

ADDENDUM MATERIAL

DATE 3-24-26

ITEM NO. ADD4+5

In the Matter of:

Cross vs Nanos

Transcript of:

SHERIFF CHRIS NANOS

December 11, 2025

**Colville & Dippel**  
LLC

1309 E Broadway Blvd  
Tucson, AZ 85719

☎ 520.884.9041

☎ 520.623.1681

ArizonaDepos.com

WUN

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; margin-bottom: 0;">Page 2</p> <p>1 The deposition of SHERIFF CHRIS NANOS, noticed by 2 the Plaintiffs, was taken on December 11, 2025, from 3 8:59 a.m. to 3:36 p.m., at the offices of Bosse 4 Rollman PC, 3507 North Campbell Avenue, Suite 111, 5 Tucson, Arizona 85719, before Cori A. Brickey, Arizona 6 Certified Reporter No. 51030.</p> <p>7</p> <p style="text-align: center;">8 APPEARANCES OF COUNSEL</p> <p>9 FOR THE PLAINTIFFS:</p> <p>10 STEVEN J. SERBALIK PLC By: Steven J. Serbalik, Esq. 11 Aaron Lentz, Paralegal 4925 East Desert Cove Avenue 12 Unit 116 Scottsdale, Arizona 85254 13 (480)269-1529 steveserbalik@gmail.com</p> <p>14</p> <p>15 FOR THE DEFENDANTS:</p> <p>16 BOSSE ROLLMAN PC By: Kevin Kristick, Esq. 17 3507 North Campbell Avenue, Suite 111 Tucson, Arizona 85719 18 (520)320-1300 kristick@bosserollman.com</p> <p>19</p> <p>20</p> <p>21 ALSO PRESENT: Aaron Cross, Plaintiff David Stone, AZCOPS</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right; margin-bottom: 0;">Page 3</p> <p style="text-align: center;">1 INDEX OF EXAMINATION</p> <p>2 WITNESS: SHERIFF CHRIS NANOS</p> <p>3 EXAMINATION PAGE</p> <p>4 By Mr. Serbalik 4</p> <p>5</p> <p>6</p> <p>7</p> <p style="text-align: center;">8 INDEX OF EXHIBITS</p> <p>9 EXHIBIT NO. : PAGE</p> <p>10 Exhibit 1 Declaration of Chris Nanos 109</p> <p>11 Exhibit 4 Uniform Policy 31</p> <p>12 Exhibit 6 Photograph 91</p> <p>13 Exhibit 8 Lieutenant O'Connor Memo 98</p> <p>14 Exhibit 9 Photograph 88</p> <p>15 Exhibit 22 Hatch Act 129</p> <p>16 Exhibit 25 Media Release 125</p> <p>17 Exhibit 28 Text Document 230</p> <p>18 Exhibit 29 Ordinance 238</p> <p>19</p> <p style="text-align: center;">20 CONFIDENTIAL TESTIMONY</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%;">21 PAGE</td> <td style="width: 10%;">LINE</td> <td style="width: 10%;">to</td> <td style="width: 25%;">PAGE</td> <td style="width: 10%;">LINE</td> </tr> <tr> <td>22 33</td> <td>20</td> <td></td> <td>34</td> <td>3</td> </tr> <tr> <td>23 114</td> <td>10</td> <td></td> <td>119</td> <td>1</td> </tr> </table> <p>24</p> <p>25</p>	21 PAGE	LINE	to	PAGE	LINE	22 33	20		34	3	23 114	10		119	1
21 PAGE	LINE	to	PAGE	LINE												
22 33	20		34	3												
23 114	10		119	1												
<p style="text-align: right; margin-bottom: 0;">Page 4</p> <p>1 SHERIFF CHRIS NANOS, 2 of lawful age, having been first duly sworn to testify 3 to the truth, the whole truth, and nothing but the 4 truth in the case aforesaid, deposes and says in reply 5 to oral interrogatories propounded as follows, to wit: 6 DIRECT EXAMINATION 7 BY MR. SERBALIK: 8 Q. Hi, Sheriff. As you know, I'm Steve 9 Serbalik. I represent the plaintiffs in this 10 case. Some of this stuff will be kind of repetitive, 11 but I just want to make sure that the record is 12 consistent. So there's some things that we talk about 13 at the beginning of every deposition. 14 First, I'm sure I know the answer to this, 15 but have you ever been deposed before? 16 A. I have. 17 Q. When was your most recent deposition? 18 A. A month, maybe, a little more than a month 19 ago. 20 Q. So even though it's relatively fresh, I am 21 going to go over some ground rules for the deposition 22 and just make sure that we have the same 23 understanding. 24 First is, of course, I'm going to ask 25 questions. And it's critically important that we</p>	<p style="text-align: right; margin-bottom: 0;">Page 5</p> <p>1 don't talk over each other, so I will stop talking if 2 you talk, and also I'd appreciate it if you'd wait to 3 start talking until I'm done talking. 4 Can we agree on that? 5 A. Yes. 6 Q. The second rule is even in real life we say 7 uh-huh or uh-uh. It makes for an unclear transcript, 8 and it makes the court reporter's work harder. So if 9 you say uh-huh or uh-uh in response to a question, I 10 may ask you was that a yes, was that a no. 11 Do you understand if I do that I'm not 12 trying to suggest an answer, I'm just trying to make 13 sure the record is clear? 14 A. Yes. 15 Q. Next, I'd like to proceed that if you answer 16 a question, it would be fair for me and anybody else 17 that reads the transcript to proceed with the 18 understanding that you both heard the question and 19 understood it; is that fair? 20 A. Yes, fair. 21 Q. And also on the same side, if you don't hear 22 a question or you don't understand the question, 23 please ask me to reask the question. I'd be happy to 24 do so; okay? 25 A. Yes.</p>															

