STATE OF NEVADA
PUBLIC RECORDS TASK FORCE

# GOVERNMENT MEMBERS'

# APPENDIX B-4

## Examples Provided by Nevada Government Entities of Public Records Requests Deemed Overboard or Unduly Burdensome

R. Clay Hendrix
[redacted]

Date: August 22, 2025

Churchill County Manager's Office
155 North Taylor Street, Suite 153
Fallon, NV 89406

RE: Public Records Request – August 19, 2025, Email from Joseph Sanford to R. Clay Hendrix, P.C., June 30, 2025, Letter, Bates-Labeled Documents, and Production Records

To Whom It May Concern:

Pursuant to the Nevada Public Records Act, NRS Chapter 239, I respectfully request access to and copies of all records, documents, and electronically stored information in the custody or control of Churchill County that relate to or arise from the August 19, 2025 email from Deputy District Attorney Joseph Sanford to R. Clay Hendrix, P.C., including but not limited to:

1. The June 30, 2025, letter referenced therein;
2. Any and all Bates-stamped documents attached or appended to that letter;
3. All associated transmittal records, cover emails, and correspondence.

This request specifically includes, but is not limited to:

- All metadata for each responsive document (including creation date, modification date, authorship, custodian, storage location, and transmission logs);
- Metadata relating to Bates numbering, including when the documents were Bates labeled, who applied the labeling, and through what system or process;
- Metadata and document properties for the June 30, 2025 letter, including draft dates, revisions, and authorship history;
- Server transmission records, including any return receipts, delivery confirmations, bounce-backs, rejection notices, or failure-to-send notifications related to the August 19, 2025 email or the June 30, 2025 letter;
- Any and all documents or electronic files indicating when responsive records were actually received by Churchill County for production pursuant to this or any related public records request;
- Any and all records, whether electronic or physical, that establish or prove that the June 30, 2025 letter was transmitted to R. Clay Hendrix on or about that date, with the associated Bates-stamped documents attached;
- Any and all electronic tracking data, metadata, transfer forms, and notices of receipt for every Bates-labeled document produced in this public records request exchange, from the beginning of the exchange to the present date;
- All metadata and production/transfer information for the Bates-stamped documents in the range Bates 0001 through Bates 0843;
- All metadata, tracking information, and production/transfer records for the Segura DUI file documents.

If any records are withheld in full or in part, please provide a written explanation identifying the legal basis for such withholding, as required by NRS 239.0107(1)(d). If redactions are necessary, I request that the remainder of each record be produced.

I respectfully request a response within five business days, as required by NRS 239.0107(1).

Please contact me at the information above if you have any questions or require clarification.

Sincerely,

[redacted]

R. Clay Hendrix

R. Clay Hendrix
[redacted]
July 02, 2025

Churchill County Office
155 N. Taylor Street, Suite 153
Fallon, NV 89406

**RE: Churchill County Public Records - Text Messages Between County Officials**
To the Custodian of Records:

Pursuant to the Nevada Public Records Act (NRS Chapter 239), I respectfully request the inspection and/or production of the following public records:
All text messages, including SMS, iMessages, or encrypted messaging platform messages (e.g., WhatsApp, Signal, Microsoft Teams Chat, or similar), whether sent from personal or government-issued devices, exchanged between or among any of the following individuals for the past 3 years:

County Manager James Barbee
Assistant County Manager Christian Spross
Jesse Segura
Kim Brontsema

This request includes any messages related to any County business sent on personal devices where the content relates to official duties or public matters, consistent with Comstock Residents Ass'n v. Lyon County Board of Commissioners, 134 Nev. 142 (Nev. Ct. App. 2018), and the Nevada Public Records Act Manual (2024 ed.), §2.02.

Please ensure that responsive records from mobile phones or other devices used for county business—whether county-owned or personal—are searched in good faith, and that appropriate steps are taken to preserve metadata and integrity of the original records. If responsive records are withheld or redacted, please identify the specific exemption or privilege claimed under NRS 239.0107 and provide a privilege log as required.
Please respond to this request within the time prescribed by NRS 239.0107(1), and if records are available electronically, I request they be provided in electronic format via email or secure link.

Res_ectfull_
[redacted]
R. Clay Hendrix
[redacted]

# Public Records Act Request Form (02/2021)

**1. INFORMATION ABOUT REQUEST**

**Date of Request: (Format = mm/dd/yyyy):** ***Note: It will not accept a date prior to TODAY.***

07/08/2026

**2. REQUESTER INFORMATION**

**First Name**

Kenneth

**Last Name**

Anshewitz

**Title**

**Company Name**

Utilyze, Inc.

**Street Address**

[redacted]

**Apt/Suite/Office**

**City**

[redacted]

**State**

[redacted]

**Zip**

[redacted]

**Phone Number 1 (Enter phone numbers in format = 999-999-9999)**

[redacted]

**Alternate Phone Number 2**

**Fax Number**

**3. Please enter your email address:**

[redacted]

**4. Please verify your email address:**

[redacted]

**5. PUBLIC RECORDS REQUESTED:**

**Select a Department first to View/Choose the type of record(s) to be requested. You may request one or more records but only from ONE Department at a time.**

Utilities

**7. DATE RANGE OF REQUEST:**

**Format = mm/dd/yyyy**

**From Date:**

01/01/2020

**To Date:**

01/01/2025

**8. More Information about your request:**
**(Please specify in detail the type of records requested, providing as much detail and information as possible. This assists staff in finding necessary records and reducing the amount of fees incurred when queries are very vague.):**

Hello,

I am submitting a public records request under Nevada public records law for de-identified, structured utility and public works datasets maintained by the City of North Las Vegas.

Based on the City's utility functions, this request is focused on water, wastewater, work orders, service requests, GIS/infrastructure records, and related public works records. I am not requesting personally identifiable information, customer names, exact residential addresses, payment records, or billing records tied to individuals.

Please provide responsive records in machine-readable format where available, such as CSV, Excel, shapefile, GeoJSON, geopackage, database export, or similar structured files. PDFs, screenshots, or summary reports are only requested if structured exports are unavailable.

1. Water Meter / Usage Data

For the largest feasible representative sample of water meters or accounts, please provide:

* Anonymized meter or account ID
* Timestamped water consumption
* Interval resolution, such as 5-minute, 15-minute, hourly, daily, or monthly
* Meter type, such as AMI, AMR, or legacy, if available
* Customer class, such as residential, multifamily, commercial, industrial, or municipal
* Service area, pressure zone, billing cycle, or other non-identifying geography
* At least 12 months of data if available

2. Leak, Burst, Continuous Flow, and Water Waste Events

For the same or overlapping anonymized dataset, please provide any available records related to:

* Leak flags or alerts
* Burst pipe events
* Continuous flow alerts
* High-usage anomaly flags
* Water waste reports
* Irrigation-related alerts or classifications
* Event start timestamp
* Event end or resolution timestamp
* Detection source, such as system alert, customer report, field inspection, 311/service request, or work order

If formal event labels are not maintained, please provide proxy records such as customer-reported leak incidents, water waste reports, leak-related work orders, field technician notes, service line break records, main break records, and continuous usage alerts.

3. Water and Wastewater Work Orders

Please provide structured work order records related to water, sewer, wastewater collection, wastewater treatment, water waste, service line repairs, main breaks, sewer backups, and related utility operations, including:

* Anonymized work order ID
* Associated anonymized meter/account ID if available
* Work order category
* Open timestamp
* Close timestamp
* Status
* Resolution category
* Non-sensitive notes or coded notes if available
* Department or crew category
* Privacy-preserving location, such as block, nearest cross streets, pressure zone, service area, census tract, grid cell, or rounded coordinates

4. Wastewater / Sewer / Collection System Records

Please provide structured wastewater and sewer records where available, including:

* Sewer backup reports
* Sewer overflow records
* Collection system blockage records
* Manhole overflow records
* Lift station alarms or incident records
* Wastewater work orders
* Industrial wastewater pretreatment inspection records, where releasable
* Event timestamp
* Resolution timestamp
* Cause category
* Privacy-preserving location
* Asset type involved

5. GIS and Infrastructure Data

Please provide GIS layers or structured infrastructure records for releasable utility and public works assets, including:

* Water service area boundaries
* Wastewater service area boundaries
* Water mains
* Sewer mains
* Main sizes
* Pipe material
* Pipe installation year or age, if available
* Pressure zones
* Valves, hydrants, pumps, lift stations, reservoirs, and treatment facilities, if releasable
* Maintenance districts
* Capital improvement project layers
* Public works asset layers
* Road centerlines
* Parcels or public facility layers, if already maintained for public release
* Data dictionaries, metadata, and coordinate reference system information

If exact infrastructure layers are restricted for security reasons, please provide generalized, aggregated, redacted, or zone-level alternatives.

6. 311 / Service Request / Customer Request Data

Please provide structured city service request or customer request records related to:

* Water leaks
* Water waste
* Sewer backups
* Stormwater flooding
* Utility cuts
* Pavement cuts
* Sinkholes
* Streetlight outages
* Downed wire reports received by the City, if any
* Infrastructure damage
* Utility-related complaints
* Public works maintenance requests

Requested fields include:

* Request ID
* Category
* Subcategory
* Open timestamp
* Close timestamp
* Status
* Department assigned
* Resolution category

* Work order linkage if available
* Privacy-preserving location

7. City Fleet / EV Charging / Facility Energy Records

If maintained by the City, please provide structured records related to City-owned fleet electrification, EV chargers, and facility infrastructure, including:

* City fleet inventory by vehicle type, fuel type, department, age, and replacement schedule
* Existing City-owned EV charger locations
* Charger type, power level, port count, installation date, and utilization if available
* Planned charging sites
* Facility upgrade plans related to fleet electrification
* Publicly releasable sustainability, energy, or fleet electrification planning records

8. Data Structure Requirements

Please include:

* Data dictionary or schema documentation
* Field descriptions
* Units of measurement
* Time zone used for timestamps
* Coordinate reference system for GIS data
* Consistent anonymized IDs across tables where possible
* The largest feasible date range, preferably 3 to 5 years for events, work orders, service requests, and infrastructure incident records

Privacy and Redaction

This request does not seek names, exact residential addresses, personally identifiable information, payment records, or billing records tied to individuals.

If exact addresses cannot be shared, I am comfortable with block-level locations, nearest cross streets, rounded coordinates, census tract, service area, pressure zone, grid cell, or other privacy-preserving geography.

If account-level records cannot be shared, I am comfortable with aggregated, anonymized, sampled, binned, or zone-level data.

If notes fields cannot be shared, please provide coded categories, resolution codes, or redacted summaries.

If any portion of this request cannot be fulfilled, please provide the closest available alternative, including existing exports, public datasets, data dictionaries, schemas, reports, dashboards, aggregated monthly counts, GIS layers, or the correct department contact for the records.

Thank you for your time and consideration. I am happy to clarify or narrow the request if needed to facilitate fulfillment.

Best regards,

Kenneth Anshewitz

**9. FORMAT OF REQUESTED RECORDS:**
***Please note: Payment upon receipt of records or a deposit in advance of receipt of records may be required.***
**Select one format.**

Other Format (Specify) (May require payment of fees)::

**10. How do you intend to submit your PRA request?**

Will submit online

Michael Fetter
[redacted]

NLVPD RECORDS
AUG 3 2026 16:12

July 27, 2026

Records & Information Management
Clark County Nevada
Regional Justice Center
200 Lewis Avenue
Las Vegas, Nevada 89155

AND

City of North Las Vegas Records Department
2200 Las Vegas Boulevard North
North Las Vegas, Nevada 89030

To Whom It May Concern:

RE: Public Records Request Pursuant to Nevada Revised Statutes § 239.010

I am submitting this formal request for public records pursuant to the Nevada Public Records Act, N.R.S. § 239.010, et seq. I request the following documents relating to Code Enforcement operations for the period of the past five (5) years, or such longer period as may be available:

1. All complaint logs and complaint records filed against Code Enforcement Officers, including the date filed, nature of complaint, complainant information, and resolution or disposition;
2. All incident reports created by, filed against, or involving Code Enforcement Officers, including but not limited to reports of alleged misconduct, improper enforcement, or violations of established procedures;
3. All disciplinary records, warning letters, reprimands, suspensions, terminations, or other disciplinary actions taken against Code Enforcement Officers;
4. All training records, certifications, and continuing education documentation for Code Enforcement Officers, including attendance records and subject matter of training;

5. All communications (email, memoranda, text messages, and written correspondence) between Code Enforcement Officers and between Code Enforcement Officers and supervisory personnel related to enforcement activities, procedures, or allegations of misconduct;

6. All policies, procedures, and protocols governing Code Enforcement operations, officer conduct, and complaint procedures;

7. All performance evaluations for Code Enforcement Officers.

As these records are public records under Nevada law, I request that they be provided in their entirety. To the extent that any documents contain information that may be exempt from disclosure under N.R.S. § 239.010, I request that you provide redacted copies with specific explanation of the exemption claimed for each redacted portion.

I request that these records be provided within ten (10) business days, as required by Nevada law. If you anticipate that compliance will require additional time, please notify me in writing of the specific reasons for the delay and provide an estimated date of completion.

Please provide the requested records in electronic format (PDF) if available, or in paper format if electronic copies are not available. If there are costs associated with copying or producing these records, please advise me of the estimated cost before proceeding.

You may contact me at the address, email address, or phone number listed above. I look forward to your prompt response.

Respectfully,

[redacted]

Michael Fetter

# Public Records Act Request Form (02/2021)

**1. INFORMATION ABOUT REQUEST**

**Date of Request: (Format = mm/dd/yyyy):** ***Note: It will not accept a date prior to TODAY.***

09/21/2026

**2. REQUESTER INFORMATION**

**First Name**

Calvin

**Last Name**

Thrall

**Title**

**Company Name**

**Street Address**

[redacted]

**Apt/Suite/Office**

[redacted]

**City**

[redacted]

**State**

[redacted]

**Zip**

[redacted]

**Phone Number 1 (Enter phone numbers in format = 999-999-9999)**

**Alternate Phone Number 2**

**Fax Number**

**3. Please enter your email address:**

[redacted]

**4. Please verify your email address:**

[redacted]

**5. PUBLIC RECORDS REQUESTED:**

**Select a Department first to View/Choose the type of record(s) to be requested. You may request one or more records but only from ONE Department at a time.**

Other (Please provide as many details as possible in the next field.)

**6. For OTHER REQUESTS that were not listed above:**
**(Please specify in detail the type of records requested, providing as much detail and information as possible. This assists staff in finding necessary records and reducing the amount of fees incurred when queries are very vague.):**

I would like to request all available records on private meetings that have occurred between city officials - including mayors and vice mayors, city councillors, and any other administrative officers including planning/zoning officials - and external individuals or organizations including for-profit firms, nonprofit organizations, and natural persons. For each meeting, I are interested in the following information/metadata:

1. The date on which the meeting occurred;
2. The name of the external individual/organization involved in the meeting;
3. If the meeting was conducted by a lobbyist on behalf of another organization, the names of both the lobbyist and the client they were representing;
4. The government office(s) involved in the meeting, including officials' names if available;
5. The general topic of the meeting;
6. Any other available information on the external individual/organization's motivation for holding the meeting (e.g. expediting a permit application, commenting on a proposed ordinance, etc).

Even if one or more pieces of metadata is not available for a given meeting, I would still like to receive whatever information does exist about it. I would like to request this information for the entire time span in which it is available or can be feasibly assembled. I would prefer to receive this information in tabular format, ideally in a .csv or .xlsx file, in which each meeting is one row and each piece of metadata is one column. However, if the information is only available in .pdf or similar format, I would also accept this as responsive to my request.

If it is likely that fulfilling this request will require the payment of a fee, I would like to be provided an estimate of this fee for confirmation before any work has been completed.

**7. DATE RANGE OF REQUEST:**
**Format = mm/dd/yyyy**

**From Date:**

01/01/1990

**To Date:**

09/21/2026

**8. FORMAT OF REQUESTED RECORDS:**

***Please note: Payment upon receipt of records or a deposit in advance of receipt of records may be required.***
**Select one format.**

PDF copies

**9. How do you intend to submit your PRA request?**

Will submit online

# Open Records Request (#W093996-111425)

## Open Records Request Details

| | |
|---|---|
| Type of Records Requested: | Other |

| | |
|---|---|
| Describe the record(s) you are requesting: | Please provide any and all City of Las Vegas records, including emails, internal messages, forwarded correspondence, routing slips, calendar entries, notes, summaries, complaint logs, phone notes, call-center tickets, or internal memoranda, that were sent to, received by, copied to, forwarded to, or otherwise viewed by ANY City employee, department, or contractor in relation to:<br><br>A. My correspondence<br><br>Any correspondence originating from me under the following names/emails/phone numbers:<br><br>Nathan Edouard<br><br>Dr. Nathan Edouard<br><br>SRXV INC / LVSCRIPTS / LVS<br><br>[redacted]<br><br>[redacted]<br><br>[redacted]<br><br>[redacted]<br><br>B. Topics covered by my correspondence<br><br>Include all communications involving:<br><br>Toys for Tickets program<br><br>failure to credit donated toys<br><br>citations, late fees, or collections escalation<br><br>ADA written communication requests<br><br>safety complaints at 901 Fremont St<br><br>electrical hazards / gas leaks / water intrusion<br><br>attempted break-ins / shootings near property<br><br>Whistleblower activity<br><br>Code Enforcement complaints<br><br>retaliation concerns<br><br>misrouted notices or address corrections<br><br>any complaint made by me to ANY City office<br><br>C. All parties who received, viewed, or forwarded my complaints<br><br>Search all records from any employee who was:<br><br>a direct recipient<br><br>cc'd<br><br>bcc'd<br><br>forwarded the email<br><br>forwarded TO another department<br><br>consulted internally<br><br>mentioned in internal routing |

assigned through internal ticketing

MANDATORY SEARCHED DEPARTMENTS (list explicitly so they cannot omit):

Mayor's Office

Mayor Pro Tem / Deputy

City Council Offices

City Manager's Office

Parking Enforcement

Municipal Court / Collections

Code Enforcement

Building & Safety

Fire & Rescue

Department of Public Safety

City Attorney – Civil

City Attorney – Criminal

Human Resources

Risk Management

Real Estate Services

Development Services

Any third-party contractors handling citations, tickets, or safety complaints

Date Range: January 1, 2024 – Present.

All responses, notices, and communications must be sent to:

[redacted]

My portal email cannot be updated at this time — please treat this as my formal directive for NPRA communications.

