

Arizona

WOMEN IN PRISON: 2,656 (12/03)¹

Custodial Sexual Misconduct

Custodial Sexual Misconduct – Statute

§ 13-1419ⁱ – *Unlawful sexual conduct; correctional employees; prisoners; classification.*ⁱⁱ

Arizona’s law is in the Criminal Code under the Sexual Offenses chapter. **The law considers the inmate guilty of the same offense as the custodian.** Arizona law does not consider violations of this section relevant to background checks for prison guards.

Does the statute impose a criminal penalty on the inmate?	Yes	In order for an inmate to complain about alleged abuse, she would have to admit to committing the same offense. Arizona makes no issue of the inmate’s lack of consent, so even an inmate who was raped could be charged under this law. ⁱⁱⁱ The Arizona Department of Corrections noted in its response to AI that “The Department believes this statute may have a chilling effect on reporting sexual conduct and is seeking legislative support to modify this provision.”
Does the law cover all relevant forms of sexual abuse?	Yes	All forms of sexual contact are covered.
Does the law allow an officer to claim an inmate consented to the sexual act(s) to avoid prosecution?	No	Consent is not an issue.
Does the statute cover all custodians and staff in contact with inmates?	Yes	The law covers employees and contractors of state and private prisons, as well as local jails.
Does the law cover all places where an inmate might be abused?	Yes	The law is not concerned where the abuse took place.
Is the penalty a felony?	Yes	Violation is a class 5 felony.

Custodial Sexual Misconduct – Allegations and Incidents

Indictments/Convictions (answer to AI letter requesting information) ²	The Arizona Attorney General’s Office does not compile statistics on prosecutions or convictions under the state’s CSM legislation. ³
Incidents reported in select media since January 2000	- Pima County Jail: Corrections Officer Vincent W. Best pleaded guilty to five counts of unlawful sexual conduct with a female inmate. Best was working in the medical unit, where the inmate was being treated. (AP, 8/2/03)

ⁱ §13-1419 was amended by the 2001 enactment of HB 2282, which broadened the law’s coverage to include employees of the Department of Juvenile Corrections. §13-1419 was further amended by the 2002 enactment of HB 2335, which, in subsection A, substituted “state department of corrections, the department of juvenile corrections, a private prison facility or a city or county jail or with an offender who is under the supervision of either department” for “department, private prison facility or a city or county jail or with an offender who is under the supervision of the Department.”

ⁱⁱ The text of Arizona’s statute is provided at the end of this section.

ⁱⁱⁱ Amnesty International considers correction of this problem of paramount importance. The retaliation against inmates who report being victims of custodial sexual misconduct has been reported on by AI as well as Human Rights Watch and the US Federal Government. The imposition of criminal liability against an inmate for sexual conduct with a custodian creates an official avenue for such retaliation.

	<ul style="list-style-type: none"> - ASPC-Perryville Prison Facility: A Department of Corrections officer was accused of smuggling drugs into a prison and having a sexual relationship with an inmate. The DOC referred the matter for criminal prosecution. While a state Grand Jury initially charged the officer with a 10-count felony indictment, including unlawful sexual conduct of correctional employees, the Attorney General declined prosecution. (<i>AP</i>, 4/18/02 and <i>Letter from the Arizona DOC</i>, 12/20/05) - Maricopa County: Patrol deputy Stephan Paul Sexton was arrested and charged with having sexual relations with at least two shackled female inmates in jail holding cells and elevators. Criminal proceedings were filed and he was charged with 12 Counts. He pleaded guilty to two counts of Unlawful Sexual Conduct, a Class 5 Felony before the Superior Court of Arizona. He was sentenced to 6 months suspended jail sentence. He was also ordered to serve lifetime probation, register as a sex offender, continue to participate in counseling, complete community work service and not to have any contact with the victims.⁴ (<i>AP</i>, 1/18/02; <i>The Arizona Republic</i>, 01/19/02) - A juvenile center chief was investigated for placing a camera in the female shower area and for sexually harassing a female inmate. (<i>AP</i>, 09/11/01) - An individual posing as a federal agent was given an office in the Sheriff's Department, which enabled him to gain access to a jail where he fondled two female inmates. He was sentenced to 5 years' imprisonment in December 1997. The charges were dropped in 2001. (<i>KPHO-TV Video Monitoring Service of American</i>, 12/6/97; <i>The Arizona Republic</i>, 06/17/01)
Other Reported Incidents	<p>ASPC-Perryville Prison Facility: A Department of Corrections officer was accused in 2004 of assaulting a female inmate several times over a period of time when he was supervising her. The officer resigned while under investigation. The Arizona DOC sustained the inmate's allegations and referred the case to the Maricopa County Prosecuting Attorney's Office which presented it to a state Grand Jury. Reportedly, the Grand Jury declined to indict the officer. <i>Letter from Arizona DOC</i>, 12/20/05</p>

