. 19 Q. You're still -- 20 A. No. I guess the word control is where we're 21 at. For me, I delegate certain functions of the 22 organization for others to deal with and handle and 23 work with, and do it with an expectation that should 24 they believe that they're caught up with something or 25 need help with something, they will bring it back to</p>

# **EXHIBIT 3**



U.S. Department of Justice

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March 11, 2026

Jan Leshner  
Pima County Administrator  
115 N. Church Ave., 2nd Floor, Suite 231  
Tucson, AZ 85701-1317

Dear Ms. Leshner:

We received your letter, dated March 9, 2026, which inquires about the status of an investigation that the Pima County Board of Supervisors requested in November 2024.

According to our records, the former United States Attorney spoke with your chief of staff about this matter on December 20, 2024. At that time, the United States Attorney informed your office that there was not a federal predicate for a criminal investigation into the allegations against Sheriff Nanos, a decision that was made after consultation with our colleagues in Washington D.C.

We have no further response to provide beyond what was already communicated in December 2024.

A handwritten signature in black ink, appearing to read "Tim Courchaine".

Sincerely,

TIMOTHY COURCHAINED  
United States Attorney  
District of Arizona

TC/tah