🔒 Legal Basis

This request is submitted under the Nevada Public Records Act (NPRA), with ADA Title II communication accommodations, and whistleblower-retaliation protections.

| | | |
|---|---|---|
| Confidential: | No | Check this box if the request contains confidential information. |
| Certified Copies: | No | ($2 surcharge per certification) |
| Preferred Method to Receive Records: | Electronic via Records Center | |

## Internal Use Only

## Response Letter/Email for Forwarding a Request

## Response Letter/Email for Requesting Clarification

## Response Letter/Email for Delay

# Open Records Request (#W098131-030226)

## Open Records Request Details

| | | |
|---|---|---|
| Type of Records Requested: | Other | |
| Describe the record(s) you are requesting: | Pursuant to the Nevada Public Records Act, NRS 239.010 et seq., I hereby request copies of the following public records:<br>All emails, correspondence, and written communications sent or received by any employee, official, or representative of the Office of the Mayor and the Las Vegas Department of Public Safety between October 1, 2025 and February 1, 2026, that contain any of the following terms:<br>Flock Safety, Flock Group, Flock cameras, Flock system, Flock contract, license plate reader, LPR, ALPR, automated license plate recognition, vehicle surveillance, fixed surveillance cameras, public safety camera network, camera installation, surveillance infrastructure, or camera deployment.<br>This request is not limited to communications between the Office of the Mayor and the Department of Public Safety. I am requesting all responsive communications regardless of the recipient or sender, including but not limited to communications with Flock Safety or Flock Group representatives, vendors, contractors, consultants, other city departments, county agencies, law enforcement agencies, elected officials, legal counsel, lobbyists, third-party technology providers, and any private individuals or organizations.<br>I am specifically seeking records related to:<br><br>Any discussions, negotiations, or approvals regarding the acquisition, installation, or expansion of Flock Safety surveillance camera systems within the City of Las Vegas<br>Any contracts, proposals, bids, or invoices from Flock Safety or Flock Group<br>Any communications with Flock Safety or Flock Group company representatives<br>Any internal discussions regarding the use, operation, or data retention policies of the camera systems<br>Any communications with LVMPD, other law enforcement agencies, or third parties regarding the Flock camera network<br>Any discussions of privacy concerns, legal review, or public oversight related to the cameras<br>Any communications regarding funding sources, budget approvals, or grant funding related to camera acquisition or installation<br><br>Fee Waiver Request<br>I request a full waiver of all fees associated with this request. Disclosure of these records serves the public interest, as I am an investigative journalist researching the use of surveillance technology by local government. The information will be used to inform the public and will not be used for commercial purposes. Pursuant to NRS 239.052, fee waivers are appropriate when disclosure primarily benefits the general public.<br>Format<br>Please provide all responsive records in electronic format (PDF or native email format) via email. If any records are withheld in whole or in part, please provide a written explanation citing the specific statutory exemption and a privilege log identifying each withheld document.<br>I request a response within five business days pursuant to NRS 239.0107. If any delay is anticipated, please notify me immediately with an explanation and estimated completion date.<br>Thank you for your attention to this matter. | |
| Confidential: | No | Check this box if the request contains confidential information. |
| Certified Copies: | No | ($2 surcharge per certification) |
| Preferred Method to Receive Records: | Electronic via Records Center | |

## Internal Use Only

## Response Letter/Email for Forwarding a Request

## Response Letter/Email for Requesting Clarification

## Response Letter/Email for Delay

## Response Letter/Email for Denial

# Open Records Request (#W098340-030526)

## Open Records Request Details

| | |
|---|---|
| Type of Records Requested: | Correspondence |
| Describe the record(s) you are requesting: | Correspondence Requests:<br>All “Correspondence” from or to Jorge Cervantes regarding the Royal Links Golf Club, SGGOAKS Royal Links, LLC, Shelby Futch, Gordon Petrie or James Gomes for the years 2018 through 2024.<br><br>All Correspondence from or to Scott Adams regarding the Royal Links Golf Club, SGGOAKS Royal Links, LLC, Shelby Futch, Gordon Petrie or James Gomes for the years 2005 through 2019.<br><br>All Correspondence from or to Mike Janssen regarding the Royal Links Golf Club, SGGOAKS Royal Links, LLC, Shelby Futch, Gordon Petrie or James Gomes. for the years 2018 through 2025.<br><br>All “Correspondence” from or to employees of the City of Las Vegas regarding the Royal Links Golf Club, SGGOAKS Royal Links, LLC, Shelby Futch, Gordon Petrie or James Gomes for the years 2018 through 2025.<br><br>All “Correspondence” from or to Mike Janssen regarding the Royal Links Golf Club, SGGOAKS Royal Links, LLC, Shelby Futch, Gordon Petrie, James Gomes, or any other person or entity associated with the property and/or the buffer zones located at 5995 East Vegas Drive or Clark County Assessor’s Parcel Number 161-10-202-001 for the years 2018 through 2025.<br><br>All “Correspondence” from or to employees of the City of Las Vegas any other person or entity associated with the property located at 5995 East Vegas Drive or Clark County Assessor’s Parcel Number 161-10-202-001 for the years 2018 through 2025.<br><br>“Correspondence” shall mean any written or electronic communication (including but not limited to, letters, emails, memos, texts, internal communication systems or other communication methods utilized by the City of Las Vegas employees).<br><br>City Council Document Requests:<br>All documents and Correspondences in connection with the January 25, 1999 City of Las Vegas City Council meeting in regard to the sale of real property located at 5995 East Vegas Drive or Clark County Assessor’s Parcel Number 161-10-202-001 to The Walters Group, including but not limited to, the agenda, agenda documentation (including all summaries provided by City personnel and consultants), minutes, and transcripts.<br><br>All documents and Correspondences in connection with the subsequent cancellation of the sale of real property located at 5995 East Vegas Drive or Clark County Assessor’s Parcel Number 161-10-202-001 to The Walters Group, including but not limited to, the agenda, agenda documentation (including all summaries provided by City personnel and consultants), minutes, and transcripts of any City Council meeting for the years of 2005 through 2009.<br><br>All documents and Correspondences in connection with the March 20, 2019 City of Las Vegas City Council meeting in regard to the real property located at 5995 East Vegas Drive or Clark County Assessor’s Parcel Number 161-10-202-001, including but not limited to, the agenda, agenda documentation (including all summaries provided by City personnel and consultants), minutes, and transcripts.<br><br>All documents and Correspondences in connection with the December 18, 2021 City of Las Vegas City Council meeting in regard to the real property located at 5995 East Vegas Drive or Clark County Assessor’s Parcel Number 161-10-202-001, including but not limited to, the agenda, minutes, and transcripts.<br><br>Reports:<br>All reports, summaries, analysis or investigations in connection with the real property located at 5995 East Vegas Drive or Clark County Assessor’s Parcel Number 161-10-202-001 regarding the sale of such property to the Walter Group, the termination of the sale to the Walters Group or the removal/modification of the deed restriction with SGGOaks Royal Links, LLC. |
| Confidential: | No Check this box if the request contains confidential information. |
| Certified Copies: | No ($2 surcharge per certification) |
| Preferred Method to Receive Records: | Electronic via Records Center |

**From:** Lisa Logsdon
**To:** AGGeneralCounsel
**Subject:** Examples of Overbroad or Unduly Burdensome
**Date:** Wednesday, October 7, 2026 6:45:12 PM
**Attachments:** image001.png
Fee Schedule rev 07-01-24.docx

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**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Attached is the Assessor's fee schedule. I will try and gather other Department's fee schedules, but most County departments do not charge unless statutorily authorized, for example Elections 293.440 allows the County to charge one cent per name for copies of voter registration rolls.

Examples of overbroad request:

I would like to request all correspondence and electronic data including but not limited to external correspondence between all Juvenile Justice Service employees and contractors and any emails their sent from their Clark County issued email address to an email domain ending in @msn.com, @hotmail.com, @yahoo.com, @gmail.com, @outlook.com, @aol.com, @att.net, @comcast.net, @verizon.net, @icloud.com while they were employed by Clark County from 08/08/2017 to 01/01/2026. This request for public records is intended to include all incoming and outgoing writings, letters, stored data and photos sent from his Clark County email address to any of email domains noted above. The requester refused to narrow the request.

All emails with or about Jennifer Erbes from the entire month of April 2026 and May 1 to 8 2026. All emails with or about Denise Parker from the entire month of April 2026 and May 1 to 8 2026. While this request is short in time frame and we were able to get the requester to narrow it to one County department. That department has over a 1,000 employees so there is substantial communication.

Pursuant to the Nevada Public Records Act (NRS Chapter 239), I am writing to request an inspection and copies of the following public records maintained by Clark County, the Board of County Commissioners, and/or the Moapa Valley Fire District. Please provide existing records, including electronic communications, emails, text messages, calendars, and performance documents, corresponding to the specific items detailed below. 1. Electronic Communications (Emails) Item 1A: All emails sent, received, or copied between Joseph Davis (Moapa Valley Fire District Advisory Board Member) and Commissioner Marilyn Kirkpatrick from August 1, 2024, to the date of this request. Item 1B: All emails sent, received, or copied by Jessica Colvin, Anna Danchik, John Steinbeck, Billy Samuels, Kevin Lunkwitz, Les Lee Shell, Kevin Scheller, Judy Metz, Tim Baldwin, and

Lisa Logsdon containing the search terms ?"Moapa Valley Fire"?, ?"Moapa Valley Fire District"?, ?"MVFD"?, “Moapa Valley Fire Protection District” “Inter-local” “Neel” or ?"Stephen Neel"? from August 1, 2024, to the date of this request. Item 1C: All emails sent, received, or copied from Stephen Neel to Jessica Colvin spanning the four-year period from June 1, 2022, to the date of this request. Item 1D: All emails generated by, sent to, or copied by the Clark County Human Resources Department or the Office of Diversity containing the name or pertaining to the employment of Stephen Neel from August 1, 2024, to the date of this request. 2. Mobile Communications (Text Messages) This request explicitly covers official business communications conducted on both county-issued and personal mobile devices pursuant to Nevada public records law standards regarding public business. 2A: All text messages between Commissioner Marilyn Kirkpatrick and Joseph (Joe) Davis pertaining to official county or district business from August 1, 2024, to the date of this request. 2B: All text messages between Les Lee Shell and Billy Samuels containing the terms ?"Moapa Valley Fire"?, ?"MVFD"?, ?"Stephen Neel"?, “Neel” or “Chief” from August 1, 2024, to the date of this request. 2C: All text messages between Commissioner Marilyn Kirkpatrick and Billy Samuels containing the terms ?"Moapa Valley Fire"?, ?"MVFD"?, “Neel” “Chief”, or ?"Stephen Neel"? from August 1, 2024, to the date of this request. 2D: 2C: All text messages between Commissioner Marilyn Kirkpatrick and John Steinbeck containing the terms ?"Moapa Valley Fire"?, ?"MVFD"?, “Neel” “Chief”, or ?"Stephen Neel"? from August 1, 2024, to the date of this request. 3. Meeting Logs, Calendars & Attendance Records 3A: All calendar entries, meeting dates, times, and listed attendees/participants regarding or discussing the Moapa Valley Fire District or Stephen Neel from August 1, 2024, to the date of this request. This query applies to the specific schedules and calendars maintained by: Commissioner Marilyn Kirkpatrick Jessica Colvin Les Lee Shell Billy Samuels Tim Baldwin Lisa Logsdon John Steinbeck 4. Personnel & Evaluation Records 4A: The annual performance evaluation performed, authored, or submitted by Joseph Davis regarding Stephen Neel for the past 5 years. 4. Personnel, Internal Movements, and Separation Records 4A: The annual performance evaluation performed, authored, or submitted by Joseph Davis regarding Stephen Neel for the most recent evaluation period. 4B: All personnel transfer logs, internal assignment records, or documentation detailing the reassignment or movement of Chris Due out of the Office of the Board of County Commissioners (specifically Commissioner Kirkpatrick’s office), including any recorded "cause for movement" or documented administrative reasons for the transition to include emails to his supervisor reporting wrong doing. 4C: All final exit interview records, resignation letters, or documentation detailing the separation of employment and stated "cause for leaving" for former Executive Assistant Gina Slaughter and former staff member/party planner Vanessa (last name unknown, formerly assigned to the Office of Commissioner Kirkpatrick). 5. HR and Office of Diversity Complaints 5A: Any

and all formal or informal complaints, intake forms, or investigative files submitted to or maintained by Clark County Human Resources or the Office of Diversity filed by Chris Due. 5B: Any and all formal or informal complaints, grievance filings, or Office of Diversity reports in which Commissioner Marilyn Kirkpatrick is specifically named as the respondent, accused party, or subject of the complaint. Statutory Response and Fee Guidelines Pursuant to NRS 239.0107, a public book or record must be made available within five (5) business days of receiving this request. If the record cannot be produced within this timeframe, please provide a written explanation detailing the specific legal authority/statute rendering the record confidential, or provide a definitive date and time when the records will be made available for inspection. Per Clark County's established public records fee schedule, I request that all responsive files be provided in an electronic format (such as PDF, .eml, or Excel data sheets) via email or portal upload to avoid reproduction fees. If the county anticipates any extraordinary professional staff hours or costs to compile these records, please notify me of the estimated cost prior to fulfilling the request. If any portion of these documents is deemed legally exempt or confidential under Nevada law, please redact only the specific exempt portions (such as personal phone numbers or SSNs) and produce the remaining, non-exempt parts of the record. Thank you for your time and assistance in processing this request.


# Lisa Logsdon

County Counsel
Clark County District Attorney's Office – Civil Division
500 Grand Central Parkway, Suite 5075
Las Vegas, Nevada 89155
Telephone: 702.455.4761
Lisa.Logsdon@clarkcountydanv.gov



CONFIDENTIALITY NOTICE: This electronic message is intended to be viewed only by the individual or entity to whom it is addressed. It may contain information that is protected by the attorney client privilege, confidential, and exempt from disclosure under applicable law. Any dissemination, distribution, or copying of this communication is strictly prohibited without our prior permission. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, or if you have received this communication in error, please notify me immediately by return e-mail and delete the original message and any copies of it from your computer. Thank you.

**From:** Nathan K. Orme
**To:** AGGeneralCounsel
**Subject:** Public records survey - Department of Human Services
**Date:** Tuesday, October 6, 2026 9:26:34 AM
**Attachments:** image003.png

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Please see the information below:

1. Up to three (3) examples of public records requests your Government Entity deemed overbroad or unduly burdensome
    a. Request that tries to specify the technical parameters of the records, thereby requiring burdensome analysis and communication with requester to clarify: We are reaching out to submit an open records request to the Southern Nevada Adult Mental Health for general purchasing records from 1/1/2023 to the current request date of 11/20/2025. Please review the request below in its entirety. If your agency finds this request unduly burdensome under Nevada Public Record guidelines, please contact us. We are willing to reduce/modify this request, if necessary. Request details are as follows: Our request is limited to readily available, fully electronic documents. For the purpose of this request, “fully electronic” refers to dynamic PDF, Excel (csv., xlsx.), TXT or RTF files containing active text. Files containing active text should allow the user to use their mouse/trackpad to highlight, select, copy and paste the text from the file. If you would like report samples from your agency’s financial software, please provide us with the software name in your response. Responsive reports include those containing the following details per purchase: Unique Identifier (i.e. PO #, Invoice #, Check #, Encumbrance #, etc.) o Purchase Date o Line item details o Line item quantity o Line item price o Vendor ID number, name, address, contact person and their email address
    b. Request requiring clarification of specific staff emails to search and still requires extensive staff review because the search will cast a wide net and return many email files: I'm requesting all emails and any other correspondence sent to or from staff at DCFS between Jan. 1, 2019 and Aug. 10, 2022 in which there is any mention of Never Give Up Youth Healing Center in Amargosa Valley.
    c. Request that is a combination of records and questions, requiring extensive staff analysis to parse it out: I am requesting the following information for Southern Nevada Adult Mental Health Services (Rawson Neal and Stein), East Las Vegas Med Clinic, Henderson Med Clinic, Mesquite Behavioral Health Center, West Charleston Med Clinic, Laughlin Behavioral Health Center, Lake's Crossing Center, and Northern Nevada Adult Mental Health

Services (Dini-Townsend). Please provide a detailed list of expenditures for each of the last two years. Please provide additional information for any of the following that apply: Were any supplemental appropriations made available during the past two fiscal years? If so, what were the amounts for each of the past two fiscal years? Were any capital appropriations not included in the budget? If so, what were the amounts for each of the past two fiscal years?

Were state employee healthcare, retirement, or other benefits paid from a different budget source? If so, what were the amounts for each for the past two fiscal years? Were any goods or services provided and paid for by another agency or department sharing the campus, e.g. perimeter security? If so, please describe the services and the cost to provide those services for each of the past two fiscal years? Were any goods or services provided by the hospital to other entities on the campus not related to the hospital's mission, e.g. food or maintenance services? If so, please describe the services and the cost to provide those services for each of the past two fiscal years? Please provide the following information for each type of bed service provided, e.g. adult civil, adult forensic, developmental disability, children/adolescent, other: Annual cost per bed. Average daily census for last fiscal year. Average daily census for current fiscal year to date. Current census. Average length of stay. Total number of funded (operating) beds for the last fiscal year. Total number of funded (operating) beds for the current fiscal year to date. Please provide a list of FTEs by location to include the following: Job title, Number of positions, Salary range by position, Vacancy rate by position, Current vacancies by position. Please provide a list of any services the hospital contracts out costing more than $100,000 and the annual cost for each service. Please provide the following if services are provided to forensic patients: Average number of days to restore competency for those who were incompetent to stand trial, Average length of stay for patients who were found not guilty by reason of insanity. Please provide a basic floor plan or layout of the hospital. Please provide a list of the buildings currently being used on the campus to include: Name of the building, Year constructed, Date of most recent renovation if applicable, Square footage. Is there currently a waiting list for either forensic or civil beds in the state? If yes, please provide the following: Number of people currently on the waiting list (s), Date the use of a waiting list began, Number of people on the list six months ago, Number of people on the list 12 months ago.

2. Link to DHS Public Records Requests web page with fee schedule.

**Nathan Orme (he/him/his)**
Public Information Officer | Director's Office
Nevada Department of Human Services
1000 Division Street, Suite 201
Carson City, NV 89703
(775) 531-1073 – office/Teams
[redacted]
nkorme@dhs.nv.gov | www.dhs.nv.gov

Nevada Department of Human Services
Helping people. It's who we are and what we do.

NEVADA 988

**988** is a confidential, free hotline that connects those experiencing a mental health, substance use, or suicidal crisis with trained crisis counselors 24/7/365. **Call, text, or chat** nevada988.org

Need help with anything else? Nevada **211** can connect you with information and referrals to local health and human services agencies. It is free and confidential. **Call 211, text 898211, or visit** www.nevada211.org.

2·1·1 Nevada

Rachel Provstgaard
[redacted]

Date: August 15, 2026

Nevada Division of Indigent Defense Services (DIDS)
896 West Nye Lane
Carson City, Nevada 89703

**Re: Public Records Request — Ethics Acknowledgment and Contractor File for Kelley Blatnik, Esq.**

To the Records Custodian:

I am requesting confirmation of whether Kelley Blatnik, appointed defense counsel for Sheril Provstgaard in Nye County matters including Case No. 23CR00098 5K, has an ethics acknowledgment form on file under NRS 281A.500, in the same manner your office (or the Nevada Commission on Ethics) previously confirmed for Judge Robert W. Lane.

I am also requesting any contractor or appointment file maintained by DIDS for Ms. Blatnik reflecting her status, compensation arrangement, and scope of appointment as counsel in Nye County, to the extent such records are subject to disclosure under Nevada law.

This request is made pursuant to the Nevada Public Records Act, NRS Chapter 239. Please provide copies of the requested records in the format most convenient for your office (electronic copy by email is preferred, if available). If any portion of this request is denied, please state the specific legal basis for the denial in writing, as required by NRS 239.0107.

Thank you for your attention to this request.

Sincerely,

/s/ Rachel Provstgaard
Rachel Provstgaard

Rachel Provstgaard
[redacted]

Date: August 15, 2026

Nevada Division of Indigent Defense Services (DIDS)
896 West Nye Lane
Carson City, Nevada 89703

**Re: Public Records Request — Action Taken on Complaint Dated January 9, 2024, Regarding Attorney Kelley Blatnik**

To the Records Custodian:

I am requesting all records reflecting the receipt of, and any action taken in response to, a written complaint sent to didscontact@dids.nv.gov on January 9, 2024, by Sheril Willis Provstgaard, subject line 'Bad, threatening, unmeaningful public defender,' regarding appointed counsel Kelley Blatnik of Blatnik Law, LLC.

The complaint raised, among other things: (1) that Ms. Blatnik would not stop contacting Mr. Provstgaard after being asked to; (2) that Ms. Blatnik threatened to have him 'bound, gagged and medicated into competency'; (3) that Ms. Blatnik repeatedly misidentified Deputy Thomas Boni by an incorrect name despite handling the case for over a year; and (4) that the Nye County Sheriff's Office had been unresponsive to a related harassment complaint against Nye County employee Jim Basinger.

Please provide: (1) any acknowledgment of receipt sent to Mr. Provstgaard or on his behalf; (2) any internal log, intake record, or case file opened in response to this complaint; (3) any investigation, review, or inquiry conducted as a result, including any communications with Ms. Blatnik or Blatnik Law, LLC concerning the complaint; (4) any written response, determination, or disposition issued as to this complaint; and (5) any records reflecting whether this complaint was referred to any other agency, board, or office, and if so, to whom and when.

This request is separate from, and in addition to, a prior request submitted regarding Ms. Blatnik's ethics acknowledgment and contractor file on file with your office.

This request is made pursuant to the Nevada Public Records Act, NRS Chapter 239. Please provide copies of the requested records in the format most convenient for your office (electronic copy by

email is preferred, if available). If any portion of this request is denied, please state the specific legal basis for the denial in writing, as required by NRS 239.0107.

Thank you for your attention to this request.

Sincerely,

/s/ Rachel Provstgaard
Rachel Provstgaard

**From:** DEPARTMENT OF INDIGENT DEFENSE SERVICES
**To:** Homa Sayyar; Brenda Roberts; Peter P. Handy
**Cc:** DEPARTMENT OF INDIGENT DEFENSE SERVICES
**Subject:** Fw: Records Request
**Date:** Wednesday, July 29, 2026 3:15:10 PM
**Attachments:** Outlook-Title_A l.png

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See below for response from Ms. Hunter regarding the records request.

I will log the response as a complaint and save it to the client file.

**Jake Matthews**
Administrative Assistant
Nevada Department of Indigent Defense Services
751 Basque Way
Carson City, NV 89706
(775) 687-8490
j.matthews@dids.nv.gov

---

**From:** Brittany Hunter <brittany.hunter.415@gmail.com>
**Sent:** Wednesday, July 29, 2026 3:01 PM
**To:** DEPARTMENT OF INDIGENT DEFENSE SERVICES <didscontact@dids.nv.gov>
**Subject:** Re: Records Request

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

**Subject:** RE: Reference Case No. 1368242 - Proof of Complaint Disclosure and Urgent Clarification Request

Dear DIDS Administration,

Thank you for your response and for clarifying that the Department does not retain jurisdiction over civil NRS 432B family law panels. I understand your office is closing this matter.

However, I received text messages from my court-appointed dependency attorney, Trevor Hartzell in reference to this report. On Friday at 11:40 AM, Mr. Hartzell sent me a direct text message stating: *"You are filing reports and bringing more attention to your dishonesty. I am withdrawing as your attorney as soon as practicable."*

Because the only report I filed was the specific online grievance form through the DIDS portal, this text is unarguable physical proof that my complaint text was actively leaked or forwarded directly to him.