	<p><i>United States v. Arizona</i>^{iv}</p> <p>In March 1997, the US Department of Justice initiated a lawsuit against the State of Arizona for failing to protect female inmates from sexual misconduct by correctional staff. The lawsuit alleged that inmates were subjected to sexual relations, sexual assaults, sexual touching and fondling, and frequent viewing during dressing, showering and use of the toilet facilities. The DOC settled the lawsuit in 1999 by agreeing to carry out new preventative policies.</p> <p>AI previously noted that the settlement was problematic in a number of respects: it failed to afford the women confidentiality when reporting sexual abuse; failed to provide for independent monitoring of cases of abuse; and permitted Arizona DOC to hold an inmate who has made an allegation of sexual misconduct in “investigative detention” for up to 30 days. AI has concerns that conditions in “investigative detention” are restrictive and therefore punitive.</p> <p>According to the Arizona DOC, the Department implemented the terms of the settlement into policy by November 1999 as Department Order 120. The DOC reported that they have undertaken a review of DO 120 to incorporate prior feedback from Amnesty International. ADOC notes that DO 120 section 120.01 provides the complaining inmate is assured confidentiality. The DOC also states that while the agreement has now expired, the Department’s recently established Office of Women’s Services is currently conducting an evaluation of all security practices impacting the female population, which may result in further modifications of policy and procedure.⁵</p> <p><i>AI welcomes the initiatives and continuing work undertaken by ADOC and urges the Department to fully bring all policies and procedures into line with international standards.</i></p>
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Custodial Sexual Misconduct – Policies, Procedures and Practices of Guarding Specific to Women

The following is based on data provided by the Arizona Department of Corrections in response to AI’s survey in 2005. AI did not receive data from the Arizona Department of Corrections in 2000 and 2002. Additional information from other sources is included where available.

<p>Is the current Department of Corrections policy on custodial sexual misconduct language explicit?</p>	<p>Yes</p>	<p>According to the Arizona DOJ, Department Order 120 provides explicit language for Inappropriate Staff-Inmate Relationships and Serious Sexual Misconduct. These definitions include sexual contact, oral sexual contact and sexual intercourse. Staff are prohibited from engaging in these behaviors.⁶ Furthermore, other conduct including undue familiarity, intimate contact and inappropriate behavior with an inmate are also punishable offenses.⁷ The Arizona DOC reported that Department policies are in the process of revision to comply with the Prison Rape Elimination Act.⁸</p>
<p>Allow cross-gender pat-down searches?</p>	<p>Yes</p>	<p>Male officers are prohibited from pat-searching female inmates except in emergency situations. The DOC specifically requires that should a pat search be conducted by a staff member who is not the same gender as the inmate, it shall be conducted in the presence of at least one additional staff member.⁹</p>
<p>What is the percentage of female officers in relation to male officers?</p>		<p>According to the Arizona DOC, the Department-wide ratio for male to female Correctional Officers is 73.6% male and 26.4% female.¹⁰ No ratio for prisons housing female inmates was provided.</p>

^{iv} The settlement agreement is reprinted at the end of this section.