Page 6

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.

Page 8

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**

Page 7

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

Page 9

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**

Page 10

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

Page 12

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

Page 11

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.

Page 13

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

NAME: NANOS Christopher G Entered Service: 02-02-76  
 (Last) (First) (MI)

	DATE	CASE NO.	ALLEGATIONS	DISPOSITION
1.	04-26-77	IA 77-105	Viol. Dept. Orders (Use of Siren on PD Vehicle)	Written Reprimand
2.	05-13-77	CA 77-08	Civil Suit Against City-Auto Accident	Investigation Only
3.	04-04-78	IA 78-82	Abusive Language	Not Sustained
4.	12/8/78	IA 78-348	Off Duty Conduct - Threats	Written Reprimand
5.	3/8/79	CP 79-50	Tardy	LWOP (one day)
6.	7/3/79	CP 79-144	Shot Fired	Suspended 1 day
7.	7/5/79	IA 79-104	Brutality	Not Sustained
8.	7/9/79	CP 79-148	Off Duty Conduct (Gambing)	Suspended 1 day
9.	10/2/79	CP 79-212	Shots Fired (SRT #79-9-2)	Shooting Justified
10.	11/8/79	CP 79-205	Failure to Report for Duty	1 day LWOP
11.	2/27/80	CP 80-64	Information Only	Information Only

El Paso Police Department  
 Internal Affairs Division  
 HISTORY CARD

MAR 20 25 PM '84 44 PC CLK OF 8D  
 WWW

	DATE	CASE NO.	ALLEGATIONS	DISPOSITION
12.	5/27/80	IA 80-70	VIOLATION OF Rules and Regulations	Suspended 10 Days
13.	6-27-80	IA 80-117	Unnecessary Force, Discourtesy	Not Sustained
14.	9-27-80	CP 80-298	TARDINESS	One Day L.W.O.P.
15.	2/19/81	CP 81-64	Dereliction of Duty	Written Reprimand
16.	3/25/81	CP 81-103	VIOLATION OF Rules and Regulations	INFORMATION ONLY
17.	3/27/81	CP 81-100	Viol. Of R & R (Unnecessary Force)	1 day suspension
18.	3/27/81	CP 81-101	VIOLATION OF R & R (Unnecessary Force)	3 day suspension
19.	11-24-81	CP 81-4111W	Off Duty Incident	INFORMATION ONLY
20.	12-18-81	IA 81-96	Excessive Force	NOT SUSTAINED
21.	2/17/82	CP 82-60	HABITUAL TARDINESS	1 day suspension
22.	3/22/82	CP 82-107	Excessive Force	15 DAY SUSPENSION
23.	4/15/82	CP 82-141	VIOLATION OF RULES AND REGULATIONS	COUNSELLING
24.	6/4/82	CP 82-197	HABITUAL TARDINESS	TWO DAY SUSPENSION

Card 2

NAME: NANOS CHRISTOPHER G. Entered Service: 02-02-76  
(Last) (First) (MI)

	DATE	CASE NO.	ALLEGATIONS	DISPOSITION
1.	7/21/82	CP 82-270	Insubordination	resignation in lieu of termination 8/3/82
2.	7/21/82	CP 82-271	Consistent Inefficiency	resignation in lieu of termination 8/3/82
3.				
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El Paso Police Department  
Internal Affairs Division

HISTORY CARD

MAR 20 25 PM '04 44 PC CLK OF BD  
NW