If DIDS did not send this packet, I urgently request that you look into your system transmission records to verify how this occurred. Did DIDS auto-forward this to a Washoe County panel administrator, or did an internal tracking notification alert him? This breach of confidentiality has resulted in severe professional retaliation and the immediate abandonment of my legal defense.

Thank you for your time and for helping me identify how this data was transmitted so I can report it to the proper court supervisors.

Sincerely,
Brittany Hunter

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On Wed, Jul 29, 2026 at 2:10 PM DEPARTMENT OF INDIGENT DEFENSE SERVICES <didscontact@dids.nv.gov> wrote:

> Hello,
>
> *We received a telephonic request for a copy of the complaint submitted by this e-mail address and are therefore releasing it back to this email address. As indicated at https://dids.nv.gov/Complaints/Complaints_or_Recommendations/ when you submitted your form:*
>
> 1. *Submissions will be used for internal purposes only.*
> 2. *If the submission does not contain a recommendation or complaint concerning indigent defense services, the matter will be closed.*
> 3. *DIDS strives for government transparency by adhering to the requirements of Nevada Public Records Law and the information received may be subject to disclosure pursuant to the Nevada Public Records Act. For more information,*

*please see NRS Chapter 239.*

4. *These submissions will not be forwarded to the State Bar of Nevada, nor will they be filed in court for any purpose including, but not limited to, post-conviction ineffective assistance of counsel/habeas claims.*
5. *Bar complaints must be filed with the State Bar of Nevada Office of Bar Counsel, not the Department of Indigent Defense Services.*
6. *The Department does not provide legal advice.*

*432B matters (parental rights termination) are not related to indigent defense services and are civil matters (not criminal).*

Department of Indigent Defense Services
751 Basque Way
Carson City, Nevada 89706
dids.nv.gov
775-687-8490
**Justice Equity Support.**

--
Brittany K. Hunter, BA, PMP
Policy Expert | Public Service & Advocacy
[redacted]
775.203.4591

**From:** Homa Sayyar
**To:** [redacted]
**Cc:** DIDS Records Request
**Subject:** Re: Public Records Request: Purchase data
**Date:** Friday, August 14, 2026 2:57:20 PM
**Attachments:** Re Response to Public Records Request Purchase data.msg
Re_ Response to Public Records Request_ Purchase data_ - Homa Sayyar - Outlook.pdf
Outlook-A logo for.png

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Good afternoon,

I have attached our email exchange from March of 2026 where you made this inquiry and I provided detailed information about the agency that does have this information and how you can obtain that information from their website. You had thanked me at the time and I can confirm that the instructions/information I shared with you on March 4, 2026 have not changed since then.

We consider this request resolved and closed.

Regards,

Homa Sayyar

**Homa Sayyar (she/her)**
Deputy Director
Nevada Department of Indigent Defense Services
751 Basque Way
Carson City, NV 89706
(775) 687-8490
homasayyar@dids.nv.gov

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**From:** Justin Wenig [redacted]
**Sent:** Friday, August 14, 2026 5:18 AM
**To:** DIDS Records Request <DIDSrecordsreq@dids.nv.gov>
**Subject:** Public Records Request: Purchase data

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Public Records Officer,
Pursuant to the Nevada Public Records Act, I am requesting existing electronic records maintained by

Nevada Department of Indigent Defense reflecting payment records for all vendor entities (companies, organizations, contractors, and other non-person payees) from January 1, 2026 to current date, including at minimum:

- Purchase date
- Vendor name
- Line-item description
- Line-item amount

If vendor names are coded, please include the existing vendor list/key.
Examples of responsive records: AP vendor history, check register, procurement report, PO detail report, warrant/claims report, PO history report. These are illustrative only. Any existing report containing the requested fields is responsive. I am not requesting creation of a new record.
This request concerns non-person transactions. If personnel payments (payroll, stipends, reimbursements) appear in the same report, no separation is needed; the report as-is fulfills this request.
I am requesting existing electronic records only (no copying, scanning, or printing).
If misrouted, please forward to the correct contact and reply with that contact's information.
If denied in whole or part, please cite the specific exemption for each denial and provide all segregable non-exempt portions.
Please reach out if any clarification would help expedite this request.
Thank you for your attention and cooperation.
Sincerely,
Justin Wenig

Outlook

**Re: Response to Public Records Request "Purchase data"**

**From** Justin [redacted]
**Date** Wed 3/4/2026 10:17 PM
**To** Homa Sayyar <homasayyar@dids.nv.gov>
**Cc** DIDS Records Request <DIDSrecordsreq@dids.nv.gov>

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Homa,

Thank you very much for your detailed and helpful response. I truly appreciate the time you took to explain the structure of Nevada's procurement systems and to provide step-by-step guidance on how to locate the relevant purchase order and expenditure information.

The information regarding NevadaEPro and the Nevada State Controller's open budget resources is very helpful, and I will review those systems using the parameters you described. I also appreciate the clarification regarding vendor definitions under Nevada law and the additional context you provided.

Thank you again for your assistance and for pointing me to the appropriate public resources. Your guidance is greatly appreciated.

Sincerely,
Justin

On March 4, 2026 at 4:15 PM EST homasayyar@dids.nv.gov wrote:

Good afternoon,

Thank you for your recent records request received via e-mail dated February 25, 2026. We are not the custodian of the information you've requested but I've provided responsive information about where that information would be located with State Purchasing and the Office of the Controller. Under NRS 239.0107(1)(b), if the governmental entity to which you have submitted your request does not have legal custody or control of the public record, it is to provide the requesting party:

1) Notice of the fact it does not have legal custody or control and
2) Give the name and address of the governmental entity that has that custody or control, if known.

You requested payment records (including purchase date, vendor name, description of goods/services purchased, quantity, and price/amount). You also narrowed your inquiry to "non-person/vendor entities" but under Nevada law (NRS 0.039, a "person" means "a natural person, any form of business or social organization and any other nongovernmental legal entity including, but not limited to, a corporation, partnership, association, trust or unincorporated organization." I don't believe it was your intent to exclude business entities so my further detail below includes vendor information as a category. Even sole proprietors have business entities they operate under in case that information is helpful.

As you may be aware, state agencies are often supported by centralized procurement entities. In Nevada, Nevada State Purchasing (purchasing.nv.gov) is our centralized procurement agency. As they receive requests often, they keep their system of record publicly via nevadaepro.com. So the good news is that you may not need another records request. I will walk through how to access that publicly available information in case it is of assistance:

If you search under purchase orders at nevadaepro.com, you can search purchase orders by choosing the "advanced" link to the right of the orange magnifying glass icon. If you just search "indigent" under purchase orders from the drop down, you'd get other agency purchases (including corrections), so the advanced search can narrow your focus.

Under the advanced search, select "purchase orders" from the drop down. The department drop down is where you will select the Department of Indigent Defense Services. For the date, you can select the Sent Date from January 1, 2025 to present day to align with your written request. I just searched and it returned 39 entries. You will see that many are actually under the Nevada State Public Defender because they are grouped under our department in NevadaEPro.

If you click on any listed purchase order, it will take you to a page with more information about the amount, goods, even the contract under which the purchase was made. You can use the contract number to do another search for the information about the given contract. This will cover the date, vendor name, and purchase date components. You will see the item description covers the other information you were asking about. If you click agency attachments you can see quotes and other supporting documentation uploaded into the system. As I mentioned, the system is where the records are kept and the legal custodian is Nevada State Purchasing. I hope that helps you in your search.

For additional information about state contracting and vendors, you may use a system of the Nevada State Controller's Office at openbudget.nv.gov or open.nv.gov. Our department code is 11 and we have two budgets, 1008 (DIDS) and 1499 (the public defender). If you start here: https://openbudget.nv.gov/OpenGov/ViewActualDetail.aep?fiscalYear=2025&type=Exp&view=Department&departmentCode=11 you can then click a budget and then see sub categories. If you click on category 04, operating, you will see further narrowing of purchases, down to the vendor names and fiscal year expenditures.

The information will also get you to identifying vendor information if vendor numbers are used anywhere in the above. Please feel free to share these government funded open resources with your customers and emphasize that if they are interested in working with the state, they should sign up for NevadaEPro.com's notices. Some vendors inadvertently disqualify themselves from opportunities by contacting agencies directly if they have an open RFP. Nevada also utilizes statewide contracts and cooperatives (such as NASPO or Omnia) contracts and those would be available through those non-Nevada entities. You may wish to sign up yourself for NevadaEPro and get ongoing notices of opportunities posted there. The purchase order tool is very helpful and continuously updated.

We now consider this request completed in full ad closed within the statutory period. While we are not the legal custodian of your requested records, I did provide instructions on publicly available information that is responsive.

**Homa Sayyar (she/her)**
Deputy Director
Nevada Department of Indigent Defense Services
751 Basque Way
Carson City, NV 89706
(775) 687-8490
homasayyar@dids.nv.gov

**From:** Justin Wenig [redacted]
**Sent:** Wednesday, February 25, 2026 7:27 AM
**To:** DIDS Records Request <DIDSrecordsreq@dids.nv.gov>
**Subject:** Public Records Request: Purchase data

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Public Records Officer,

Pursuant to the Nevada Public Records Act, I am requesting access to and copies of the following public records possessed by Nevada Department of Indigent Defense:

All purchase orders and/or payment records for non-person/vendor entities, such as companies, organizations, or contractors from January 1, 2025 to current date. Records should include, at minimum:

- Purchase date
- Vendor name
- Line item description
- Line item quantity
- Line item Amount

If vendor names are coded in the file, please provide a vendor list with corresponding codes.

Examples of relevant reports/records may include: check registers, procurement reports, standard PO detail reports, warrant/claims reports, and purchase order history reports, among others.

This request excludes any purchase orders or payments issued to staff, employees, or individuals for payroll, reimbursements, stipends, or other personnel-related expenses.

I am requesting existing, already maintained electronic records (without copying, scanning, or printing).

If this request was misrouted, please forward to the correct contact person and reply to this communication with the appropriate contact information.

Should this request be denied wholly or partially, please provide a detailed justification for each decision, citing specific exemptions. Additionally, I request that all segregable portions of otherwise exempt material be provided.

Should you need further information or clarification to expedite this request, do not hesitate to reach out.

Thank you for your attention and cooperation. I look forward to your prompt response within the statutory period.

Sincerely,

Justin Wenig

**From:** Josh Parker
**To:** AGGeneralCounsel
**Subject:** PRTF Survey – State of Nevada DMV
**Date:** Friday, October 9, 2026 4:41:06 PM
**Attachments:** ir005.pdf
Outlook-z3pb4uvl.png
Outlook-cion4goz.png
Outlook-bopc4hkm.png
Outlook-ygrmeqpj.png
Outlook-4o2wen3v.png

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Good afternoon,

Attached are the Nevada DMV's responses to the Public Records Task Force survey request, including:

1. Up to three examples of public records requests deemed overbroad or unduly burdensome; and
2. The DMV Records Division fee schedule for record inquiries.

Example 1: Broad Email Request

Request: "Provide all emails, text messages, Teams messages, and attachments sent or received by DMV leadership relating to vehicle registration, licensing, enforcement, and customer service from January 1, 2023 through December 31, 2025."

Why the request was burdensome:

- Required searches across multiple communication platforms and custodians.
- Generated a very large volume of potentially responsive records.
- Required extensive review to identify privileged, confidential, and non-responsive information.
- Significant staff time was needed to coordinate collection, review, and redaction efforts.

Example 2: Statewide Operational Records Request

Request: "Provide all records concerning wait times, staffing levels, training, customer complaints, and office operations for every DMV office statewide for the past five years."

Why the request was burdensome:

- Information was distributed among numerous offices, systems, and record custodians.
- Some records were maintained in different formats and required manual compilation.
- The request covered a lengthy time period and a broad range of topics.
- Substantial staff resources were required to locate, organize, review, and produce responsive records.

Example 3: Records Related to a Specific Program or Contract

Request: "Produce all records regarding the procurement, implementation, operation, maintenance, communications, meetings, invoices, contracts, amendments, and performance evaluations related to a specific DMV technology project."

Why the request was burdensome:

- The request sought nearly every category of record associated with a multi-year project.
- Responsive records existed in emails, contracts, meeting materials, project files, and vendor communications.
- Extensive review was necessary to separate public information from confidential, proprietary, security-sensitive, or privileged information.
- The volume of records required significant time for collection, review, and redaction.

Please let me know if any additional information or clarification is needed.

**JOSH PARKER** | Records Administrator | Chief Data Officer
**Nevada Department of Motor Vehicles**
555 Wright Way, Carson City, NV 89711
Work: (775)684-4676
Email: jwparker@dmv.nv.gov

**From:** Daniel Rapaport
**To:** Dept Admin
**Cc:** AGOMLA
**Subject:** I need Nevada State protection from Colorado mass murder cannibal sheriffs.
**Date:** Thursday, September 10, 2026 9:26:19 AM

You don't often get email from danielrapaport3@gmail.com. Learn why this is important

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

I need Nevada State protection from Colorado mass murder cannibal sheriffs.
This is a mass murder cannibal case and home invasion case and it is in traffic court.

I am Daniel Eric Rapaport – [redacted] and [redacted] Call anytime.

I am a 160-million dollar theft victim. The thieves took the money by way of bank robbery and real estate theft.
I have been head of the writing department for Fox for most of my life whether they admit it or not.

I recently got attacked by some Garfield County Colorado Sheriffs who home invaded me many years ago at:
907 Waters Aspen Colorado and at
414 AABC #E Aspen Colorado.
The home invaders told me that my condo had to be rebuilt due to hydrochloric acid damage which happened when they
were pouring hydrochloric acid all over Aspen High School Students. I did see and smell some of the students that were murdered and my condo that I bought and that was damaged.

These sheriffs did murder civilians in front of me recently.

They charged me with false driving charges and they will probably kill me if I go back to court up there.
I don't think that there is any way that they would let me live in the face of all of this.

I am trying to get the traffic case moved from Colorado to Nevada so that they do not kill me for being a witness and a home invasion victim.

How do I get the traffic case moved to Nevada after they said no?

I don't think that a lawyer is going to be able to save me from them.
I do think that you might be able to help me move the case or get me federal protection and prosecute the thieves and murders.

Thank you
Daniel Rapaport

[redacted]

Garfield County Sheriff's Office
970-625-8095
Summons and Compaint Citation 42-4-1301(1)(a) Drugs
Case 2026-00009969

The following is a correspondence between the DA and myself:

This is the DA Megan Bench <mbench@9daco.org>

**From:** Daniel Rapaport [redacted]
**Sent:** Thursday, August 27, 2026 8:00 AM
**To:** Megan Bench <mbench@9daco.org>
**Subject:** Case and blood test move to Nevada please from Daniel Rapaport

**This Message is from an External Sender**

Now that I am in Nevada and now that I am trying not to ever return to Colorado:
Could I please get the entire case and blood test moved to Nevada?
I am not guilty of driving impaired.

Thank you
Daniel Rapaport
[redacted]

Response – No that is not an option.

The full list of houses and bank accounts that I am missing are on:
www.TheftCase.Com

www.TheftCases.com

This has no place in traffic court. It is a mass murder case and they are falsely charging me with traffic violations in order to get me to leave them alone.

If we cannot dismiss the case, could we move the traffic case from Colorado to your traffic court or a Nevada traffic court where I live?

**From:** no-reply@efilingmail.tylertech.cloud
**To:** Dept Admin
**Subject:** Notification of Service for Case: 26E000151, Sid Jawanda, Landlord(s)vs.Brandon Adams, Tenant(s) for filing Service Only, Envelope Number: 18763809
**Date:** Wednesday, September 23, 2026 5:31:59 PM

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

# Notification of Service

Case Number: 26E000151
Case Style: Sid Jawanda, Landlord(s)vs.Brandon Adams, Tenant(s)
Envelope Number: 18763809

This is a notification of service for the filing listed. Please click the link below to retrieve the submitted document.

| Filing Details | |
|---|---|
| **Case Number** | 26E000151 |
| **Case Style** | Sid Jawanda, Landlord(s)vs.Brandon Adams, Tenant(s) |
| **Date/Time Submitted** | 9/23/2026 5:30 PM PST |
| **Filing Type** | Service Only |
| **Filing Description** | Case 6:26-cv-02046-PGB-NWH Clerk Megan Mann 18 U.S. Code 2076 - Clerk of United States District Court Whoever, being a clerk of a district court of the United States, willfully refuses or neglects to make or forward any report, certificate, statement, or document as required by law, shall be fined under this title or imprisoned not more than one year, or both. 18 U.S. Code 2071 - Concealment, removal, or mutilation generally (a) Whoever willfully and unlawfully conceals, removes, mutilates, obliterates, or destroys, or attempts to do so, or, with intent to do so takes and carries away any record, proceeding, map, book, paper, document, or other thing, filed or deposited with any clerk or officer of any court of the United States, or in any public office, or with any judicial or public officer of the United States, shall be fined under this title or imprisoned not more than three years, or both. (b) Whoever, having the custody of any such record, |

| | |
|---|---|
| | proceeding, map, book, document, paper, or other thing, willfully and unlawfully conceals, removes, mutilates, obliterates, falsifies, or destroys the same, shall be fined under this title or imprisoned not more than three years, or both; and shall forfeit his office and be disqualified from holding any office under the United States. As used in this subsection, the term office does not include the office held by any person as a retired officer of the Armed Forces of the United States. Documents served USPS 18 USC 241 |
| **Filed By** | Brandon Adams |
| **Service Contacts** | Brandon Adams:<br><br>Brandon Adams [redacted]<br><br><br>Results Realty:<br><br>Tammy Abbott [redacted]<br><br><br>Other Service Contacts not associated with a party on the case:<br><br>Amari Adams [redacted]<br><br>Joy Grimmer (deptadmin@admin.nv.gov)<br><br>Francisco Aguilar (sosmail@sos.nv.gov)<br><br>Elizabeth Brown (aocmail@nvcourts.nv.gov)<br><br>Aaron Ford (AGInfo@ag.nv.gov)<br><br>Denise McKay (denise.mckay@admin.nv.gov)<br><br>Gary Vause (ncjdinfo@judicial.nv.gov)<br><br>Elizabeth Bern (jic@jic.alabama.gov)<br><br>Jasmine Price (RealEstateCompliance@red.nv.gov)<br><br>Kristyn Travis (nvdocs@drsltd.com)<br><br>Robert Conrad (conradr@uscourts.gov) |

| | |
|---|---|
| | Robert Conrad (conradr@ao.uscourts.gov) |

| Document Details | |
|---|---|
| **Served Document** | Download Document |
| This link is active for 548 days. To access this document, you will be required to enter your email address. Click here for more information. | |

**From:** John Red
**To:** cyber cat[redacted]; Alex[redacted] Ask CRT; Aging and Disability Services Division; [redacted] Complaint; Cywatch@ic.fbi.gov; [redacted] Medicaid; George Knapp - KLAS TV CBS 8; Katie Marshall (DHHS); Member Services; ABA Member Service; mayor@utah.gov; mmchelp.dhhs@maine.gov; v-kwhittaker@microsoft.com; Keep Nevada Safe; [redacted] vaoighotline@va.gov; vet-experince@va.gov; VHAROCPatientExperience@va.gov; [redacted] vets-experience@va.gov; vulnerability.disclosure.prog@hq.dhs.gov; Vanessa Murphy; [redacted] Paulina Campbell; [redacted] John Red; PCII-Assist@mail.cisa.dhs.gov; SEESAY; SOS Customer Service; eapratt@utah.gov; ethics@mspb.gov; ethics@mrsp.gov; westrenRO@cms.hhs.gov; SAF.MR.DRB.workflow@us.af.mil; Angela Anderson (DHHS); Dept Admin; agingservices@utah.gov; [redacted]; Renew My Medicaid; [redacted]
**Subject:** Ok
**Date:** Thursday, September 17, 2026 8:35:35 PM

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**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Public documentation and video material concerning these allegations has been published on my YouTube channel. I request that investigators independently preserve, authenticate, and review the relevant videos and associated technical evidence.

https://www.youtube.com/[redacted]

PUBLIC / REDACTED AFFIDAVIT OF ALEX EVANS

I, Alex Evans, being duly sworn, hereby state under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. Personal Information

Name: Alex Evans

Date of Birth: [REDACTED]

Last 4 of SSN: [REDACTED]

Current Location: [REDACTED]

Email: [REDACTED]

Phone: [REDACTED]

Personal identifying and contact information has been redacted from this public version. An unredacted version may be provided directly to authorized investigators, attorneys, agencies, or other appropriate officials.

2. Purpose of Affidavit

This affidavit is submitted to document and request investigation into allegations involving racial discrimination, disability discrimination, retaliation, medical negligence/malpractice, civil rights violations, unsafe discharge, administrative misconduct, and alleged cyber harassment involving the Salt Lake City VA, University of Utah Hospital, and VA VR&E personnel.