Restrictions on the duties of male guards?	Yes	<p>According to the Arizona DOC, policy implemented pursuant to the DOJ settlement specifically requires that staff and inmates receive information and training about preserving inmates' privacy. The policy includes in its definition of privacy that, "... female inmates not to be viewed by male staff while dressing, showering or toileting absent a legitimate security interest that cannot reasonably be accomplished by female staff." According to the Arizona DOC, the Department has installed privacy screens on the showers and doors on the toilet stalls in all female institutions.¹¹</p> <p>Arizona DOC reports that policy implemented pursuant to the DOJ settlement requires staff to receive information and training to ensure that male staff "knock and announce" their presence where female inmates may be in a state of undress. The DOC further provides direction to staff to momentarily pause after announcing their presence before actually entering the area.¹²</p>
Staff training on sexual misconduct?	Yes	<p>According to the Arizona DOC, policy implemented pursuant to the DOJ settlement requires that all Department staff, contract staff and correctional volunteers receive pre-service and annual in-service training about approved staff-inmate interactions and those that are disallowed, including sexual misconduct. Reportedly, Department training is in the process of revision to comply with the Prison rape Elimination Act of 2003.¹³</p>
Inform inmates of agency policies and reporting procedures on sexual misconduct?	Yes	<p>According to the Arizona DOC, policy implemented pursuant to the DOJ settlement policy requires that female inmates receive instruction about reporting sexual misconduct during Orientation as well as a handbook to which they can refer to throughout their incarceration.¹⁴</p>

Custodial Sexual Misconduct - Policies and Procedures

Guiding Official Response

The following is based on the Arizona Department of Corrections response to AI's survey in 2005, please see above

Is medical help available for the victim of alleged sexual abuse?	Yes	<p>According to Arizona DOC, victims of alleged sexual abuse are transported immediately to the closest hospital for treatment.¹⁵</p>
Are immediate mental health services available for the victim of alleged sexual abuse?	Yes	<p>According to the Arizona DOC, mental health staff contacts the victim immediately upon return from the hospital. Many hospitals where inmates are treated also offer victims immediate assistance.¹⁶</p>
Is counseling available for the victim of alleged sexual abuse?	Yes	<p>According to the Arizona DOC, mental health staff also provides counseling and other services.¹⁷</p>
Is a rape kit taken?	Yes	<p>According to the Arizona DOC, a rape kit is administered by hospital medical staff.¹⁸</p>
Are there special procedures for investigating allegations of sexual misconduct?	Yes	<p>According to the Arizona DOC, policy implemented pursuant to the DOJ settlement provides specific instruction about investigating sexual assaults.¹⁹ In accordance with the settlement, department investigators are required to interview all potential witnesses, victims and suspects, including inmates who live or work with the alleged victim and staff who work with the alleged suspect.²⁰</p> <p>It is stated in the DOJ settlement that Arizona DOC will continue to routinely offer inmates and staff the opportunity of polygraph examinations to support their contentions. The settlement also stipulates that all investigations are to be completed with 30 days.</p> <p>According to the Arizona DOC, further modification of policy is expected to occur as the departmental order implementing the</p>

