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

Aaron Cross, individually and the
Arizona Conference of Police and
Sheriffs, an Arizona nonprofit
corporation,

Plaintiffs,

vs.

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.

No. 4:24-cv-00506-RCC

**STATEMENT AS DIRECTED BY THE
COURT'S ORDER**

In compliance with the Court's Order entered October 28, 2024, Defendants submit this statement "specifying limitations on the clothing, color, or accoutrements that [Pima County Sheriff's Department ("Department")] off-duty deputies are prohibited from wearing while engaging in political activities."

The Department prohibits deputies from wearing a Department uniform, badge, insignia, or other similar item while engaging in political activities in violation of the Hatch Act. The Department's uniform specifications are contained in Command Directive No. 2024-004, Approved Commissioned Uniform Specifications, and General Order 2024-001 Chapter 8, Appearance, Uniforms, and Equipment. These specifications address both on duty and off duty deputy uniform and appearance standards including types and colors of shirts, pants, footwear, and accessories. Copies of these specifications were attached as Exhibits 7

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1 and 8, respectively, to Sheriff Nanos’ declaration. *See* Doc 8-2 at 27-42; 8-3 at 2-33.

2 Clothing items treated similarly to Department uniforms are a combination of
3 clothing, footwear, and accessories that appear to identify the employee as a Department
4 deputy when worn while engaging in political activities. These clothing items are green or
5 khaki color BDU pants, tan colored boots, a “5.11” type tactical belt with an ammunition
6 magazine and handcuffs, and polo shirt.

7 A polo shirt of any color not worn together with BDU pants, tan boots, and a “5.11”
8 type tactical belt with an ammunition magazine and handcuffs does not create a prohibited
9 appearance, provided no insignia or other identifying logo is on the shirt.

10 Department Deputies may submit questions regarding clothing standards that may or
11 may not be worn during political activities to Uniform Committee Chairman Captain Derek
12 Ogden by phone or email.

13 RESPECTFULLY SUBMITTED October 29, 2024.

14 BOSSÉ ROLLMAN PC

15 By: /s/ Kevin J. Kristick
16 Richard M. Rollman
17 Kevin J. Kristick
Attorneys for Defendants

18 **CERTIFICATE OF SERVICE**

19 I hereby certify that, on October 29, 2024, I electronically transmitted the attached
20 document to the Clerk’s Office using the CM/ECF System for filing and transmittal of a Notice
21 of Electronic Filing to the following CM/ECF registrants:

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