I request that this affidavit be accepted as a formal sworn statement for investigative, administrative, and legal review.

3. Unsafe Hospital Discharge – University of Utah Hospital (July 9, 2026)

On July 9, 2026, I was discharged from the University of Utah Hospital under circumstances that I believe were unsafe and inappropriate.

Hospital security personnel transported me in a wheelchair to a public bus/train station despite the following circumstances:

I am unable to independently self-propel a wheelchair;
I did not have what I believe was a safe discharge plan;
I was medically unstable;
I was not provided transportation or adequate assistance; and
I believe appropriate disability-related accommodations were not provided.

I request an investigation into whether the circumstances of this discharge complied with applicable federal and state requirements, including applicable hospital discharge requirements, disability-access requirements, and other protections applicable to my circumstances.

Video evidence: A video documenting relevant events has been provided separately and should be preserved and reviewed as evidence.

4. Medical Placement – Monument Health Stonecreek, Bountiful, Utah

I was placed at Monument Health Stonecreek, a rehabilitation facility, despite my belief that I did not have a rehabilitation-qualifying condition requiring that placement.

I believe the placement was:

medically inappropriate;
outside my proper service area;
made without adequate clinical justification; and
harmful to my health and safety.

I request an independent review of the medical records, placement decision, clinical justification, referral process, and circumstances surrounding this placement.

I further request investigation into whether disability discrimination, administrative negligence, medical negligence, or other violations occurred.

5. VA VR&E Conduct and Retaliation Allegations (2020–2024)

I was accepted into VA Vocational Rehabilitation and Employment (VR&E) in October 2020, but my program was delayed until November 2021, which I believe resulted from administrative failures.

I subsequently graduated in February 2023 with a 3.97 GPA.

In August 2023, I was removed from VR&E. I dispute the stated reasons for my removal and believe I was improperly denied continued participation in the program.

My complaints were repeatedly closed with statements that I believe were inaccurate or contradicted by the available records.

Individuals whose conduct I request investigators review include:

Lauren Castillo;
Justin Whipple; and
other VR&E personnel involved in the relevant decisions and complaint responses.

I contend that records concerning my communication with VR&E should be reviewed to determine whether statements that I refused communication or stopped communicating were accurate.

In 2024, I contend that statements made by VR&E personnel to law enforcement contributed to a SWAT response at my apartment.

I further contend that the criminal charges were ultimately dropped at jury selection and that the government acknowledged that it did not know the extent of my disability, despite my contention that VR&E possessed substantial documentation concerning my disabilities.

I request an independent review of the underlying records, communications, referrals, law-enforcement contacts, and decision-making involved in these events.

6. Ongoing Retaliation, Suppression, and Cyber-Harassment Allegations

I continue to report what I believe to be retaliation, suppression, and cyber-related attacks directed toward me.

Public documentation concerning these allegations is available through my public YouTube channel.

I request that investigators review the evidence independently and determine whether any unlawful retaliation, harassment, interference, or other misconduct has occurred.

Individuals whose conduct I request be reviewed include:
Lynn Horwatt;
Lauren Castillo;
Justin Whipple; and
any other personnel determined through investigation to have participated in the alleged conduct.

7. Requested Actions

I respectfully request:

Assignment of a formal case or reference number and initiation of an appropriate investigation.
Investigation of the circumstances surrounding my July 9, 2026 discharge from the University of Utah Hospital.
Review of whether applicable disability-access, discharge, and patient-safety requirements were followed.
Review of my placement at Monument Health Stonecreek, including the medical and administrative justification for that placement.
Investigation into the conduct of VA VR&E personnel and the handling of my VR&E case.
Review of statements allegedly made to law enforcement and their relationship to the 2024 SWAT response.
Review of my disability documentation and whether relevant personnel had access to or knowledge of that documentation.
Investigation of my allegations of retaliation, discrimination, suppression, and cyber harassment.
Preservation and review of relevant medical records, VR&E records, emails, messages, complaint records, security records, transportation records, video surveillance, and other evidence.
Protection against further retaliation or discrimination for reporting these matters.

8. Evidence and Documentation

I have identified and/or possess documentation that I believe may be relevant to these allegations, including:

medical records;
hospital discharge documentation;
VR&E records;
correspondence and emails;
complaint records;
law-enforcement-related records;
video evidence;
electronic communications; and
other supporting documentation.

I request that relevant agencies and institutions preserve potentially responsive records, including electronic records and video surveillance, to prevent loss or destruction of evidence.

9. Declaration Under Penalty of Perjury

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on: _____

Location: _____

Signature: _____

Printed Name: Alex Evans

PUBLIC REDACTION NOTICE

This public version intentionally omits personally identifying and sensitive information, including date of birth, Social Security information, telephone number, email address, and current medical location.

The unredacted affidavit may be provided directly to authorized governmental investigators, attorneys, courts, or other appropriate officials when necessary to verify the identity of the

affiant and investigate the allegations.

Privilege escalations hacking that is highly illegal.

VR&E Misconduct Documentation

VR&E Timeline Summary

• Oct 2020: Accepted into VR&E for DeVry cybersecurity program.
• Nov 2021: Finally allowed to start due to VR&E delays under Lynn Horwatt.
• Feb 25, 2023: Graduated with 3.97 GPA, dean's list.
• Aug 2023: Removed from VR&E despite completing program and despite ongoing communication.
• Aug 2023: You filed daily complaints with White House VA Hotline.
• Lauren Castillo (Reno VREO) repeatedly closed your complaints falsely claiming "We already discussed this."
• Justin Whipple removed you from VR&E claiming you "stopped communication," contradicting Castillo's claim.
• 2024: VR&E allegedly lied to law enforcement → federal charges filed.
• Aug 2024: Your apartment was SWATed.
• Early 2025: Charges dropped at jury selection; they claimed they "didn't know how disabled" you were — despite VR&E having full documentation.

Illegal hacking, please help. https://www.youtube.com/@[redacted]

This is a pattern of administrative abuse, negligence, and retaliation.

https://www.youtube.com/@[redacted]

Please investigate lynn.horwatt@va.gov lauren.castillo@va.gov
Justin.Wipple@va.gov
Jasonn.randolph@va.gov

https://www.youtube.com/@[redacted]

**RECEIVED**
*By John Genard at 2:16 pm, Jun 02, 2026*

**John Genard**

**From:** Shirley Tanaka [redacted]
**Sent:** Tuesday, June 2, 2026 12:33 PM
**To:** B&I Director's Office; Public Records; Consumer Services; Insurance Commissioner; B&I Public Information Office
**Subject:** Request for State of Nevada Public Records

**Follow Up Flag:** Follow up
**Flag Status:** Flagged

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

- Hello Public Records Custodians,
- By the authority of the Nevada public records laws, I request public records maintained by the Department of Business and Industry Director's Office and the Nevada Division of Insurance concerning the employee climate survey distributed to Division of Insurance personnel during calendar year 2025 and the leadership, operational, staffing, and organizational actions, communications, recommendations, and decisions arising from that survey and related employee feedback.

  My Nevada public records requests are:

  1. I am requesting records related to the climate survey itself, including the survey distributed to employees, survey results, summaries, reports, spreadsheets, PowerPoint presentations, draft analyses, talking points, meeting notes, memoranda, calendars or meeting invitations referencing the survey, and communications transmitting, summarizing, presenting, discussing, evaluating, or responding to the survey results.

  2. I am requesting executive summaries, briefing materials, presentations, reports, memoranda, action plans, recommendation documents, implementation plans, and related communications prepared for or provided to Perry Faigin, Kristopher Sanchez, Marcel Schaerer, Nikki Haag, Amanda Flocchini, Ned Gaines, Nick Stosic, Alexia Emmermann, or the Director's Office concerning actions recommended, considered, approved, or taken in response to the climate survey. This request includes records reflecting final recommendations, approved actions, implementation efforts, or leadership decisions arising from the climate survey.

  3. I am requesting communications distributed to all Division of Insurance employees, or to substantial portions of Division of Insurance employees, by Perry Faigin, Kristopher Sanchez, Marcel Schaerer, Nikki Haag, Amanda Flocchini, Ned Gaines, Nick Stosic, Alexia Emmermann, or the Director's Office concerning Scott Kipper's departure, interim leadership, the appointment of Ned Gaines, the climate survey, organizational changes, restructuring efforts, staffing changes, employee morale, or operational direction during calendar year 2025. Responsive records include agency-wide emails, division-wide emails, employee announcements, leadership updates, presentations, memoranda, meeting invitations, Teams announcements, and other communications distributed broadly to Division of Insurance personnel.

4. I am requesting records concerning the individual meetings or listening sessions conducted by Perry Faigin with Division of Insurance employees following Scott Kipper's departure and during the subsequent leadership transition period, including meeting invitations, calendar entries, attendee lists, agendas, notes, summaries, talking points, follow-up communications, records reflecting action items, and records sufficient to identify the dates, participants, purpose, and any documented follow-up actions resulting from those meetings.

For purposes of this request, responsive records include records maintained in email systems, Teams or chat systems, calendars, meeting invitations, shared drives, and other repositories used to conduct agency business. Further, I am not seeking individually identifiable employee responses, employee performance evaluations, disciplinary materials, medical information, or materials directly relating to any specific employee's performance or conduct. To the extent such information appears in responsive records, I request production with appropriate redactions rather than withholding records in full.

If any portion of these requests would benefit from narrowing, please let me know and I am happy to work with you so the requests can be handled efficiently. If no responsive records are located for any request category, please identify the custodians, systems, repositories, and record locations searched for that category. If any portion of this request is denied on the basis of confidentiality, privilege, or exemption, please identify the specific category of records withheld and the specific statutory or legal authority relied upon.

Please provide the records in electronic format and no fees. Please provide your response within the time required by the Nevada public records law.

**RECEIVED**
**By Nick Doyle at 2:20 pm, Aug 17, 2026**

Outlook

## Important Nevada Public Records Request

**From** Shirley Tanaka [redacted]
**Date** Mon 8/17/2026 11:18 AM
**To** Public Records <publicrecords@doi.nv.gov>; NV Insurance <insinfo@doi.nv.gov>; Consumer Services <cscc@doi.nv.gov>; Legal <legal@doi.nv.gov>

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

PUBLIC RECORDS REQUEST

Under the authority of the Nevada public records law, I request public records maintained from November 2023 through the present concerning instances in which the Department of Business and Industry Director's Office became involved in matters that were otherwise being handled by your division, board, commission, bureau, program, or agency.

Specifically, I am requesting records involving Perry Faigin, Dr. Kristopher Sanchez, Marcel Schaerer, Nikki Haag, Amanda Flocchini (Johnson) or other Director's Office employees when they reviewed, commented on, participated in, approved, rejected, modified, delayed, directed, recommended, or otherwise became involved in a matter that was originally being handled within your office.

This request includes, but is not limited to, matters involving:

- Enforcement actions;
- Investigations;
- Licensing decisions;
- Administrative complaints;
- Settlement discussions;
- Penalty recommendations or assessments;
- Audits or examinations;
- Regulatory actions;
- Employee misconduct investigations; (including but not limited to timesheet fraud, sexual misconduct, or substance abuse)
- Ethics complaints;
- Conflicts of interest;
- Retaliation complaints;
- Personnel investigations;
- Workplace safety concerns;
- Misuse of state resources; and
- Other matters requiring a significant decision or approval by your agency.

I am interested in understanding the extent to which the Director's Office became involved in decisions that would ordinarily be made by the individual divisions, boards, commissions, bureaus, programs, or agencies within the Department.

This request is not limited to final decisions. It also includes situations where the Director's Office was consulted before a decision was made, asked to provide input, requested updates, attended meetings concerning a matter, requested additional information, or otherwise participated before the matter was resolved.

Please include records such as emails, Microsoft Teams messages, text messages, memoranda, meeting invitations, calendars, briefing materials, presentations, notes, routing communications, recommendations, draft decision documents, approval requests, status updates, attachments, and similar records reflecting the Director's Office's involvement.

If responsive records are maintained by both your office and the Director's Office, please search both locations for responsive records.

To assist in locating responsive records, searches may include communications referencing Perry Faigin, Kristopher Sanchez, Marcel Schaerer, Nikki Haag, Amanda Flocchini (Johnson), the Director's Office, Director Sanchez, enforcement, settlement, investigation, licensing, penalty, audit, examination, personnel matter, fraud, employee complaint, ethics, retaliation, conflict of interest, management review, or similar terms.

If any records are withheld or redacted, please identify the specific statutory basis for the withholding and produce all reasonably segregable nonconfidential portions as required by the Nevada public records law.

I request production in electronic format.

# Parole and Probation (#B026231-011725)

## Parole and Probation Details

| | |
|---|---|
| Is this request COVID-19 related?: | No |

| | |
|---|---|
| Describe the Record(s) Requested: | Hello,<br><br>As you are aware, this office represents Travis Low.<br><br>I have received the records of credits applied to Mr. Low's termination date from the Attorney General's office. I am enclosing a copy of those for your reference.<br><br>I note a number of credits have not been applied. First, Mr. Low was employed full time by Fisher Sand and Gravel until late October 2023, I am in possession of the termination letter from Fisher should you require it to correct your records. The date of the letter is October 17, 2023. It appears that P&P stopped giving him credit after he was disabled in an industrial injury and required to work light-duty at a charitable organization by his employer. On his report it shows he did not receive work credits for July, August, September or October 2023. Amounting to 40 missing credits. It bears mentioning that Mr. Low is also represented by attorneys in California for a wrongful dismissal claim against Fisher, though that does not really bear on the calculation of credits.<br><br>Mr. Low was receiving workers compensation until March of 2024, when his workers compensation litigation, which I served as attorney on, was settled, and Mr. Low received a lump sum payment for his disability. He was certified as disabled and unable to perform his construction job by medical professionals through February of 2024. Mr. Low previously provided the medical records to Officer Jacobs, but I also have them should you require them, as I was on the legal team for the worker's comp case. The missing credits for 11/23, 12/23, 1/24, and 2/24 amounts to an additional 40 days of credits. As you may be aware, Federal law requires that disabled individuals be able to earn work credits just as able-bodied parolees. Penalizing disability is a violation of federal law.<br><br>Finally, Mr. Low was not given his 20 fiscal credits for the month of 11/24. Our offices personally paid his supervision fees on 11/22/24 and confirmed his account was in good standing as of that date.<br><br>Mr. Low's PEXD is 2/4/25 with the 100 missing credits applied, he should have already expired. months ago.<br><br>I also note that Mr. Low did not receive FLAT/STAT time beginning in May of 2024. However, the law requires that a parolee conceal their whereabouts from Parole for a period of 60 days before they can be considered to have absconded. Mr. Low visited his parole officers at summerlin command in May of 2024,therefore, the earliest he could be considered to have absconded was after the expiration of 60 days, in August this is another approximately 100 days of flat/stat time that is missing.<br><br>Please let me know whether you will take care to correct the identified missing credits as soon as possible so that we may avoid the need for court intervention.<br><br>Thank you for your attention to this matter, your work is appreciated. |
| Are you a member of the media?: | No |

Preferred Method to Receive Records: Electronic via Records Center

## Payment Information

## For Public Archive Use Only

## SB 302 Reporting

PII Released?: This field is not visible to customers.

Publish Request to Portal: No

***This will publish this request online and make it available to the public.***

## Notes

| Note | Created | Modified |
|---|---|---|
| The Nevada Department of Public Safety, Division of Parole and Probation has been advised by the requestor that this is not a Public Records Request and therefore this will be closed immediately. | 1/21/2025 2:30:00 PM by Michelle Nader | 1/21/2025 2:30:00 PM by Michelle Nader |

## Message History

Date

On 1/21/2025 2:42:27 PM, Michelle Nader wrote:

Date

**Subject:** [Records Center] Parole and Probation :: B026231-011725
**Body:**

Nevada Department of Public Safety
Dedication Pride Service

RE: PUBLIC RECORDS REQUEST of January 17, 2025., Reference # B026231-011725.

Dear Allison Schmidt:

On January 17, 2025, the Nevada Department of Public Safety received your request for documents pursuant to Nevada' s Public Records Law.

Records Requested: "Hello,

As you are aware, this office represents Travis Low.

I have received the records of credits applied to Mr. Low's termination date from the Attorney General's office. I am enclosing a copy of those for your reference.

I note a number of credits have not been applied. First, Mr. Low was employed full time by Fisher Sand and Gravel until late October 2023, I am in possession of the termination letter from Fisher should you require it to correct your records. The date of the letter is October 17, 2023. It appears that P& P stopped giving him credit after he was disabled in an industrial injury and required to work light-duty at a charitable organization by his employer. On his report it shows he did not receive work credits for July, August, September or October 2023. Amounting to 40 missing credits. It bears mentioning that Mr. Low is also represented by attorneys in California for a wrongful dismissal claim against Fisher, though that does not really bear on the calculation of credits.

Mr. Low was receiving workers compensation until March of 2024, when his workers compensation litigation, which I served as attorney on, was settled, and Mr. Low received a lump sum payment for his disability. He was certified as disabled and unable to perform his construction job by medical professionals through February of 2024. Mr. Low previously provided the medical records to Officer Jacobs, but I also have them should you require them, as I was on the legal team for the worker's comp case. The missing credits for 11/23, 12/23, 1/24, and 2/24 amounts to an additional 40 days of credits. As you may be aware, Federal law requires that disabled individuals be able to earn work credits just as able-bodied parolees. Penalizing disability is a violation of federal law.

Finally, Mr. Low was not given his 20 fiscal credits for the month of 11/24. Our offices personally paid his supervision fees on 11/22/24 and confirmed his

Date

account was in good standing as of that date.

Mr. Low's PEXD is 2/4/25 with the 100 missing credits applied, he should have already expired. months ago.

I also note that Mr. Low did not receive FLAT/STAT time beginning in May of 2024. However, the law requires that a parolee conceal their whereabouts from Parole for a period of 60 days before they can be considered to have absconded. Mr. Low visited his parole officers at summerlin command in May of 2024, therefore, the earliest he could be considered to have absconded was after the expiration of 60 days, in August this is another approximately 100 days of flat/stat time that is missing.

Please let me know whether you will take care to correct the identified missing credits as soon as possible so that we may avoid the need for court intervention.

Thank you for your attention to this matter, your work is appreciated."

The Nevada Department of Public Safety, Division of Parole and Probation has been advised by the requestor that this is not a Public Records Request and therefore this will be closed immediately.

Please do not hesitate to contact us with any questions or concerns. Thank you.
Sincerely,

NPP Records
Parole and Probation
Nevada Department of Public Safety

Date

On 1/17/2025 10:07:42 AM, Allison Schmidt wrote:

Date

TO: "Nevada Department of Public Safety"[nevadadps@govqa.us], "Shannon Serena"[sserena@dps.state.nv.us], "Romnick Joe Jacobs" [rjjacobs@dps.state.nv.us]
Hello, this is not a public records request - this is a demand to correct the credits that he has been given, which, according to NDOC and the Attorney General's office is the responsibility of P&P to correctly report. If the credits are not corrected by COB today I will proceed with a habeas petition and a federal civil action.
Thank you,

On Fri, Jan 17, 2025 at 8:45 AM Nevada Department of Public Safety wrote:

Dear Allison Schmidt:

Thank you for your interest in public records with the Nevada Department of Public Safety. Your request has been received and will be processed in accordance to the Public Information Law. Your request was received in this office on 1/17/2025 and given the reference number B026231-011725 for tracking purposes.
Records Requested: "Hello,

As you are aware, this office represents Travis Low.

I have received the records of credits applied to Mr. Low's termination date from the Attorney General's office. I am enclosing a copy of those for your reference.

I note a number of credits have not been applied. First, Mr. Low was employed full time by Fisher Sand and Gravel until late October 2023, I am in possession of the termination letter from Fisher should you require it to correct your records. The date of the letter is October 17, 2023. It appears that P&P stopped giving him credit after he was disabled in an industrial injury and required to work light-duty at a charitable organization by his employer. On his report it shows he did not receive work credits for July, August, September or October 2023. Amounting to 40 missing credits. It bears mentioning that Mr. Low is also represented by attorneys in California for a wrongful dismissal claim against Fisher, though that does not really bear on the calculation of credits.

Mr. Low was receiving workers compensation until March of 2024, when his workers compensation litigation, which I served as attorney on, was settled, and Mr. Low received a lump sum payment for his disability. He was certified as disabled and unable to perform his construction job by medical professionals through February of 2024. Mr. Low previously provided the medical records to Officer Jacobs, but I also have them should you require them, as I was on the legal team for the worker's comp case. The missing credits for 11/23, 12/23, 1/24, and 2/24 amounts to an additional 40 days of credits. As you may be aware, Federal law requires that disabled individuals be able to earn work credits just as able-bodied parolees. Penalizing disability is a violation of federal law.

Date

Finally, Mr. Low was not given his 20 fiscal credits for the month of 11/24. Our offices personally paid his supervision fees on 11/22/24 and confirmed his account was in good standing as of that date.