		Prisoner Rape Elimination Act is promulgated. ²¹
Is there a system for reporting allegations of custodial sexual misconduct within the DOC?	Yes	<p>As part of the DOJ settlement, Arizona DOC was required to appoint a “Female Programs Administrator,” whom inmates can write with allegations of inappropriate staff behavior. The Arizona DOC informed AI that policy implemented pursuant to the settlement specifically provides procedures for inmates to report inappropriate staff behavior in person and in writing. The policy established a position to whom female inmates are encouraged to report inappropriate staff behavior. Reportedly, the DOC installed secured mail boxes at the facilities to ensure timely and confidential communication.²²</p> <p>Arizona DOC also informed AI that with the establishment of the Office of Women’s Services, the DOC is conducting monthly “forum” meetings with inmate representatives from every unit in which women are housed to address issues of concern to the population. The DOC states, “We are optimistic that the women will raise issues of increasingly sensitive nature over time and that staff and offenders will tackle them together.”²³</p> <p>Furthermore, the Arizona DOC reports that the Department recently established the Office of Constituent Services, staffed by the Constituent Services Officer, charged with meeting with inmates, evaluating grievances and identifying root causes of legitimate concerns for immediate resolution.</p>
Is there a system for reporting allegations of custodial sexual misconduct directly to a body external to the DOC?	No	No details provided.
Is the investigation external?	No	According to the Arizona DOC, Department investigators conduct the investigation per the request of the county. The DOC reports that all the officers are POST certified peace officers.
If there is an external investigation, how is it triggered?		The prosecuting attorney in the county in which the crime occurred is notified and on occasion will assume responsibility as the lead investigative agency.
Are special measures taken to shield alleged victims from retaliation?	Yes	According to the Arizona DOC, policy implemented pursuant to the DOJ settlement prohibits staff from retaliating against alleged victims. Acts of retaliation are reportedly investigated and employees who engage in this behavior are subject to discipline. Further, staff accused of “serious sexual misconduct” is reassigned or placed on leave pending the outcome of the investigation. Inmates may be separated from the general population pending the outcome of the investigation on a case by case basis “as circumstances warrant.” ²⁴
If so, do the measures include solitary confinement or lock-down of the inmate?	Yes	According to the Arizona DOC, policy implemented pursuant to the DOJ settlement allows for inmates to be placed in a cell pending completion of the investigation. The DOC reports that inmates are not placed in solitary confinement, and that the detention is not intended to be punitive in nature. Reportedly the policy requires staff to take all reasonable measures to ensure that inmates are afforded all the privileges of their classification. The DOC notes that this provision is included in the review of Department policies and practices by the Office of Women’s Services. ²⁵
Is there an independent body, such as a corrections ombudsman, with independent oversight of correctional facilities and the DOC?	--	Arizona DOC referred AI to the Joint Select Committee on Corrections established per ARS §41-1610.03 and §41-1610.04, and composed primarily of members of the state legislature. According to the Arizona DOC, it makes recommendations to the legislature and the DOC regarding prison operations, policies, practices and

		<p>prison construction. It is unclear whether the Committee also receives or investigates complaints directly from inmates.²⁶</p> <p>Furthermore, the Arizona DOC reports that the Department has developed several advisory groups. These include the Constituent Services Advisory Committee which is co-chaired by the Constituent Services Officer (see above) and the Department Director, and is composed of advocates, attorneys, service providers and ex-offenders. There is reportedly also a health services advisory committee to ensure the Department adopts the field's best practices, and a victims' services advisory group whose scope of review includes staff who are victims of workplace violence and offenders who are victims of sexual assault.²⁷</p>
Is there a system in place to track investigations, indictments and convictions for custodial sexual misconduct?	Yes	<p>According to the Arizona DOC, policy implemented pursuant to the DOJ settlement requires the administrative and criminal investigative units to track, "at a minimum, investigations completed, database queries, the number of cases in which investigations sustained employee misconduct and the type of misconduct and the number of cases in which employees were exonerated to the allegations were not sustained. The Arizona DOC notes that further modification of the policy is expected to occur in accordance with the Prison Rape Elimination Act.²⁸</p>

Custodial Sexual Misconduct – Pending Legislative Proposals

None

Pregnancy in Custody

Pregnancy - Statute

Legislation banning shackling in the third trimester or during labor	No	Arizona has no legislation limiting the use of shackling on pregnant inmates.
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Pregnancy - Policies, Procedures and Practices

The following is based on the Arizona Department of Corrections response to AI's survey in 2005, please see above.

