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

Manuel de Jesus Ortega Melendres,)	CV-07-2513-PHX-GMS
<i>et al.</i> ,)	
)	
Plaintiffs,)	
)	PLAINTIFFS' PROPOSED
v.)	REVISIONS TO THE
)	SUPPLEMENTAL PERMANENT
Joseph M. Arpaio, <i>et al.</i> ,)	INJUNCTION/JUDGMENT ORDER
)	
Defendants.)	
)	
)	

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Pursuant to this Court’s July 20, 2015 Order (Doc. 1179), Plaintiffs submit the following proposed revisions to the Supplemental Permanent Injunction/Judgment Order (Doc. 606) and proposed order.

On April 15, 2015, the Ninth Circuit affirmed “all of the . . . provisions of the injunction as within the discretion of the district court” except the two “particular provisions” that “require[] the Monitor to consider the ‘disciplinary outcomes for *any* violations of departmental policy’ and to assess whether Deputies are subject to ‘civil suits or criminal charges . . . for off-duty conduct.’” *Melendres v. Arpaio*, 784 F.3d 1254, 1267 (9th Cir. 2015) (emphasis in original); *see also* Doc. 606 at 52-53 (¶ 136 (i-j)). The following revisions to subsections (i) and (j) of paragraph 136 narrow the scope of the Supplemental Permanent Injunction/Judgment Order to comply with the Ninth Circuit’s judgment that these provisions be “narrowly tailored to address[] only the relevant violations of federal law at issue.” *Melendres*, 784 F.3d at 1267.

PROPOSED REVISIONS

136. In conducting the outcome assessments, the Monitor should measure not only the MCSO’s progress in implementing the provisions of this Order, but the effectiveness of the reforms. To do so, the Monitor shall take into account the following performance-based metrics and trends:

...

- i. disciplinary outcomes for any violations of ~~departmental policy~~ MCSO Policies and Procedures issued pursuant to this Order or where such violations involve issues related to Discriminatory Policing, unlawful detentions and arrests, immigration enforcement, or violations of the Fourth or Fourteenth Amendments to the United States Constitution;
- j. whether any Deputies are the subject of repeated misconduct Complaints, civil suits, or criminal charges, ~~including for off-duty conduct~~ involving alleged violations of MCSO Policies and Procedures issued pursuant to

this Order, Discriminatory Policing, unlawful detentions and arrests,
immigration enforcement, or violations of the Fourth or Fourteenth
Amendments to the United States Constitution;

....

RESPECTFULLY SUBMITTED this 29th day of July, 2015.

By: /s/ Andre Segura _____

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CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2015, I electronically transmitted the attached document to the Clerk's office using the CM/ECF System for filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail as indicated on the Notice of Electronic Filing.

/s/ Andre Segura