Mr. Low's PEXD is 2/4/25 with the 100 missing credits applied, he should have already expired. months ago.

I also note that Mr. Low did not receive FLAT/STAT time beginning in May of 2024. However, the law requires that a parolee conceal their whereabouts from Parole for a period of 60 days before they can be considered to have absconded. Mr. Low visited his parole officers at summerlin command in May of 2024, therefore, the earliest he could be considered to have absconded was after the expiration of 60 days, in August this is another approximately 100 days of flat/stat time that is missing.

Please let me know whether you will take care to correct the identified missing credits as soon as possible so that we may avoid the need for court intervention.

Thank you for your attention to this matter, your work is appreciated."

Your request will be forwarded to the relevant department to locate the information you seek. You will be contacted about the availability and/or provided with copies of the records in question.
You can monitor the progress of your request here:  My Records Center.
Nevada Department of Public Safety

Date

On 1/17/2025 8:44:48 AM, System Generated Message:

Date

**Subject:** Parole and Probation :: B026231-011725
**Body:** Dear Allison Schmidt:

Thank you for your interest in public records with the Nevada Department of Public Safety. Your request has been received and will be processed in accordance to the Public Information Law. Your request was received in this office on 1/17/2025 and given the reference number B026231-011725 for tracking purposes.

Records Requested: *"Hello, As you are aware, this office represents Travis Low. I have received the records of credits applied to Mr. Low's termination date from the Attorney General's office. I am enclosing a copy of those for your reference. I note a number of credits have not been applied. First, Mr. Low was employed full time by Fisher Sand and Gravel until late October 2023, I am in possession of the termination letter from Fisher should you require it to correct your records. The date of the letter is October 17, 2023. It appears that P&P stopped giving him credit after he was disabled in an industrial injury and required to work light-duty at a charitable organization by his employer. On his report it shows he did not receive work credits for July, August, September or October 2023. Amounting to 40 missing credits. It bears mentioning that Mr. Low is also represented by attorneys in California for a wrongful dismissal claim against Fisher, though that does not really bear on the calculation of credits. Mr. Low was receiving workers compensation until March of 2024, when his workers compensation litigation, which I served as attorney on, was settled, and Mr. Low received a lump sum payment for his disability. He was certified as disabled and unable to perform his construction job by medical professionals through February of 2024. Mr. Low previously provided the medical records to Officer Jacobs, but I also have them should you require them, as I was on the legal team for the worker's comp case. The missing credits for 11/23, 12/23, 1/24, and 2/24 amounts to an additional 40 days of credits. As you may be aware, Federal law requires that disabled individuals be able to earn work credits just as able-bodied parolees. Penalizing disability is a violation of federal law. Finally, Mr. Low was not given his 20 fiscal credits for the month of 11/24. Our offices personally paid his supervision fees on 11/22/24 and confirmed his account was in good standing as of that date. Mr. Low's PEXD is 2/4/25 with the 100 missing credits applied, he should have already expired. months ago. I also note that Mr. Low did not receive FLAT/STAT time beginning in May of 2024. However, the law requires that a parolee conceal their whereabouts from Parole for a period of 60 days before they can be considered to have absconded. Mr. Low visited his parole officers at summerlin command in May of 2024, therefore, the earliest he could be considered to have absconded was after the expiration of 60 days, in August this is another approximately 100 days of flat/stat time that is missing. Please let me know whether you will take care to correct the identified missing credits as soon as possible so that we may avoid the need for court intervention. Thank you for your attention to this matter, your work is appreciated."*

Your request will be forwarded to the relevant department to locate the information you seek. You will be contacted about the availability and/or provided with copies of the records in question.

You can monitor the progress of your request here: My Records Center.

Nevada Department of Public Safety

Date

Nevada Department of
**Public Safety**
Parole and Probation

On 1/17/2025 8:44:47 AM, Michelle Nader wrote:
Request was created by staff

## Request Details

| | |
|---|---|
| Reference No: | B026231-011725 |
| Created By: | Michelle Nader |
| Create Date: | 1/17/2025 8:44 AM |
| Update Date: | 1/21/2025 2:32 PM |
| Completed/Closed: | Yes |
| Close Date: | 1/21/2025 2:32 PM |
| Status: | Assigned |
| Priority: | Medium |
| Assigned Dept: | DPS - 652 Parole & Probation |
| Assigned Staff: | Michelle Nader |
| Customer Name: | Allison Schmidt |
| Email Address: | [redacted] |
| Phone: | 7029009049 |
| Group: | (Not Specified) |

Source: Email

# Parole and Probation (#B024732-091824)

## Parole and Probation Details

| | |
|---|---|
| Is this request COVID-19 related?: | No |
| Describe the Record(s) Requested: | Hello, I am an attorney representing Travis Low ([redacted]) with regard to an ABA claim and possible Habeas petition. My email address is allison@nevadaslawyers.com I have requested From Officer Romnick Jacobs and Lieutenant Shannon Serena the following records and reiterate the request under the Nevada's Public Records Act:<br>1. All written notices of any hearing, meeting or any other proceeding that were provided to Travis Low from 8/21/2024 to present.<br>2.Any written notice provided to Travis Low regarding the meeting that took place between Low, Jacobs and an unidentified 3rd parole officer at CCDC - North Valley Complex on 9/5/24.<br>3. The badge number or other identifying information for the officer who accompanied officer Romnick jacobs to the meeting or proceeding with Travis Low at CCEC North Valley Complex on 9/5/24<br>4. Body worn camera footage for Romnick Jacobs for his on-duty shift on 9/5/24.<br>5. a Copy of any document presented by Parole and Probation to Low for signing from 8/22/24 to present, and, if applicable, the signed copy.<br>6. Notices of any scheduled Parole Proceeding relating to Travis Low.<br>7. Records indicating how Mr. Low's current expiration date has been calculated, including what credits have been applied.<br>8. The e-mail address of anyone at Parole and Probation who we may send Mr. Low's medical records for his Workers Comp Disability, so that he may be properly credited for work time for the time he was unable to work due to his disability resulting from an industrial injury.<br><br>I have included a copy of the release from the client. Please feel free to direct any communications regarding this request to my professional e-mail: [redacted]<br><br>Thank you |
| Are you a member of the media?: | |
| Preferred Method to Receive Records: | Electronic via Records Center |

## Payment Information

## For Public Archive Use Only

## SB 302 Reporting

PII Released?: This field is not visible to customers.

Publish Request to Portal: No

***This will publish this request online and make it available to the public.***

## Message History

Date

On 1/17/2025 11:54:36 AM, Michelle Nader wrote:

Date

**Subject:** [Records Center] Parole and Probation :: B024732-091824
**Body:**

Nevada Department of Public Safety
Dedication Pride Service

RE: PUBLIC RECORDS REQUEST of September 18, 2024., Reference # B024732-091824.

Dear Allison Schmidt:

On September 18, 2024, the Nevada Department of Public Safety received your request for documents pursuant to Nevada' s Public Records Law.

Records Requested: "Hello, I am an attorney representing Travis Low ([redacted]) with regard to an ABA claim and possible Habeas petition. My email address is [redacted] I have requested From Officer Romnick Jacobs and Lieutenant Shannon Serena the following records and reiterate the request under the Nevada's Public Records Act:
1. All written notices of any hearing, meeting or any other proceeding that were provided to Travis Low from 8/21/2024 to present.
2.Any written notice provided to Travis Low regarding the meeting that took place between Low, Jacobs and an unidentified 3rd parole officer at CCDC - North Valley Complex on 9/5/24.
3. The badge number or other identifying information for the officer who accompanied officer Romnick jacobs to the meeting or proceeding with Travis Low at CCEC North Valley Complex on 9/5/24
4. Body worn camera footage for Romnick Jacobs for his on-duty shift on 9/5/24.
5. a Copy of any document presented by Parole and Probation to Low for signing from 8/22/24 to present, and, if applicable, the signed copy.
6. Notices of any scheduled Parole Proceeding relating to Travis Low.
7. Records indicating how Mr. Low's current expiration date has been calculated, including what credits have been applied.
8. The e-mail address of anyone at Parole and Probation who we may send Mr. Low's medical records for his Workers Comp Disability, so that he may be properly credited for work time for the time he was unable to work due to his disability resulting from an industrial injury.

I have included a copy of the release from the client. Please feel free to direct any communications regarding this request to my professional e-mail: [redacted]

Thank you"

Nevada Parole and Probation is sending additional responsive information in the attached letter, as it was discovered this request was not fulfilled completely. If you need additional information or have questions, please submit a new request.

Date

Please do not hesitate to contact us with any questions or concerns. Thank you.
Sincerely,

NPP Records
Parole and Probation
Nevada Department of Public Safety

Date

On 9/18/2024 2:11:25 PM, Michelle Nader wrote:

Date

**Subject:** [Records Center] Parole and Probation :: B024732-091824
**Body:**

Nevada Department of Public Safety
Dedication Pride Service

RE: PUBLIC RECORDS REQUEST of September 18, 2024., Reference # B024732-091824.

Dear Allison Schmidt:

On September 18, 2024, the Nevada Department of Public Safety received your request for documents pursuant to Nevada' s Public Records Law.

Records Requested: "Hello, I am an attorney representing Travis Low ([redacted]) with regard to an ABA claim and possible Habeas petition. My email address is [redacted] I have requested From Officer Romnick Jacobs and Lieutenant Shannon Serena the following records and reiterate the request under the Nevada's Public Records Act:
1. All written notices of any hearing, meeting or any other proceeding that were provided to Travis Low from 8/21/2024 to present.
2.Any written notice provided to Travis Low regarding the meeting that took place between Low, Jacobs and an unidentified 3rd parole officer at CCDC - North Valley Complex on 9/5/24.
3. The badge number or other identifying information for the officer who accompanied officer Romnick jacobs to the meeting or proceeding with Travis Low at CCEC North Valley Complex on 9/5/24
4. Body worn camera footage for Romnick Jacobs for his on-duty shift on 9/5/24.
5. a Copy of any document presented by Parole and Probation to Low for signing from 8/22/24 to present, and, if applicable, the signed copy.
6. Notices of any scheduled Parole Proceeding relating to Travis Low.
7. Records indicating how Mr. Low's current expiration date has been calculated, including what credits have been applied.
8. The e-mail address of anyone at Parole and Probation who we may send Mr. Low's medical records for his Workers Comp Disability, so that he may be properly credited for work time for the time he was unable to work due to his disability resulting from an industrial injury.

I have included a copy of the release from the client. Please feel free to direct any communications regarding this request to my professional e-mail: [redacted]

Thank you"

**This is a duplicate request to your previous request of B024669-091324. As stated previously we need your request on official Letterhead to proceed fulfilling that request.**

Date

Thank you.
Sincerely,

NPP Records

Parole and Probation
Nevada Department of Public Safety

Date

On 9/18/2024 1:54:58 PM, System Generated Message:
**Subject:** Parole and Probation :: B024732-091824
**Body:** Dear Allison Schmidt:

Thank you for your interest in public records with the Nevada Department of Public Safety. Your request has been received and will be processed in accordance to the Public Information Law. Your request was received in this office on 9/18/2024 and given the reference number B024732-091824 for tracking purposes.

Records Requested: *"Hello, I am an attorney representing Travis Low ([redacted] with regard to an ABA claim and possible Habeas petition. My email address is [redacted] I have requested From Officer Romnick Jacobs and Lieutenant Shannon Serena the following records and reiterate the request under the Nevada's Public Records Act: 1. All written notices of any hearing, meeting or any other proceeding that were provided to Travis Low from 8/21/2024 to present. 2.Any written notice provided to Travis Low regarding the meeting that took place between Low, Jacobs and an unidentified 3rd parole officer at CCDC - North Valley Complex on 9/5/24. 3. The badge number or other identifying information for the officer who accompanied officer Romnick jacobs to the meeting or proceeding with Travis Low at CCEC North Valley Complex on 9/5/24 4. Body worn camera footage for Romnick Jacobs for his on-duty shift on 9/5/24. 5. a Copy of any document presented by Parole and Probation to Low for signing from 8/22/24 to present, and, if applicable, the signed copy. 6. Notices of any scheduled Parole Proceeding relating to Travis Low. 7. Records indicating how Mr. Low's current expiration date has been calculated, including what credits have been applied. 8. The e-mail address of anyone at Parole and Probation who we may send Mr. Low's medical records for his Workers Comp Disability, so that he may be properly credited for work time for the time he was unable to work due to his disability resulting from an industrial injury. I have included a copy of the release from the client. Please feel free to direct any communications regarding this request to my professional e-mail.[redacted] Thank you"*

Your request will be forwarded to the relevant department to locate the information you seek. You will be contacted about the availability and/or provided with copies of the records in question.

You can monitor the progress of your request here: My Records Center.

Nevada Department of Public Safety

Nevada Department of
**Public Safety**
Parole and Probation

On 9/18/2024 1:54:57 PM, Allison Schmidt wrote:
Request Created on Public Portal

**Request Details**

| | |
|---|---|
| Reference No: | B024732-091824 |
| Create Date: | 9/18/2024 1:54 PM |
| Update Date: | 1/17/2025 11:44 AM |
| Completed/Closed: | Yes |
| Close Date: | 9/18/2024 2:09 PM |
| | |
| Status: | Duplicate Request |
| Priority: | Medium |
| Assigned Dept: | DPS - 652 Parole & Probation |
| Assigned Staff: | Michelle Nader |
| | |
| Customer Name: | Allison Schmidt |
| Email Address: | [redacted] |
| Phone: | |
| Group: | (Not Specified) |
| | |
| Source: | Web |

# Parole and Probation (#B031808-021026)

## Parole and Probation Details

| | |
|---|---|
| Is this request COVID-19 related?: | No |
| Describe the Record(s) Requested: | Requesting information the Parole and Probation Division as well as the Office of Professional Responsibility have on Stewart Handte. Requesting any and all information, documented and verified complaints, official reports, incident reports, emails, text messages and phone correspondences.<br>Emails from requestor are attached. |
| Are you a member of the media?: | No |
| Preferred Method to Receive Records: | Electronic via Records Center |

## Payment Information

## For Public Archive Use Only

## SB 302 Reporting

| | | |
|---|---|---|
| PII Released?: | No | This field is not visible to customers. |
| Publish Request to Portal: | No<br>***This will publish this request online and make it available to the public.*** | |

## Notes

| Note | Created | Modified |
|---|---|---|
| OPR stated that requested documents are deemed confidential under NAC 284.718. Responded to customer. Request is now closed. | 4/1/2026 11:41:00 AM by Melissa Sabatini | 4/1/2026 11:41:00 AM by Melissa Sabatini |
| NPP has fulfilled our portion. Uploaded and release to Mr. Handte. Transferring back to Melissa Sabatini | 3/31/2026 11:05:00 AM by Michaela Gillenwater | 3/31/2026 11:05:00 AM by Michaela Gillenwater |

| | | |
|---|---|---|
| received ID via Fax 3/31/2026 | 3/31/2026 8:21:00 AM by Michaela Gillenwater | 3/31/2026 8:21:00 AM by Michaela Gillenwater |
| Extended to 3/31/2026 per direction of Nicole Lubich- still working on gathering responsive documents | 3/17/2026 9:57:00 AM by Michaela Gillenwater | 3/17/2026 9:57:00 AM by Michaela Gillenwater |
| npp records This request came in by email. Once NPP has satisfied their portion of the request, please re-assign it to the Director's Office, Melissa Sabatini. I will work with OPR on their part. Please let me know if you have any questions. Thank you! | 2/10/2026 2:56:00 PM by Melissa Sabatini | 2/10/2026 2:56:00 PM by Melissa Sabatini |

**Message History**

Date

On 4/1/2026 11:49:30 AM, Melissa Sabatini wrote:
**Subject:** [Records Center] Parole and Probation :: B031808-021026

**Body:**

Nevada Department of Public Safety
Dedication Pride Service

RE: PUBLIC RECORDS REQUEST of February 10, 2026., Reference # B031808-021026.

Dear Stewart Handte:

Requested documents held by the Office of Professional Responsibility are deemed confidential pursuant to NAC 284.718. Thank you.

This request is now closed.

Sincerely,

Public Records Request Unit
Nevada Department of Public Safety

Date

On 3/31/2026 11:14:56 AM, Michaela Gillenwater wrote:
**Subject:** [Records Center] Parole and Probation :: B031808-021026
**Body:**

Nevada Department of
**Public Safety**
Dedication Pride Service

RE: PUBLIC RECORDS REQUEST of February 10, 2026., Reference # B031808-021026.

Dear Stewart Handte:

On February 10, 2026, the Nevada Department of Public Safety received your request for documents pursuant to Nevada' s Public Records Law.

Records Requested: "Requesting information the Parole and Probation Division as well as the Office of Professional Responsibility have on Stewart Handte. Requesting any and all information, documented and verified complaints, official reports, incident reports, emails, text messages and phone correspondences.
Emails from requestor are attached."

The Nevada Department of Public Safety, Division of Parole and Probation has fulfilled their portion of the request and has located responsive documents. Your responsive documents are available at My Records Center and attached to this email.

Please do not hesitate to contact me with any questions or concerns. Thank you.

Sincerely,

Public Records Request Unit
Nevada Department of Public Safety

Date

On 3/26/2026 8:37:36 AM, Michaela Gillenwater wrote:

Date

**Subject:** [Records Center] Parole and Probation :: B031808-021026
**Body:**

Nevada Department of
**Public Safety**
Dedication Pride Service

RE: PUBLIC RECORDS REQUEST of February 10, 2026., Reference # B031808-021026.

Dear Stewart Handte ,

This communication is in regards to the above mentioned Public Records Request, at this time the Nevada Department of Public Safety requires further clarification for your request.

"Requesting information the Parole and Probation Division as well as the Office of Professional Responsibility have on Stewart Handte. Requesting any and all information, documented and verified complaints, official reports, incident reports, emails, text messages and phone correspondences.
Emails from requestor are attached."

For the Nevada Department of Public Safety, Division of Parole and Probation to process your request, you must upload a copy of a valid driver' s license or valid government issued identification (ID) in the attachments. Without the copy of the valid ID, we cannot process your request. Please have the requested information available to us by 03/31/2026. If the information is not received by the date enclosed, your request will be closed.
You can provide clarification by responding to this e-mail or:

1. By going to My Records Center
2. Mailing in your response to:
   1445 Old Hot Springs Rd, Suite 104, Carson City, NV 89706
3. In person at the above mentioned address
4. Via fax at (775) 684-8144 ATTN: Public Records Officer

Thank you,

NPP Records
775-684-2600

Date

Parole and Probation
Nevada Department of Public Safety

On 3/17/2026 10:41:26 AM, Michaela Gillenwater wrote:
**Subject:** [Records Center] Parole and Probation :: B031808-021026
**Body:**

Nevada Department of
**Public Safety**
Dedication Pride Service

RE: PUBLIC RECORDS REQUEST of February 10, 2026., Reference # B031808-021026.

On February 10, 2026, the Nevada Department of Public Safety received your request for documents pursuant to Nevada' s Public Records Law.

Thank you for contacting the Department of Public Safety Nevada Parole and Probation Division (NPP). NPP is conducting a search and review of all records in our legal custody or control to determine if any responsive records exist. NPP is unable to complete this process and provide any responsive records within five business days.[1] NPP anticipates responding to this request by March 31, 2026.
Subsection (1) - [1] NRS 239.0107(1)(c)(1) (any governmental entity unable to make a record available within five business days must provide the requester with written notice and include the " earliest date and time after which the governmental entity reasonably believes the public book or record will be available" ).

Sincerely,

Public Records Request Unit
Nevada Department of Public Safety

Date

On 2/18/2026 1:28:12 PM, Sarah Entwistle wrote:
**Subject:** [Records Center] Parole and Probation :: B031808-021026
**Body:**

Nevada Department of
**Public Safety**
Dedication Pride Service

RE: PUBLIC RECORDS REQUEST of February 10, 2026., Reference # B031808-021026.

On February 10, 2026, the Nevada Department of Public Safety received your request for documents pursuant to Nevada' s Public Records Law.

Thank you for contacting the Department of Public Safety Nevada Parole and Probation Division (NPP). NPP is conducting a search and review of all records in our legal custody or control to determine if any responsive records exist. NPP is unable to complete this process and provide any responsive records within five business days.[1] NPP anticipates responding to this request by March 18th, 2026.

Subsection (1) - [1] NRS 239.0107(1)(c)(1) (any governmental entity unable to make a record available within five business days must provide the requester with written notice and include the " earliest date and time after which the governmental entity reasonably believes the public book or record will be available" ).

Sincerely,

Public Records Request Unit
Nevada Department of Public Safety

Sincerely,

Public Records Request Unit
Nevada Department of Public Safety

Date

On 2/10/2026 2:52:20 PM, System Generated Message:
**Subject:** Parole and Probation :: B031808-021026
**Body:** Dear Stewart Handte:

Thank you for your interest in public records with the Nevada Department of Public Safety. Your request has been received and will be processed in accordance to the Public Information Law. Your request was received in this office on 2/10/2026 and given the reference number B031808-021026 for tracking purposes.