Use of restraints in third trimester	Yes	Pregnant inmates may be restrained during their third trimester. According to the Arizona Department of Corrections, its policy does not cover this issue. The DOC stated that by practice, pregnant inmates are not routinely shackled, but may be restrained in front of their torso, as security requires. The DOC noted that the recently established Office of Women's Services is currently conducting an evaluation of all security practices impacting the female population, and stated that its review may result in modifications of policy and procedure. ²⁹
Restraints during transport	Yes	According to Arizona DOC, by practice, pregnant inmates are to be restrained in handcuffs in front of their torso. No leg-irons or belly chains are to be used. ³⁰
Restraints during labor	Yes	According to the Arizona DOC, inmates are not routinely restrained during labor, but may be restrained. The DOC stated that by practice, restraints are removed during labor per the physician's request and a form requesting removal is signed. ³¹
Officer in delivery room	Yes	According to the Arizona DOC, the Department complies with

	hospital protocol. The DOC stated that usually the officer remains outside the delivery room. ³²
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Contact information

ARIZONA DEPARTMENT OF CORRECTIONS

Director Dora B. Schriro 1601 West Jefferson St. Phoenix, Arizona 85007 Phone: (602) 542-5537 Fax: 602-524-4240 Email: DIRECTOROFFICE@adc.state.az.us	Homepage: http://www.adc.state.az.us/
Office of Women's Services Administrator Ellen Kirschbaum 1601 West Jefferson St. Phoenix Arizona 85007 Phone: (602) 364-2405 Email: ekirsch@azcorrections.gov	

ARIZONA DEPARTMENT OF CORRECTIONS FACILITIES FOR WOMEN

Arizona State Prison Complex Perryville, including Southern Arizona Correctional Release Center (SACRC) in Tucson <i>Female inmates: 1,632 (02/01)³³</i> Warden Denny Harkins P.O. Box 3000; Goodyear, AZ 85338-0901 Phone: (623) 853-0304; Fax: (623) 853-0304 ext 6111
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ARIZONA EXECUTIVE

Governor Janet Napolitano [R] State Capitol 1700 West Washington Phoenix, AZ 85007 Phone: (602) 542-4331; Fax: (602) 542-7602	Homepage: http://www.governor.state.az.us/ Elected: January 2002
Attorney General Terry Goddard 1275 W. Washington Street, Phoenix, AZ 85007 Phone: (602) 542-5025/ (888) 377-6108 Fax: 602-542-4085 Email ag.inquiries@ag.state.az.us	Home page: http://www.attorneygeneral.state.az.us/ Elected: 2002

LEGISLATIVE INFORMATION

<p>Legislative Session: Regular sessions begin on the second Monday in January. They adjourn no later than Saturday of the week in which the 100th day from the beginning of the session falls. President of the Senate and Speaker of the House may extend the session by 7 days. Thereafter a majority vote of members of each house may extend the session. The Governor may call an unlimited amount of special sessions.</p> <p>Senate: 30 members, 2 year term (8 yr max) House: 60 members, 2 year term (8 yr max) Elections for all positions are held in even numbered years.</p>	<p>Legislative information home page: http://www.azleg.state.az.us/</p> <p>Bill Search: http://www.azleg.state.az.us/legtext/bills.htm</p> <p>Bill information phone numbers: House: (602) 542-4221 Senate: (602) 542-3559</p>
<p>Senate 1700 West Washington Phoenix, AZ 85007 Phone: (520) 628-6593/ (520) 628-6596 Fax # (602) 542-3429</p>	<p>Home Page: http://www.arizonasenate.org/</p>
<p>House of Representatives 1700 West Washington Phoenix, AZ 85007 Phone: (520) 628-6593/ (520) 628-6596 Fax: (602) 542-4511</p>	<p>Home Page: http://www.arizonasenate.org/</p>

WOMEN IN PRISON - NGO RESOURCES

The organizations listed are not endorsed by or affiliated with Amnesty International.

