

SETTLEMENT AGREEMENT

United States District Court, District of Arizona, #CIV 01-01463 PCT-JAT

(United States Court of Appeals for the Ninth Circuit, #03-15915)

I. INTRODUCTION

This Settlement Agreement (“Agreement”) is made and entered into by and between Veronica Arnold, Tonya Arrington, Anthony Dorsett, Vincent Edwards, Barrington Folkes, Jim Lee, Jesus Sagrero, Raul Salazar, Gregory Stephen, Frank Vilas, the Plaintiff Class as defined below, (hereinafter “Plaintiffs”), and the Arizona Department of Public Safety (“DPS” or “Agency”), Governor Janet Napolitano, DPS Director Dennis Garrett, DPS Lt. Colonel William Reutter, DPS Ofc. John Adams, DPS Sgt. Jeff Brownlee, DPS Ofc. Casey Kasun, DPS Ofc. Howard McDonald, and DPS Ofc. Steven Shroufe (hereinafter “Defendants”).

WHEREAS, on August 6, 2001, Plaintiffs filed a class action complaint alleging that DPS engaged in a continuing pattern and practice of race-based traffic stops, detentions and searches of non-Caucasian motorists;

WHEREAS, Plaintiffs’ claims were brought pursuant to the Fourth and Fourteenth Amendments to the Constitution of the United States; 42 U.S.C. §1983, and Title VI of the Civil Rights Act of 1964, 42 C.F.R. §§ 42.101 et. seq;

WHEREAS, Plaintiffs’ class action was brought pursuant to Rule 23(a) and Rule 23(b)(2) of the Federal Rules of Civil Procedure (“FRCP”), on behalf of themselves and all other persons similarly situated. Each individual class