Records Requested: *"Requesting information the Parole and Probation Division as well as the Office of Professional Responsibility have on Stewart Handte. Requesting any and all information, documented and verified complaints, official reports, incident reports, emails, text messages and phone correspondences. Emails from requestor are attached."*

Your request will be forwarded to the relevant department to locate the information you seek. You will be contacted about the availability and/or provided with copies of the records in question.

You can monitor the progress of your request here: My Records Center.

Nevada Department of Public Safety

Nevada Department of
**Public Safety**
Parole and Probation

On 2/10/2026 2:52:20 PM, Melissa Sabatini wrote:
Request was created by staff

## Request Details

| | |
|---|---|
| Reference No: | B031808-021026 |
| Created By: | Melissa Sabatini |
| Create Date: | 2/10/2026 2:52 PM |
| Update Date: | 4/1/2026 11:41 AM |

| | |
|---|---|
| Completed/Closed: | Yes |
| Close Date: | 4/1/2026 11:41 AM |
| Status: | Assigned |
| Priority: | Medium |
| Assigned Dept: | DPS - 650 Director's Office |
| Assigned Staff: | Melissa Sabatini |
| Customer Name: | Stewart Handte |
| Email Address: | [redacted] |
| Phone: | |
| Group: | (Not Specified) |
| Source: | Email |

# Parole and Probation (#B032647-033026)

**Parole and Probation Details**

| | |
|---|---|
| Is this request COVID-19 related?: | No |

Describe the Record(s) Requested:

Subject: Public Records Request – MOU Compliance Documentation (Fallon Paiute-Shoshone Tribe / NDPS Parole & Probation)

Dear Records Custodian,

Pursuant to NRS Chapter 239, I request copies of public records sufficient to show how the Nevada Division of Parole & Probation documents and implements compliance with the Memorandum of Understanding between the Division and the Fallon Paiute-Shoshone Tribe.

This request is distinct from prior requests and seeks general administrative records regarding MOU implementation and compliance practices, rather than records tied to any specific investigation or event. It is not limited by case number and does not seek investigative case files.

A copy of the Memorandum of Understanding is attached for reference. This request seeks records sufficient to show how the Division documents compliance with the notification, coordination, and authority limitations set forth in that agreement, including how those requirements are implemented in practice.

1. General MOU Compliance Documentation
Records sufficient to show how the Division documents compliance with MOU requirements, including but not limited to:

Notification to Fallon Paiute-Shoshone Tribal Police prior to entry onto tribal land
Identification or designation of officers authorized to conduct supervision activities on tribal land
Required coordination procedures between Division personnel and Tribal authorities

2. Record Systems and Documentation Practices
Records sufficient to identify:

The systems, logs, databases, or other record-keeping methods used to document MOU compliance (including but not limited to emails, call logs, dispatch records, reports, or internal tracking systems)
Any required forms, checklists, templates, or documentation protocols used when operating under the MOU
Any policies, manuals, or guidance documents describing how compliance is recorded or tracked

3. September 2024 Timeframe (Targeted Example of Implementation)
Without requesting investigative case files, records sufficient to show how MOU compliance is documented during Division activity on tribal land in or around September 2024, including but not limited to:

Any notification to Fallon Paiute-Shoshone Tribal Police
Any communication or coordination with Tribal authorities
Any documentation reflecting the basis for Division presence or supervision activity on tribal land

4. Custody / Detention Coordination Procedures

Records sufficient to show how the Division documents coordination with Fallon Paiute-Shoshone Tribal Police when a supervised individual is detained, searched, or arrested on tribal land, including:

Procedures, logs, or communication records reflecting such coordination
Any required documentation or reporting following such events

5. Format and Scope
This request includes records in any format or medium, including electronic records, emails, logs, reports, or other documentation maintained by the Division.

6. Timing / Metadata
Where such records exist, please include associated date/time metadata or transmission records reflecting when notifications, communications, or coordination occurred.

7. Absence of Records
If no responsive records exist for any category above, please provide written confirmation that no such records are maintained.

8. Withholding / Redactions
If any records are withheld or redacted, please cite the specific statutory basis under NRS 239.0107 and produce all reasonably segregable portions of responsive records.

9. Search Description
If records are not located or production is delayed, please identify:

The custodians, divisions, or units tasked with the search
The record systems or databases searched

10. Production Timeline
Pursuant to NRS 239.0107(1)(c), please provide the records at the earliest available time and begin rolling production as records become available.

I request production in electronic format where available.

Thank you for your time and assistance.

Sincerely,

Veronica Huerta-Lanza

Are you a member of the media?:

Preferred Method to Receive Records: Electronic via Records Center

## Payment Information

## For Public Archive Use Only

## SB 302 Reporting

PII Released?: This field is not visible to customers.

Publish Request to Portal: No

***This will publish this request online and make it available to the public.***

## Notes

| Note | Created | Modified |
|---|---|---|
| All responsive records were previously provided. Uploaded letterhead and sent email | 4/14/2026 9:47:00 AM by Michaela Gillenwater | 4/14/2026 9:47:00 AM by Michaela Gillenwater |
| Extending 45 days per direction of Nicole Lubich. Sent extension email 4/2 | 4/2/2026 12:05:00 PM by Michaela Gillenwater | 4/2/2026 12:11:00 PM by Michaela Gillenwater |

## Message History

Date

On 4/24/2026 10:50:55 AM, Michaela Gillenwater wrote:

Date

**Subject:** [Records Center] Parole and Probation :: B032647-033026
**Body:**

Nevada Department of Public Safety
Dedication Pride Service

RE: PUBLIC RECORDS REQUEST of March 30, 2026., Reference # B032647-033026.

Dear Veronica Huerta-Lanza:

On March 30, 2026, the Nevada Department of Public Safety received your request for documents pursuant to Nevada' s Public Records Law.

Records Requested: "Subject: Public Records Request – MOU Compliance Documentation (Fallon Paiute-Shoshone Tribe / NDPS Parole & Probation)

Dear Records Custodian,

Pursuant to NRS Chapter 239, I request copies of public records sufficient to show how the Nevada Division of Parole & Probation documents and implements compliance with the Memorandum of Understanding between the Division and the Fallon Paiute-Shoshone Tribe.

This request is distinct from prior requests and seeks general administrative records regarding MOU implementation and compliance practices, rather than records tied to any specific investigation or event. It is not limited by case number and does not seek investigative case files.

A copy of the Memorandum of Understanding is attached for reference. This request seeks records sufficient to show how the Division documents compliance with the notification, coordination, and authority limitations set forth in that agreement, including how those requirements are implemented in practice.

1. General MOU Compliance Documentation
Records sufficient to show how the Division documents compliance with MOU requirements, including but not limited to:

Notification to Fallon Paiute-Shoshone Tribal Police prior to entry onto tribal land
Identification or designation of officers authorized to conduct supervision activities on tribal land
Required coordination procedures between Division personnel and Tribal authorities

2. Record Systems and Documentation Practices

Date

Records sufficient to identify:

The systems, logs, databases, or other record-keeping methods used to document MOU compliance (including but not limited to emails, call logs, dispatch records, reports, or internal tracking systems)
Any required forms, checklists, templates, or documentation protocols used when operating under the MOU
Any policies, manuals, or guidance documents describing how compliance is recorded or tracked

3. September 2024 Timeframe (Targeted Example of Implementation)
Without requesting investigative case files, records sufficient to show how MOU compliance is documented during Division activity on tribal land in or around September 2024, including but not limited to:

Any notification to Fallon Paiute-Shoshone Tribal Police
Any communication or coordination with Tribal authorities
Any documentation reflecting the basis for Division presence or supervision activity on tribal land

4. Custody / Detention Coordination Procedures
Records sufficient to show how the Division documents coordination with Fallon Paiute-Shoshone Tribal Police when a supervised individual is detained, searched, or arrested on tribal land, including:

Procedures, logs, or communication records reflecting such coordination
Any required documentation or reporting following such events

5. Format and Scope
This request includes records in any format or medium, including electronic records, emails, logs, reports, or other documentation maintained by the Division.

6. Timing / Metadata
Where such records exist, please include associated date/time metadata or transmission records reflecting when notifications, communications, or coordination occurred.

7. Absence of Records
If no responsive records exist for any category above, please provide written confirmation that no such records are maintained.

8. Withholding / Redactions
If any records are withheld or redacted, please cite the specific statutory basis under NRS 239.0107 and produce all reasonably segregable portions of responsive records.

9. Search Description
If records are not located or production is delayed, please identify:

Date

The custodians, divisions, or units tasked with the search
The record systems or databases searched

10. Production Timeline
Pursuant to NRS 239.0107(1)(c), please provide the records at the earliest available time and begin rolling production as records become available.

I request production in electronic format where available.

Thank you for your time and assistance.

Sincerely,

Veronica Huerta-Lanza"

The Nevada Department of Public Safety, Division of Parole and Probation has sent you communication. Your communication is available at My Records Center
Sincerely,

Public Records Request Unit
Nevada Department of Public Safety

Date

On 4/14/2026 11:00:37 AM, Veronica Huerta-Lanza wrote:

Date

TO: "Nevada Department of Public Safety"[nevadadps@govqa.us]

Clarification and Complete Response Requested - Public Records Request B032647-033026

Dear Records Custodian,

I write regarding the Division's April 14, 2026 response to Public Records Request B032647-033026.

This request does not seek investigative or case-specific records, but rather records reflecting administrative compliance with the MOU, including how such compliance is documented in practice during Division
activity on tribal land.

The response does not clearly establish whether responsive records exist for each category of the request, nor whether all such records have been produced. The Division's statement that it conducted a "diligent
and reasonable search" and produced "all responsive records" does not resolve whether responsive records exist for each category or whether any such records were not identified or produced.

To ensure clarity and allow meaningful evaluation of the Division's response under NRS Chapter 239, please provide the following:

1. Existence of Records by Category

For each of the following categories, please state whether responsive records exist in the Division's custody or control:
Notification to Fallon Paiute-Shoshone Tribal Police prior to entry onto tribal landIdentification or designation of officers authorized to conduct supervision activities on tribal landCoordination procedures between Division personnel and Tribal authoritiesSystems, logs, databases, forms, checklists, templates, manuals, guidance, emails, call logs, dispatch records, reports, or internal tracking records
used to document MOU complianceRecords reflecting Division activity on tribal land in or around September 2024Communications or coordination with Tribal authorities concerning such activityDocumentation reflecting the basis for Division presence or supervision activity on tribal landProcedures, logs, or communications reflecting coordination when a supervised individual is detained, searched, or arrested on tribal land

For any category where no responsive records exist, please provide a clear written statement confirming that no such records are maintained.

2. Scope of Search

Your response indicates that searches were conducted in the Records Management System, email correspondence, and SharePoint.

Please identify:
The custodians whose records were searched; The divisions, units, sections, or field offices included in the search; The databases, shared drives, email accounts, archives, or other repositories searched; andWhether any custodians or repositories reasonably likely to contain responsive records were not searched, and if so, why.

Date

3. Production Confirmation

Please confirm whether the records produced constitute the complete universe of responsive records located.

If any responsive records were identified but not produced, please identify the specific basis for withholding or redaction consistent with NRS 239.0107.

4. Rolling Production

Please confirm that if additional responsive records are later identified, located, or recovered, they will be produced on a rolling basis without requiring a new request.

5. Final Clarification

Please confirm whether:

The Division has located and produced all responsive records for each category identified in the request; or
No responsive records exist for one or more categories.

This clarification is necessary to determine whether the request has been fully satisfied.

Thank you for your attention to this matter. I look forward to your response.

Sincerely,

Veronica Huerta-Lanza

From:
Nevada Department of Public Safety
Date: Tuesday, April 14, 2026 at 10:04AM
To: Veronica Huerta
Subject: [Records Center] Parole and Probation :: B032647-033026

Attachments:
B032647-033026_response.pdf

Date

On 4/14/2026 10:04:05 AM, Michaela Gillenwater wrote:

Date

**Subject:** [Records Center] Parole and Probation :: B032647-033026
**Body:**

Nevada Department of Public Safety
Dedication Pride Service

RE: PUBLIC RECORDS REQUEST of March 30, 2026., Reference # B032647-033026.

Dear Veronica Huerta-Lanza:

On March 30, 2026, the Nevada Department of Public Safety received your request for documents pursuant to Nevada' s Public Records Law.

Records Requested: "Subject: Public Records Request – MOU Compliance Documentation (Fallon Paiute-Shoshone Tribe / NDPS Parole & Probation)

Dear Records Custodian,

Pursuant to NRS Chapter 239, I request copies of public records sufficient to show how the Nevada Division of Parole & Probation documents and implements compliance with the Memorandum of Understanding between the Division and the Fallon Paiute-Shoshone Tribe.

This request is distinct from prior requests and seeks general administrative records regarding MOU implementation and compliance practices, rather than records tied to any specific investigation or event. It is not limited by case number and does not seek investigative case files.

A copy of the Memorandum of Understanding is attached for reference. This request seeks records sufficient to show how the Division documents compliance with the notification, coordination, and authority limitations set forth in that agreement, including how those requirements are implemented in practice.

1. General MOU Compliance Documentation
Records sufficient to show how the Division documents compliance with MOU requirements, including but not limited to:

Notification to Fallon Paiute-Shoshone Tribal Police prior to entry onto tribal land
Identification or designation of officers authorized to conduct supervision activities on tribal land
Required coordination procedures between Division personnel and Tribal authorities

2. Record Systems and Documentation Practices

Date

Records sufficient to identify:

The systems, logs, databases, or other record-keeping methods used to document MOU compliance (including but not limited to emails, call logs, dispatch records, reports, or internal tracking systems)
Any required forms, checklists, templates, or documentation protocols used when operating under the MOU
Any policies, manuals, or guidance documents describing how compliance is recorded or tracked

3. September 2024 Timeframe (Targeted Example of Implementation)
Without requesting investigative case files, records sufficient to show how MOU compliance is documented during Division activity on tribal land in or around September 2024, including but not limited to:

Any notification to Fallon Paiute-Shoshone Tribal Police
Any communication or coordination with Tribal authorities
Any documentation reflecting the basis for Division presence or supervision activity on tribal land

4. Custody / Detention Coordination Procedures
Records sufficient to show how the Division documents coordination with Fallon Paiute-Shoshone Tribal Police when a supervised individual is detained, searched, or arrested on tribal land, including:

Procedures, logs, or communication records reflecting such coordination
Any required documentation or reporting following such events

5. Format and Scope
This request includes records in any format or medium, including electronic records, emails, logs, reports, or other documentation maintained by the Division.

6. Timing / Metadata
Where such records exist, please include associated date/time metadata or transmission records reflecting when notifications, communications, or coordination occurred.

7. Absence of Records
If no responsive records exist for any category above, please provide written confirmation that no such records are maintained.

8. Withholding / Redactions
If any records are withheld or redacted, please cite the specific statutory basis under NRS 239.0107 and produce all reasonably segregable portions of responsive records.

9. Search Description
If records are not located or production is delayed, please identify:

Date

The custodians, divisions, or units tasked with the search
The record systems or databases searched

10. Production Timeline
Pursuant to NRS 239.0107(1)(c), please provide the records at the earliest available time and begin rolling production as records become available.

I request production in electronic format where available.

Thank you for your time and assistance.

Sincerely,

Veronica Huerta-Lanza"

The Nevada Department of Public Safety, Division of Parole and Probation has uploaded communication, available at My Records Center

Please do not hesitate to contact me with any questions or concerns. Thank you.

Sincerely,

Public Records Request Unit
Nevada Department of Public Safety

On 4/13/2026 9:08:48 PM, Veronica Huerta-Lanza wrote:
Dear Records Custodian, I am writing to follow up on my April 2, 2026 correspondence regarding Public Records Request B032647-033026. As of today, more than five business days have passed without a response. My prior communication requested clarification necessary to evaluate the Department's assertion that June 5, 2026 represents the earliest reasonable date for production under NRS 239.0107(1)(c), including identification of custodians, record systems searched, and whether any records are available for rolling production. The absence of any response prevents meaningful assessment of the stated timeline and raises concerns regarding compliance with statutory response requirements. Please provide the requested information and produce any available responsive records without further delay. If I do not receive a response, I will consider pursuing all available remedies under Nevada law, including relief under NRS 239.011. Sincerely, Veronica Huerta-Lanza

Date

On 4/2/2026 4:57:35 PM, Veronica Huerta-Lanza wrote:

Date

TO: "Nevada Department of Public Safety"[nevadadps@govqa.us]

Dear Records Custodian,

Thank you for your response regarding Public Records Request No. B032647-033026.

I acknowledge your stated anticipated production date of June 5, 2026. For purposes of clarity and to ensure an accurate understanding of the status of this request, I respectfully request additional information regarding how this timeframe represents the “earliest reasonable” date under NRS 239.0107(1)(c), particularly in light of the scope of records sought.

As stated in the original request, this inquiry is limited to general administrative and compliance-related records, such as policies, procedures, templates, and documentation practices, and expressly excludes investigative case files. It also includes a narrowly tailored request for records sufficient to show how such compliance is documented in practice, including during Division activity on tribal land in or around September 2024.

Given the nature of these records, which are typically maintained in centralized or routinely used systems (including communication logs, notifications, or coordination records), it is not apparent why a multi-month review period would be necessary to identify and produce at least a portion of responsive materials.

To better understand the scope of the search being conducted and the basis for the projected timeline, I request the following:

1. A brief explanation of the factors necessitating the extended timeline;
2. Identification of the custodians, divisions, or units tasked with locating responsive records;
3. Identification of the record systems, databases, or repositories being searched; and
4. Confirmation of whether any categories of responsive records, including policies, templates, or records reflecting implementation during the September 2024 timeframe, have been identified and are capable of being produced on a rolling basis.

To the extent responsive administrative records are maintained in a manner that permits partial production, I respectfully request that such records be produced on a rolling basis rather than withheld in full pending completion of review.

This request is made to ensure clarity regarding the scope of the search, including how compliance-related records are identified and maintained, and to facilitate efficient processing consistent with Nevada Public Records Law.

Thank you for your attention to this matter. I look forward to your response.

Sincerely,
Veronica Huerta-Lanza

From: Nevada Department of Public Safety
Sent: Monday, March 30, 2026 11:37:49 AM

Date

To: Veronica Huerta
Subject: Parole and Probation :: B032647-033026

Dear Veronica Huerta-Lanza:

Thank you for your interest in public records with the Nevada Department of Public Safety. Your request has been received and will be processed in accordance to the Public Information Law. Your request was received
in this office on 3/30/2026 and given the reference number B032647-033026 for tracking purposes.
Records Requested: "Subject: Public Records Request – MOU Compliance Documentation (Fallon Paiute-Shoshone Tribe / NDPS Parole & Probation)

Dear Records Custodian,

Pursuant to NRS Chapter 239, I request copies of public records sufficient to show how the Nevada Division of Parole & Probation documents and implements compliance with the Memorandum of Understanding between the Division and the Fallon Paiute-Shoshone Tribe.

This request is distinct from prior requests and seeks general administrative records regarding MOU implementation and compliance practices, rather than records tied to any specific investigation or event. It is not limited by case number and does not seek
investigative case files.

A copy of the Memorandum of Understanding is attached for reference. This request seeks records sufficient to show how the Division documents compliance with the notification, coordination, and authority limitations set forth in that agreement, including how
those requirements are implemented in practice.

1. General MOU Compliance Documentation

Records sufficient to show how the Division documents compliance with MOU requirements, including but not limited to:

Notification to Fallon Paiute-Shoshone Tribal Police prior to entry onto tribal land

Identification or designation of officers authorized to conduct supervision activities on tribal land

Date

Required coordination procedures between Division personnel and Tribal authorities

2. Record Systems and Documentation Practices

Records sufficient to identify:

The systems, logs, databases, or other record-keeping methods used to document MOU compliance (including but not limited to emails, call logs, dispatch records, reports, or internal tracking systems)

Any required forms, checklists, templates, or documentation protocols used when operating under the MOU

Any policies, manuals, or guidance documents describing how compliance is recorded or tracked

3. September 2024 Timeframe (Targeted Example of Implementation)

Without requesting investigative case files, records sufficient to show how MOU compliance is documented during Division activity on tribal land in or around September 2024, including but not limited to:

Any notification to Fallon Paiute-Shoshone Tribal Police

Any communication or coordination with Tribal authorities

Any documentation reflecting the basis for Division presence or supervision activity on tribal land

4. Custody / Detention Coordination Procedures

Records sufficient to show how the Division documents coordination with Fallon Paiute-Shoshone Tribal Police when a supervised individual is detained, searched, or arrested on tribal land, including:

Procedures, logs, or communication records reflecting such coordination

Any required documentation or reporting following such events

Date

5. Format and Scope

This request includes records in any format or medium, including electronic records, emails, logs, reports, or other documentation maintained by the Division.

6. Timing / Metadata

Where such records exist, please include associated date/time metadata or transmission records reflecting when notifications, communications, or coordination occurred.