<p>Arizona Civil Liberties Union P.O. Box 17148 Phoenix, AZ 85011 Phone: (602) 650-1967 Website: www.acluaz.org</p>
<p>Middle Ground Prison Reform. 139 East Encanto Drive Tempe, AZ 85281 Phone: (480) 966-8116, Fax: (480) 966-3885 Website: www.middlegroundprisonreform.org PROGRAMS: Advocacy, litigation, and referral information for families who have a member in prison. Also offers public education and training seminars for families coping with imprisonment; lobbies for criminal justice and prison reform; litigates for the rights of prisoners and their supporters; publishes a periodic newsletter; and provides specialized paralegal services for inmates and their families; represents prisoners at Clemency Board hearings.</p>
<p>American Friends Service Committee The Criminal Justice Program 103 North Park Ave, Suite 109 Tucson, AZ 85719 Phone: (520) 623-9141; Fax: (520) 623-5901 Email: afcaz@afsc.org Website: www.afsc.org/az/criminal-justice.htm Services: Abolition of the death penalty, prison conditions, sentencing policy, prison expansion, prison privatization, and discrimination against ex-prisoners. The Criminal Justice Program provides resources for prisoners, ex-prisoners, and their family members to find information to address their questions and needs, and is a place to get involved in bringing their voices to the seats of power in Arizona.</p>

Navajo Nations Corrections Project
Department of Behavioral Health Services, Navajo Nation
PO Drawer 709
Window Rock, AZ 86515
Phone: (928) 871-6234

Services: A tribally funded program providing American Indian inmates in tribal, state, and federal prisons access to traditional religious ceremonial practices. Promotes Native inmates' dignity and recovery through access to culturally appropriate religious rites and works to defend basic human and civil rights already guaranteed to non-Native inmates: the free practice of their religions.

Arizona's Custodial Sexual Misconduct Statute

13-1419. *Unlawful sexual conduct; correctional employees; prisoners; classification*

A. A person who is employed by the state department of corrections, a private prison facility or a city or county jail or who contracts to provide services with the state department of corrections, a private prison facility or a city or county jail commits unlawful sexual conduct by engaging in oral sexual contact, sexual contact or sexual intercourse with a prisoner who is in the custody of the [state department of corrections](#), the [department of juvenile corrections](#), a private prison facility or a city or county jail or with an offender who is under the supervision of [either](#) department or a city or county.

B. A prisoner who is in the custody of the state department of corrections, a private prison facility or a city or county jail or an offender who is on release status and who is under the supervision of the state department of corrections or a city or county commits unlawful sexual conduct by engaging in oral sexual contact, sexual contact or sexual intercourse with a person who is employed by the state department of corrections, a private prison facility or a city or county jail or who contracts to provide services with the state department of corrections, a private prison facility or a city or county jail.

C. This section does not apply to:

1. A person who is employed by the state department of corrections, a private prison facility or a city or county jail or who contracts to provide services with the state department of corrections, a private prison facility or a city or county jail or an offender who is on release status if the person was lawfully married to the prisoner or offender on release status before the prisoner or offender was sentenced to the state department of corrections or was incarcerated in a city or county jail.

2. An offender who is on release status and who was lawfully married to a person who is employed by the state department of corrections, a private prison facility or a city or county jail or who contracts to provide services with the state department of corrections, a private prison facility or a city or county jail if the marriage occurred prior to the offender being sentenced to the state department of corrections or incarcerated in a city or county jail.

D. Unlawful sexual conduct is a class 5 felony.

¹ Bureau of Justice Statistics, *Prisoners in 2003*, NCJ205335, November 2004, available at <http://www.ojp.usdoj.gov/bjs/pub/pdf/p03.pdf>, as per 01/27/06.

² The information does not reflect prosecutions or convictions under rape statutes.

³ Letter from Daniel P. Schaack, Assistant Attorney General, Arizona Attorney General's Office, 07/17/02 and Theodore Campagnolo, Assistant Attorney General, 08/24/05.

⁴ Clerk of the Superior Court of Maricopa County Minute Entries, available at <http://www.courtminutes.maricopa.gov/scripts/meeds/qreturn.asp> as per 01/27/06.

⁵ Letter from Dora Schriro, Director, Arizona DOC, 12/20/05

⁶ Letter from Dora Schriro, Director, Arizona Department of Corrections (DOC), 12/20/05 citing Department Order 501, Employee Professionalism and Ethics, Section 501.02, 1.2.

⁷ Letter from Dora Schriro, Director, Arizona DOC, 12/20/05, citing Department Order 508, Employee Discipline, Attachment C, Section 3.

⁸ Letter from Dora Schriro, Director, Arizona DOC, 12/20/05.

⁹ Letter from Dora Schriro, Director, Arizona DOC, 12/20/05, citing Department order 708, Searches.

¹⁰ Letter from Dora Schriro, Director, Arizona DOC, 12/20/05.

¹¹ Letter Dora Schriro, Director, from Arizona DOC, 12/20/05, citing Department Order 120.

¹² Letter from Dora Schriro, Director, Arizona DOC, 12/20/05, citing Department Order 120.

¹³ Letter from Dora Schriro, Director, Arizona DOC, 12/20/05, citing Department Order 120.

¹⁴ Letter from Dora Schriro, Director, Arizona DOC, 12/20/05, citing Department Order 120.

¹⁵ Letter from Dora Schriro, Director, Arizona DOC, 12/20/05.

¹⁶ Letter from Dora Schriro, Director, Arizona DOC, 12/20/05.

¹⁷ Letter from Dora Schriro, Director, Arizona DOC, 12/20/05.

¹⁸ Letter from Dora Schriro, Director, Arizona DOC, 12/20/05.

¹⁹ Letter from Dora Schriro, Director, Arizona DOC, 12/20/05, citing Department Order 120, Section 120.05.

²⁰ Letter from Dora Schriro, Director, Arizona DOC, 12/20/05.

²¹ Letter from Dora Schriro, Director, Arizona DOC, 12/20/05.

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- ²² Letter from Letter from Dora Schriro, Director, Arizona DOC, 12/20/05, citing Department Order 120.
- ²³ Letter from Dora Schriro, Director, Arizona DOC, 12/20/05.
- ²⁴ Letter from Dora Schriro, Director, Arizona DOC, 12/20/05.
- ²⁵ Letter from Dora Schriro, Director, Arizona DOC, 12/20/05.citing Department Order 120, Section 120.06.
- ²⁶ Letter from Dora Schriro, Director, Arizona DOC, 12/20/05.
- ²⁷ Letter from Dora Schriro, Director, Arizona DOC, 12/2005.
- ²⁸ Letter from Dora Schriro, Director, Arizona DOC, 12/20/05, citing Department Order 120, Section 120.08, 1.2.
- ²⁹ Phone conversation with Brian D. Schneider, Attorney General Liaison, Legal Services, Arizona DOC, 02/12/01.
- ³⁰ Phone conversations with Rhonda Cole, Public Information Officer, Arizona DOC, 09/27/00 and Brian D. Schneider, Attorney General Liaison, Legal Services, 02/12/01.
- ³¹ Phone conversations with Brian D. Schneider, Attorney General Liaison, Legal Services,Arizona DOC, 11/09/00 and 02/12/01.
- ³² Phone conversations with Brian D. Schneider, Attorney General Liaison, Legal Services, Arizona DOC, 11/09/00 and 02/12/01.
- ³³ Phone conversations with Brian D. Schneider, Attorney General Liaison, Legal Services, Arizona DOC, 11/09/00 and 02/12/01.