7. Absence of Records

If no responsive records exist for any category above, please provide written confirmation that no such records are maintained.

8. Withholding / Redactions

If any records are withheld or redacted, please cite the specific statutory basis under NRS 239.0107 and produce all reasonably segregable portions of responsive records.

9. Search Description

If records are not located or production is delayed, please identify:

The custodians, divisions, or units tasked with the search

The record systems or databases searched

10. Production Timeline

Pursuant to NRS 239.0107(1)(c), please provide the records at the earliest available time and begin rolling production as records become available.

Date

I request production in electronic format where available.

Thank you for your time and assistance.

Sincerely,

Veronica Huerta-Lanza"

Your request will be forwarded to the relevant department to locate the information you seek. You will be contacted about the availability and/or provided with copies of the records in question.
You can monitor the progress of your request here: My Records Center.
Nevada Department of Public Safety

Date

On 4/2/2026 12:18:37 PM, Michaela Gillenwater wrote:
**Subject:** [Records Center] Parole and Probation :: B032647-033026
**Body:**

Nevada Department of
Public Safety
Dedication Pride Service

RE: PUBLIC RECORDS REQUEST of March 30, 2026., Reference # B032647-033026.

On March 30, 2026, the Nevada Department of Public Safety received your request for documents pursuant to Nevada' s Public Records Law.

Thank you for contacting the Department of Public Safety Nevada Parole and Probation Division (NPP). NPP is conducting a search and review of all records in our legal custody or control to determine if any responsive records exist. NPP is unable to complete this process and provide any responsive records within five business days.[1] NPP anticipates responding to this request by June 5th 2026.
Subsection (1) - [1] NRS 239.0107(1)(c)(1) (any governmental entity unable to make a record available within five business days must provide the requester with written notice and include the " earliest date and time after which the governmental entity reasonably believes the public book or record will be available" ).

Sincerely,

Public Records Request Unit
Nevada Department of Public Safety

Date

On 3/30/2026 11:34:02 AM, System Generated Message:

Date

**Subject:** Parole and Probation :: B032647-033026
**Body:** Dear Veronica Huerta-Lanza:

Thank you for your interest in public records with the Nevada Department of Public Safety. Your request has been received and will be processed in accordance to the Public Information Law. Your request was received in this office on 3/30/2026 and given the reference number B032647-033026 for tracking purposes.

Records Requested: *"Subject: Public Records Request – MOU Compliance Documentation (Fallon Paiute-Shoshone Tribe / NDPS Parole & Probation)*

*Dear Records Custodian,*

*Pursuant to NRS Chapter 239, I request copies of public records sufficient to show how the Nevada Division of Parole & Probation documents and implements compliance with the Memorandum of Understanding between the Division and the Fallon Paiute-Shoshone Tribe.*

*This request is distinct from prior requests and seeks general administrative records regarding MOU implementation and compliance practices, rather than records tied to any specific investigation or event. It is not limited by case number and does not seek investigative case files.*

*A copy of the Memorandum of Understanding is attached for reference. This request seeks records sufficient to show how the Division documents compliance with the notification, coordination, and authority limitations set forth in that agreement, including how those requirements are implemented in practice.*

*1. General MOU Compliance Documentation*
*Records sufficient to show how the Division documents compliance with MOU requirements, including but not limited to:*

*Notification to Fallon Paiute-Shoshone Tribal Police prior to entry onto tribal land*
*Identification or designation of officers authorized to conduct supervision activities on tribal land*
*Required coordination procedures between Division personnel and Tribal authorities*

*2. Record Systems and Documentation Practices*
*Records sufficient to identify:*

*The systems, logs, databases, or other record-keeping methods used to document MOU compliance (including but not limited to emails, call logs, dispatch records, reports, or internal tracking systems)*
*Any required forms, checklists, templates, or documentation protocols used when operating under the MOU*
*Any policies, manuals, or guidance documents describing how compliance is recorded or tracked*

*3. September 2024 Timeframe (Targeted Example of Implementation)*
*Without requesting investigative case files, records sufficient to show how MOU compliance is documented during Division activity on tribal land in or around September 2024, including but not limited to:*

Date

*Any notification to Fallon Paiute-Shoshone Tribal Police*
*Any communication or coordination with Tribal authorities*
*Any documentation reflecting the basis for Division presence or supervision activity on tribal land*

*4. Custody / Detention Coordination Procedures*
*Records sufficient to show how the Division documents coordination with Fallon Paiute-Shoshone Tribal Police when a supervised individual is detained, searched, or arrested on tribal land, including:*

*Procedures, logs, or communication records reflecting such coordination*
*Any required documentation or reporting following such events*

*5. Format and Scope*
*This request includes records in any format or medium, including electronic records, emails, logs, reports, or other documentation maintained by the Division.*

*6. Timing / Metadata*
*Where such records exist, please include associated date/time metadata or transmission records reflecting when notifications, communications, or coordination occurred.*

*7. Absence of Records*
*If no responsive records exist for any category above, please provide written confirmation that no such records are maintained.*

*8. Withholding / Redactions*
*If any records are withheld or redacted, please cite the specific statutory basis under NRS 239.0107 and produce all reasonably segregable portions of responsive records.*

*9. Search Description*
*If records are not located or production is delayed, please identify:*

*The custodians, divisions, or units tasked with the search*
*The record systems or databases searched*

*10. Production Timeline*
*Pursuant to NRS 239.0107(1)(c), please provide the records at the earliest available time and begin rolling production as records become available.*

*I request production in electronic format where available.*

*Thank you for your time and assistance.*

*Sincerely,*

Date

*Veronica Huerta-Lanza"*

Your request will be forwarded to the relevant department to locate the information you seek. You will be contacted about the availability and/or provided with copies of the records in question.

You can monitor the progress of your request here: My Records Center.

Nevada Department of Public Safety

Nevada Department of
**Public Safety**
Parole and Probation

On 3/30/2026 11:33:59 AM, Veronica Huerta-Lanza wrote:
Request Created on Public Portal

## Request Details

| | |
|---|---|
| Reference No: | B032647-033026 |
| Create Date: | 3/30/2026 11:33 AM |
| Update Date: | 4/24/2026 10:40 AM |
| Completed/Closed: | Yes |
| Close Date: | 4/14/2026 9:55 AM |
| Status: | Full Release |
| Priority: | Medium |
| Assigned Dept: | DPS - 652 Parole & Probation |
| Assigned Staff: | Michaela Gillenwater |

| | |
|---|---|
| Customer Name: | Veronica Huerta-Lanza |
| Email Address: | [redacted] |
| Phone: | [redacted] |
| Group: | (Not Specified) |
| Source: | Web |

# Parole and Probation (#B031751-020626)

**Parole and Probation Details**

| | |
|---|---|
| Is this request COVID-19 related?: | No |

Describe the Record(s) Requested:

Dear Public Records Request Unit,

Pursuant to Nevada Revised Statutes Chapter 239, I respectfully request copies of public records maintained by Nevada Parole & Probation sufficient to identify the legal authority and procedural basis under which Parole & Probation personnel transferred custody or control of Cameron Tom-Ray Allen's cellular phone(s) to non-Parole law-enforcement personnel during the September 2024 parole contact.

This request is submitted as a new public records request and is related to, but distinct from, prior requests concerning parole supervision activity. This request seeks records reflecting authority, approval, and procedure for the transfer of custody of seized property and does not seek investigative case files or the contents of any device.

Date Range

September 1, 2024 through September 30, 2024.

Records Requested (if they exist)

1. Authority to Transfer Custody

Any written authorization, supervisory approval, policy provision, directive, or delegation permitting Parole & Probation personnel to transfer seized property or digital devices to a task force officer or other criminal investigative unit.

2. Purpose of Transfer

Any documentation identifying the purpose or justification for transferring custody of the cellular phone, including but not limited to parole compliance, evidence safekeeping, forensic analysis, or criminal investigation.

3. Custodial Status After Transfer

Any records reflecting whether Parole & Probation retained custody, entered into joint custody, or fully relinquished custody of the cellular phone following the transfer.

4. Policies and Training

Any policies, protocols, manuals, or training materials governing evidence or property handoff from Parole & Probation to law-enforcement agencies.

This request is limited to records created, received, or maintained by Nevada Parole & Probation. It does not seek investigative reports, charging documents, or the contents of any digital device.

If any responsive records are withheld or redacted, please provide all reasonably segregable non-exempt portions and identify the specific statutory basis for each withholding or redaction.

If no responsive records exist for any category above, please confirm that fact in writing.

Please also identify the unit(s) or custodian(s) responsible for maintaining the requested records.

Thank you for your time and assistance.

Respectfully,
Veronica Huerta-Lanza

| | |
|---|---|
| Are you a member of the media?: | |
| Preferred Method to Receive Records: | Electronic via Records Center |

## Payment Information

## For Public Archive Use Only

## SB 302 Reporting

| | |
|---|---|
| PII Released?: | This field is not visible to customers. |
| Publish Request to Portal: | No |

***This will publish this request online and make it available to the public.***

## Notes

| Note | Created | Modified |
|---|---|---|
| Found requested documents in lexipol and iNET, and IDS. Certified, uploaded to GovQA. Uploaded letterhead to GovQA. Let requestor know request is closed. Closed. | 3/5/2026 3:10:00 PM by Joshua Doddridge | 3/5/2026 3:10:00 PM by Joshua Doddridge |

## Message History

Date

On 3/12/2026 8:39:16 AM, Joshua Doddridge wrote:

Date

**Subject:** [Records Center] Parole and Probation :: B031751-020626
**Body:**

Nevada Department of Public Safety
Dedication Pride Service

RE: PUBLIC RECORDS REQUEST of February 06, 2026., Reference # B031751-020626.

Dear Veronica Huerta-Lanza:

On February 06, 2026, the Nevada Department of Public Safety received your request for documents pursuant to Nevada' s Public Records Law.

Records Requested: "Dear Public Records Request Unit,

Pursuant to Nevada Revised Statutes Chapter 239, I respectfully request copies of public records maintained by Nevada Parole & Probation sufficient to identify the legal authority and procedural basis under which Parole & Probation personnel transferred custody or control of Cameron Tom-Ray Allen' s cellular phone(s) to non-Parole law-enforcement personnel during the September 2024 parole contact.

This request is submitted as a new public records request and is related to, but distinct from, prior requests concerning parole supervision activity. This request seeks records reflecting authority, approval, and procedure for the transfer of custody of seized property and does not seek investigative case files or the contents of any device.

Date Range

September 1, 2024 through September 30, 2024.

Records Requested (if they exist)

1. Authority to Transfer Custody

Any written authorization, supervisory approval, policy provision, directive, or delegation permitting Parole & Probation personnel to transfer seized property or digital devices to a task force officer or other criminal investigative unit.

2. Purpose of Transfer

Date

Any documentation identifying the purpose or justification for transferring custody of the cellular phone, including but not limited to parole compliance, evidence safekeeping, forensic analysis, or criminal investigation.

3. Custodial Status After Transfer

Any records reflecting whether Parole & Probation retained custody, entered into joint custody, or fully relinquished custody of the cellular phone following the transfer.

4. Policies and Training

Any policies, protocols, manuals, or training materials governing evidence or property handoff from Parole & Probation to law-enforcement agencies.

This request is limited to records created, received, or maintained by Nevada Parole & Probation. It does not seek investigative reports, charging documents, or the contents of any digital device.

If any responsive records are withheld or redacted, please provide all reasonably segregable non-exempt portions and identify the specific statutory basis for each withholding or redaction.

If no responsive records exist for any category above, please confirm that fact in writing.

Please also identify the unit(s) or custodian(s) responsible for maintaining the requested records.

Thank you for your time and assistance.

Respectfully,
Veronica Huerta-Lanza"

The Nevada Department of Public Safety, Division of Parole and Probation has uploaded communication, available at My Records Center.
Sincerely,

Public Records Request Unit
Nevada Department of Public Safety

Date

On 3/12/2026 12:39:53 AM, Veronica Huerta-Lanza wrote:

Date

TO: "Nevada Department of Public Safety"[nevadadps@govqa.us]

Dear Public Records Request Unit,
Thank you for the documents recently provided in response to Public Records Request I031745-020626. I appreciate the Department's efforts to locate responsive records.
Upon review, the production appears limited to the following three records:NDPS Property Report – Case No. 24I000395 reflecting two cellular devicesNevada Division of Investigation digital forensics chain-of-custody report for a Gray iPhone 15 Pro Max (Lab Case No. DI-2024-00232)Nevada Division of Investigation digital forensics chain-of-custody report for a Black TCL A509DL (Lab Case No. DI-2024-00232)
These records indicate that the devices were entered into the NDI digital forensics laboratory system on December 10, 2024 and later released to the Carson City DPS Evidence Vault on April 21, 2025.
However, the records produced do not appear to include documentation relating to the initial seizure, intake, booking, or transfer of the devices prior to their entry into the NDI laboratory system, which were categories expressly
requested in the February 6, 2026 request.
Because the chain-of-custody records provided begin with the devices being entered into the NDI laboratory system on December 10, 2024, there appears to be a period of custody prior to that date for which no responsive documentation
has been produced. Evidence handling procedures ordinarily require documentation reflecting the seizure, booking, and transfer of property into an evidence management system prior to forensic submission. Accordingly, I am seeking any records documenting those
earlier custody events if such records exist.
To ensure the request has been fully searched and processed, please clarify whether additional responsive records exist relating to:the initial seizure or recovery of the devicesevidence/property booking or intake documentationevidence submission or forensic intake forms associated with Lab Case DI-2024-00232inter-agency transfer or receipt documentation reflecting custody between NCNTF, NDPS, NDI, or other participating unitsthe return or execution documentation associated with the New River Township Justice Court search warrant referenced in the request
If such records exist but have not yet been produced, please advise when they will be made available.
If no such records exist, please confirm that no seizure documentation, evidence intake records, forensic submission forms, or transfer documentation were created or maintained prior to the devices being entered into the NDI laboratory
system on December 10, 2024.
Additionally, to the extent these records are maintained within electronic systems, please produce responsive records in their native electronic format where maintained, including any associated metadata fields reflecting creation
date, entry date, modification date, user account, and system-generated timestamps. This request includes metadata or system entries maintained within the Department's evidence management system (EvidenceOnQ® or similar systems) and digital forensic submission
systems associated with Lab Case DI-2024-00232.
To the extent responsive records are maintained within an evidence management or digital forensic system, please also produce any system-generated audit logs, entry records, or transaction histories reflecting the creation, entry,
modification, transfer, or movement of evidence items DIU-700 and DIU-701 within the Department's evidence management platform.
In addition, please produce any digital forensic extraction activity logs or processing reports associated with Lab Case DI-2024-00232, including system-generated records reflecting when the devices were first connected to forensic
tools, powered on, accessed, or processed during the extraction workflow.

Date

If responsive records exist in a database or evidence management system but have not been exported as standalone documents, please produce the system record entries, database exports, or system reports reflecting those records.

If any responsive records are being withheld, please identify the specific statutory basis for withholding pursuant to NRS Chapter 239, including the exemption relied upon for each withheld record.
Finally, please identify the records custodians, divisions, systems, or databases searched in response to this request.
Thank you for your continued attention to this matter.
Sincerely,

Veronica Huerta-Lanza

From:
Nevada Department of Public Safety
Date: Thursday, March 5, 2026 at 3:23PM
To: Veronica Huerta
Subject: [Records Center] Parole and Probation :: B031751-020626

Date

On 3/6/2026 1:55:26 PM, Veronica Huerta-Lanza wrote:
TO: "Nevada Department of Public Safety"[nevadadps@govqa.us]

Dear Records Unit,
Thank you for your March 5, 2026 response to my public records request (Reference No. B031751-020626). I appreciate the production of the responsive policies, directive materials, the violation report dated
09/12/2024, the parole agreement, and the Memorandum of Understanding referenced in your letter.
For purposes of clarifying the record, I would respectfully request confirmation of the following:
Your response indicates that the Division has produced all responsive records and that
no further responsive records exist.
My request specifically sought records sufficient to identify thelegal authority and procedural basis under which Parole & Probation personnel transferred custody or control of Cameron Tom-Ray Allen's cellular phone(s) to non-Parole law-enforcement personnel during the September
2024 parole contact.
Based on the materials produced, I would appreciate written confirmation as to whether the Division maintains
any of the following records:Any written authorization, supervisory approval, or directive specifically authorizing the transfer of Mr. Allen's cellular phone(s) to another law-enforcement agency or task
force officer.Any property transfer form, evidence handoff documentation, or chain-of-custody record reflecting the transfer of the cellular phone(s).Any documentation identifying the
agency or officer who received custody of the device following the parole contact.Any records reflecting whether Parole & Probation retained custody, shared custody, or relinquished custody of the device following the transfer.
If no records exist for any of the above categories, please confirm that fact in writing so that I may direct any further requests to the appropriate agency.
Thank you again for your time and assistance.
Sincerely,

Veronica Huerta-Lanza

From:
Nevada Department of Public Safety
Date: Thursday, March 5, 2026 at 3:23PM
To: Veronica Huerta
Subject: [Records Center] Parole and Probation :: B031751-020626

Date

On 3/5/2026 3:23:07 PM, Joshua Doddridge wrote:

Date

**Subject:** [Records Center] Parole and Probation :: B031751-020626
**Body:**

Nevada Department of Public Safety
Dedication Pride Service

RE: PUBLIC RECORDS REQUEST of February 06, 2026., Reference # B031751-020626.

Dear Veronica Huerta-Lanza:

On February 06, 2026, the Nevada Department of Public Safety received your request for documents pursuant to Nevada' s Public Records Law.

Records Requested: "Dear Public Records Request Unit,

Pursuant to Nevada Revised Statutes Chapter 239, I respectfully request copies of public records maintained by Nevada Parole & Probation sufficient to identify the legal authority and procedural basis under which Parole & Probation personnel transferred custody or control of Cameron Tom-Ray Allen' s cellular phone(s) to non-Parole law-enforcement personnel during the September 2024 parole contact.

This request is submitted as a new public records request and is related to, but distinct from, prior requests concerning parole supervision activity. This request seeks records reflecting authority, approval, and procedure for the transfer of custody of seized property and does not seek investigative case files or the contents of any device.

Date Range

September 1, 2024 through September 30, 2024.

Records Requested (if they exist)

1. Authority to Transfer Custody

Any written authorization, supervisory approval, policy provision, directive, or delegation permitting Parole & Probation personnel to transfer seized property or digital devices to a task force officer or other criminal investigative unit.

2. Purpose of Transfer

Date

Any documentation identifying the purpose or justification for transferring custody of the cellular phone, including but not limited to parole compliance, evidence safekeeping, forensic analysis, or criminal investigation.

3. Custodial Status After Transfer

Any records reflecting whether Parole & Probation retained custody, entered into joint custody, or fully relinquished custody of the cellular phone following the transfer.

4. Policies and Training

Any policies, protocols, manuals, or training materials governing evidence or property handoff from Parole & Probation to law-enforcement agencies.

This request is limited to records created, received, or maintained by Nevada Parole & Probation. It does not seek investigative reports, charging documents, or the contents of any digital device.

If any responsive records are withheld or redacted, please provide all reasonably segregable non-exempt portions and identify the specific statutory basis for each withholding or redaction.

If no responsive records exist for any category above, please confirm that fact in writing.

Please also identify the unit(s) or custodian(s) responsible for maintaining the requested records.

Thank you for your time and assistance.

Respectfully,
Veronica Huerta-Lanza"

The Nevada Department of Public Safety has uploaded communication and documents, available at My Records Center. This request is now closed. Please do not hesitate to contact us with any questions or concerns. Thank you.

Sincerely,

Public Records Request Unit
Nevada Department of Public Safety

Date

On 2/12/2026 8:59:50 AM, Joshua Doddridge wrote:
**Subject:** [Records Center] Parole and Probation :: B031751-020626
**Body:**

Nevada Department of Public Safety
Dedication Pride Service

RE: PUBLIC RECORDS REQUEST of February 06, 2026., Reference # B031751-020626.

On February 06, 2026, the Nevada Department of Public Safety received your request for documents pursuant to Nevada' s Public Records Law.

Thank you for contacting the Department of Public Safety Nevada Parole and Probation Division (NPP). NPP is conducting a search and review of all records in our legal custody or control to determine if any responsive records exist. NPP is unable to complete this process and provide any responsive records within five business days.[1] NPP anticipates responding to this request by March 6th, 2026.
Subsection (1) - [1] NRS 239.0107(1)(c)(1) (any governmental entity unable to make a record available within five business days must provide the requester with written notice and include the " earliest date and time after which the governmental entity reasonably believes the public book or record will be available" ).

Sincerely,

Public Records Request Unit
Nevada Department of Public Safety

Date

On 2/6/2026 6:00:09 PM, System Generated Message:

Date

**Subject:** Parole and Probation :: B031751-020626
**Body:** Dear Veronica Huerta-Lanza:

Thank you for your interest in public records with the Nevada Department of Public Safety. Your request has been received and will be processed in accordance to the Public Information Law. Your request was received in this office on 2/6/2026 and given the reference number B031751-020626 for tracking purposes.

Records Requested: *"Dear Public Records Request Unit,*

*Pursuant to Nevada Revised Statutes Chapter 239, I respectfully request copies of public records maintained by Nevada Parole & Probation sufficient to identify the legal authority and procedural basis under which Parole & Probation personnel transferred custody or control of Cameron Tom-Ray Allen's cellular phone(s) to non-Parole law-enforcement personnel during the September 2024 parole contact.*

*This request is submitted as a new public records request and is related to, but distinct from, prior requests concerning parole supervision activity. This request seeks records reflecting authority, approval, and procedure for the transfer of custody of seized property and does not seek investigative case files or the contents of any device.*

*Date Range*

*September 1, 2024 through September 30, 2024.*

*Records Requested (if they exist)*

*1. Authority to Transfer Custody*

*Any written authorization, supervisory approval, policy provision, directive, or delegation permitting Parole & Probation personnel to transfer seized property or digital devices to a task force officer or other criminal investigative unit.*

*2. Purpose of Transfer*

*Any documentation identifying the purpose or justification for transferring custody of the cellular phone, including but not limited to parole compliance, evidence safekeeping, forensic analysis, or criminal investigation.*

*3. Custodial Status After Transfer*

*Any records reflecting whether Parole & Probation retained custody, entered into joint custody, or fully relinquished custody of the cellular phone following the transfer.*

*4. Policies and Training*

Date

*Any policies, protocols, manuals, or training materials governing evidence or property handoff from Parole & Probation to law-enforcement agencies.*

*This request is limited to records created, received, or maintained by Nevada Parole & Probation. It does not seek investigative reports, charging documents, or the contents of any digital device.*

*If any responsive records are withheld or redacted, please provide all reasonably segregable non-exempt portions and identify the specific statutory basis for each withholding or redaction.*

*If no responsive records exist for any category above, please confirm that fact in writing.*

*Please also identify the unit(s) or custodian(s) responsible for maintaining the requested records.*

*Thank you for your time and assistance.*

*Respectfully,*
*Veronica Huerta-Lanza"*

Your request will be forwarded to the relevant department to locate the information you seek. You will be contacted about the availability and/or provided with copies of the records in question.

You can monitor the progress of your request here: My Records Center.

Nevada Department of Public Safety

Nevada Department of
**Public Safety**
Parole and Probation

On 2/6/2026 6:00:07 PM, Veronica Huerta-Lanza wrote:
Request Created on Public Portal

**Request Details**

| | |
|---|---|
| Reference No: | B031751-020626 |
| Create Date: | 2/6/2026 6:00 PM |
| Update Date: | 3/12/2026 8:17 AM |
| Completed/Closed: | Yes |
| Close Date: | 3/5/2026 3:11 PM |
| Status: | Full Release |
| Priority: | Medium |
| Assigned Dept: | DPS - 652 Parole & Probation |
| Assigned Staff: | Joshua Doddridge |
| Customer Name: | Veronica Huerta-Lanza |
| Email Address: | [redacted] |
| Phone: | [redacted] |
| Group: | (Not Specified) |
| Source: | Web |

**From:** Melissa Sabatini
**To:** AGGeneralCounsel
**Subject:** PRTF Survey - DPS Director"s Office
**Date:** Wednesday, October 7, 2026 9:59:08 AM
**Attachments:** image001.png

---

Good morning,

Below is an example of a public records request our division considers overbroad or unduly burdensome:

1. Documents showing total number of Nevada Department of Public Safety ("NDPS") employees currently enrolled in the Public Employer Retirement System ("PERS") employer-employee pay plan versus the employer pay plan.

2. Any existing report, dashboard, summary, or data extract the NDPS or its payroll/HR office already maintains that shows PERS pay-plan enrollment counts or percentages.

3. The same counts broken down by job classification or title, and work location/institution.

4. If no single report exists, results of a query of the NDPS's existing payroll system identifying, for each active employee, the PERS pay-plan code or flag associated with that employee.

5. All current and prior (past four years) written payroll policies, procedures, manuals, or instructions governing how overtime compensation is calculated for NDPS employees, including any that address the Fair Labor Standards Act ("FLSA") "regular rate" of pay and/or comparable state requirements.

6. Any policy, procedure, memorandum, or instruction addressing how PERS contributions are treated in computing the overtime regular rate, including any distinction between employer-employee pay plan and employer pay plan employees.

7. Any document describing how the FLSA work-period/§ 207(k) overtime standard for correctional/law enforcement personnel is applied at NDPS, including the length of the work period and the overtime threshold used.

8. Pay-stubs, pay-calculation worksheets, spreadsheets, or system configuration documentation showing the regular-rate and overtime computation for (a) ten representative employer-employee pay plan employees and (b) ten representative employer pay plan employees — for example, redacted sample pay stubs or earnings statements for these comparable employees for the same pay period.

9. Any documentation of how the payroll system codes or handles the salary reduction / "in lieu of" adjustment for employer pay plan employees (the counterbalance required by NRS 286.421), and how that adjusted salary figure feeds into overtime.

10. Any existing document, report, dashboard, summary, or data extract which shows the difference in salary for comparable employees on employer-employee pay plan vs. the employer pay plan — for example, reports showing employees that would be entitled to the same pay if they were on the same

PERS plan, but instead showing the difference in the pay they receive as a result of choosing the employee-employer pay plan versus the employer pay plan.

11. Any audits, internal reviews, corrective actions, complaints, grievances, or legal opinions (past four years) concerning overtime calculation for employees, particularly any addressing differences between the two pay plans or FLSA regular-rate compliance.

12. Any communications with PERS, the Nevada Division of Human Resource Management, or the State Controller's Office concerning how PERS pay-plan election affects overtime pay.

13. All plan election forms used by NDPS (or provided to NDPS employees) for choosing between the employer employee plan and employer pay plan, for each version in use over the past four years.

14. All written materials given to employees explaining the choice between the two plans — including new-hire orientation packets, benefits guides, summary sheets, FAQs, memos, and PERS informational handouts distributed by the NDPS.

15. Any document that describes or discloses the effect of the plan election on take-home pay, salary, or overtime — specifically, any statement telling employees that electing the employer-pay plan involves a salary reduction or foregone salary increase, or that it could affect the regular rate used for overtime.

16. All communications (emails, memos, bulletins, notices) sent to employees or bargaining units regarding the pay plan election and its consequences for compensation or overtime, for the past four years.

17. Documents identifying the specific job categories at NDPS which are overtime eligible vs. overtime exempt.

Please produce all documents, records and/or data in electronic format. Please produce on a rolling basis rather than waiting until the entire request is complete.

Thank you,
Melissa

**Melissa Sabatini**
ASO I | DPS Contract Manager
Department of Public Safety
Nevada State Police | Director's Office
555 Wright Way, Carson City, NV 89711
T: 775-684-4593 | F: 775-684-4809 | E: msabatini@dps.state.nv.us
Find Careers at www.NevadaStatePolice.com

**From:** Ashley Kemp
**To:** Ashley Kemp
**Subject:** [EXTERNAL] Watts - 07/05/2025 (239)
**Date:** Wednesday, September 30, 2026 5:14:17 PM

---

**From:** Jesse Watts, Sheriff [redacted]
**Sent:** Saturday, July 5, 2025 11:49:15 AM
**To:** Kathy Bowling <KBowling@EurekaCountyNV.gov>; Jesse Watts [redacted]
**Subject:** [EXTERNAL] Watts - 07/05/2025 (239)

CAUTION: This Message originated outside your organization.

---

Dear Clerk Bowling, Board Clerk;
Misty Rowley, Chief Information Officer, Board of County Commissioners, Chairman McKay

**Under NRS 239.010, "all public books and public records of a governmental entity must be open at all times during office hours to inspection by any person." The requested records are public in nature and must be made available unless a specific statutory exemption applies.**

I am demanding an opportunity to inspect or obtain copies of public records that **contains the following:**

**All emails in the email addressed to or from jjwatts@eurekacountynv.gov from January 7th, 2019 to April 1st, 2025.**

**All written notes, letters, correspondence, Emails to**

**and from Sheriff Jesse J. Watts from January 7th, 2019 to April 1st, 2025 to All Board Of County Commissioners (Julian "JJ" Goicoechea, Fred Etchegary, Michael Sharkozy, Richard McKay, Marty Plaskett, Michael Schonewald)**
**Eureka County Clerk (Lisa Hoehne, Kathy Bacon-Bowling)**
**Staff of Eureka County Clerk's Office from the dates listed.**

**All written notes, letters, memos, correspondence, Emails to and from Theodore Beutel or his past or current employees to Board of County Commissioners with any mention of Jesse Watts, Sheriff Jesse Watts, Sheriff Watts, The Sheriff, Sheriff's Office, Office of the Sheriff, or any resonable reference to the Duly Elected Sheriff, Jesse James Watts.**

**All written notes, letters, correspondence, Emails to and from Lisa Hoehne to Board of County Commissioners with any mention of Jesse Watts, Sheriff Jesse Watts, Sheriff Watts, The Sheriff, Sheriff's Office, Office of the Sheriff, or any resonable reference to the Duly Elected Sheriff, Jesse James Watts.**

**All written notes, letters, correspondence, Emails to and from Kathy Bacon-Bowling, to or from Board of**

**County Commissioners with any mention of Jesse Watts, Sheriff Jesse Watts, Sheriff Watts, The Sheriff, Sheriff's Office, Office of the Sheriff, or any resonable reference to the Duly Elected Sheriff, Jesse James Watts.**

**All written notes, letters, correspondence, Emails to and from Kimberly Todd to Board of County Commissioners with any mention of Jesse Watts, Sheriff Jesse Watts, Sheriff Watts, The Sheriff, Sheriff's Office, Office of the Sheriff, or any resonable reference to the Duly Elected Sheriff, Jesse James Watts.**

**All written notes, letters, correspondence, Emails to and from Past and Current Comptroller staff member with any mention of Jesse Watts, Sheriff Jesse Watts, Sheriff Watts, The Sheriff, Sheriff's Office, Office of the Sheriff, or any resonable reference to the Duly Elected Sheriff, Jesse James Watts.**

**All written notes, letters, correspondence, emails to and from Heidi Whimple to Board of County Commissioners with any mention of Jesse Watts, Sheriff Jesse Watts, Sheriff Watts, The Sheriff, Sheriff's Office, Office of the Sheriff, or any resonable reference to the Duly Elected Sheriff, Jesse James Watts.**

**All written notes, letters, correspondence, Emails to and from Tasha Dunlap to Board of County Commissioners with any mention of Jesse Watts, Sheriff Jesse Watts, Sheriff Watts, The Sheriff, Sheriff's Office, Office of the Sheriff, or any resonable reference to the Duly Elected Sheriff, Jesse James Watts.**

**All written notes, letters, correspondence, Emails to and from BOCC members (listed above) to any Eureka County Employee with any mention of Jesse Watts, Sheriff Jesse Watts, Sheriff Watts, The Sheriff, Sheriff's Office, Office of the Sheriff, or any resonable reference to the Duly Elected Sheriff, Jesse James Watts.**

**All written notes, letters, correspondence, Emails to and from the elected official, past and current employees of the District Attorneys Office, to any Eureka County Employee with any mention of Jesse Watts, Sheriff Jesse Watts, Sheriff Watts, The Sheriff, Sheriff's Office, Office of the Sheriff, or any resonable reference to the Duly Elected Sheriff, Jesse James Watts from January 7, 2019 to current.**

**All written notes, letters, correspondence, Emails to and from the elected official, past and current**

**employees of the District Attorneys Office, to POOL/PACT with any mention of Jesse Watts, Sheriff Jesse Watts, Sheriff Watts, The Sheriff, Sheriff's Office, Office of the Sheriff, or any resonable reference to the Duly Elected Sheriff, Jesse James Watts from January 7, 2019 to current.**

**All written notes, letters, correspondence, Emails to and from the elected official, past and current employees of the District Attorneys Office, to Spencer Investigations with any mention of Jesse Watts, Sheriff Jesse Watts, Sheriff Watts, The Sheriff, Sheriff's Office, Office of the Sheriff, or any resonable reference to the Duly Elected Sheriff, Jesse James Watts from January 7, 2019 to current.**

**A copy of all previous Public Records Requests submitted by, or about Sheriff Jesse Watts.**

**All emails on any server owned, leased or accessed or controlled by Eureka County, Nevada a political subdivision of the State of Nevada.**

**All expenditures, contracts, and back up material for the Eureka County District Attorney's Office for Investigations, contract services and any employee complaint expense from January 1, 2018 to current.**

**All expenditures, contracts, and back up material for the Eureka County Human Resource Department for Investigations, contract services and any employee complaint expense from January 1, 2018 to current.**

**All expenditures, contracts, and back up material for the Eureka County Board of County Commissioners for Investigations, contract services and any employee complaint expense from January 1, 2018 to current.**

**All civil legal action settlements involving Eureka County as a party from January 1, 2018 to current.**

**All audio media recordings of BOCC Meetings from January 1 2018, to current.**

**All BOCC meeting agenda requests from January 7, 2019 to current.**

**All BOCC draft meeting agendas from January 7, 2019 to current.**

**All approved BOCC meeting agendas from January 7, 2019 to current.**

**All draft meeting minutes from January 7, 2019 to current**

**All approved meeting minutes from January 7, 2019 to current.**

**I request a waiver of all fees in that the disclosure of the requested information is in the public interest, the requests have been previously ignored or deliberately and unlawfully unanswered. These documents will contribute significantly to the public's understanding of the unlawful government actions taken by members of Eureka County Government, Board of County Commissioners, District Attorney, Human Resources against myself, and multiple members of the Eureka County Sheriff's Office.**

*This information is not being sought for commercial purposes.*

If access to the records I am requesting will take longer than a 'reasonable' amount of time, please contact me with information about when I might expect copies or the **ability to inspect** the requested records.

**If you believe any portion of these records is exempt, please:**

- **Identify each specific exemption under the law,**

- 

**Provide a written justification for the denial, and**

- 

**Provide redacted versions of the documents where lawfully appropriate.**

## Notice of Non-Compliance

**This request follows a previous public records request made by me, which remains unfulfilled. Continued noncompliance with NRS Chapter 239 may result in legal action, including a petition to the district court to compel disclosure, along with a request for attorney's fees and costs under NRS 239.011(2).**

***Jesse Watts***
Sheriff-Coroner
Eureka County, NV
P: 7[redacted]
E: [redacted]

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The sender of  his email is a member of the Davies Group of companies, the parent of which is Davies Group Limited (registered in the UK Company Number 6479822).

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**From:** Ashley Kemp
**To:** Ashley Kemp
**Subject:** RE: [EXTERNAL] Watts - 07/04/2025
**Date:** Wednesday, September 30, 2026 5:11:46 PM

---

**From:** Jesse Watts, Sheriff [redacted]
**Sent:** Friday, July 4, 2025 1:21:05 AM
**To:** Tasha Dunlap <TDunlap@EurekaCountyNV.gov>; Rich McKay <RMcKay@EurekaCountyNV.gov>
**Subject:** [EXTERNAL] Watts - 07/04/2025

CAUTION: This Message originated outside your organization.

---

**Tasha Dunlap, Human Resources Director**
**Rich McKay, Chairman**
**Board of County Commissioners**
**Via email**

**RE: FORMAL DEMAND TO PRODUCE COMPLETE INVESTIGATION FILES PURSUANT TO NRS CHAPTER 289 AND NEVADA PUBLIC RECORDS ACT**

**To Ms. Dunlap and Chairman McKay:**

**Pursuant to NRS Chapter 289 (Peace Officer Bill of Rights) and NRS Chapter 239 (Nevada Public Records Act), this letter constitutes a formal demand for the immediate production of all complete investigative files involving or referencing myself, Jesse J. Watts, in any capacity during my tenure as Sheriff of Eureka County (January 7, 2019-April 1st, 2025).**

**Pursuant to NRS 289.080, NRS 289.020 through NRS 289.120, and all applicable provisions of Nevada law guaranteeing the rights of peace officers under investigation, I hereby formally demand the immediate production of all investigative records, reports, notes, audio/video recordings, complaints, witness statements, interview transcripts, communications, and any and all materials associated with any and all internal or external investigations conducted involving myself, including but not limited to administrative, criminal, or disciplinary matters.**

**Under NRS 289.060, a peace officer is entitled to access to all reports and evidence prior to any interrogation or hearing, and under NRS 289.080, any peace officer under investigation has the right to a fair and transparent process. The failure to provide the complete investigation file violates my due process rights and protections under state law.**

**Accordingly, I demand that the following materials be provided without delay and no**

**later than 10 Business Days.**

1.

The **complete unredacted investigative file for all internal or external complaints involving me.**

2.

Any and all documents, memoranda, and communication records (emails, texts, digital logs) relevant to said investigations.

3.

A list of all individuals interviewed, with dates and summaries of statements.

4.

Copies of any **recordings, transcripts, or logs from interviews, interrogations, or hearings.**

5.

A complete accounting of any findings, conclusions, or proposed actions taken as a result of the investigation.

Failure to produce these records will constitute a violation of **NRS 289.080 and may result in legal action, including a motion for injunctive relief and/or a civil rights claim under 42 U.S.C. § 1983, if rights under the Peace Officer Bill of Rights and due process protections are not honored.**

**Please consider this letter a formal and legal demand. If your office believes certain documents are privileged or exempt, you are required to identify each withheld document and the legal basis for such withholding under Nevada law.**

***Jesse Watts***
Sheriff-Coroner (Retired)
Eureka County, NV
P: [redacted]

## CONFIDENTIALITY NOTICE:

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The sender of his email is a member of the Davies Group of companies, the parent of which is Davies Group Limited (registered in the UK Company Number 6479822).

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# Public Records Request No. 2

R. Clay Hendrix
[redacted]

Date: June 6, 2025

To:
City Clerk's Office
City of Fallon
55 W. Williams Avenue
Fallon, NV 89406

Dear Records Custodian,

Pursuant to the Nevada Public Records Act, NRS Chapter 239, I hereby request public records relating to the involvement of the City of Fallon in the recruitment, selection, and appointment process for the Churchill County Manager. This request is submitted in the public interest to ensure transparency and accountability in the administration of public roles that affect both County and City governance.

I request that the following public records be produced, regardless of the device, format, or platform used (including emails, text messages, handwritten notes, memos, calendar invites, and any communications via personal or non-City accounts if used for public business):

## 1. Communications Regarding the Hiring Process

All communications between any City of Fallon official, employee, or elected representative and:
- Members of the Churchill County Commission;
- The Churchill County Manager or Assistant County Manager;
- The Churchill County Human Resources Department;
- The Churchill County District Attorney's Office;
- Members of the screening or interview panel;

…that pertain to the recruitment, ranking, interview, evaluation, or appointment of the Churchill County Manager.

## 2. Records Involving City Officials' Participation

All documents and communications reflecting any participation by City of Fallon officials in:
- Discussions or meetings regarding the hiring process;
- Providing input, recommendations, or references for any applicant;
- Coordination with County officials about the selection of candidates for interviews.

## 3. Records Supporting Public Statements or Endorsements

All records supporting or relating to any public comment, endorsement, or recommendation made by any City of Fallon official regarding:
- The selection of a particular applicant;

- The process used to evaluate or rank applicants;
- The assertion that the process was appropriate or consistent with regional practices.

### 4. Use of Private Devices or Non-City Platforms

All records responsive to this request that may have been created or transmitted via personal cell phones, personal email accounts, or other non-City-issued platforms used to conduct or discuss public business. This includes deleted or recovered communications where applicable.

### 5. Whistleblower or Ethics Concerns

Any communications or records referencing:
- Complaints, concerns, or warnings related to the fairness, legality, or influence over the County Manager hiring process;
- Whistleblower disclosures, public inquiries, or internal deliberations relating to the conduct of the hiring process or any individuals involved.

### 6. Communications with the District Attorney and County Officials

All communications between City of Fallon officials and:
- The Churchill County District Attorney's Office;
- The current or former County Manager;
- The Assistant County Manager;
...concerning the legal sufficiency, fairness, public perception, or policy implications of the County Manager selection process.

### Inclusion of Elected Officials

All responsive records must include communications to or from elected members of the Fallon City Council and the Mayor, even if conducted through personal devices or accounts used in the course of public business.

### Additional Notes

Please ensure that this request is circulated to all departments, employees, and officials who may have relevant records. If any portion of this request is denied, please provide a written explanation citing the specific legal authority relied upon, as required under NRS 239.0107.

Thank you for your assistance and timely response. Please confirm receipt of this request.

Sincerely,

[redacted]

R. Clay Hendrix

F | G FLYNN | GIUDICI

KEN TEDFORD
MAR 16 2021
MAYOR'S OFFICE

Daniel Giudici
[redacted]

March 14, 2022

***Via Certified Mail, Return Receipt -***

City of Fallon
Mayor Ken Tedford
55 W. Williams Ave.
Fallon, NV 89406

**Re: Public Records Request Pursuant to NRS Section 239.010**

Dear Mayor Tedford,

In accordance with the Nevada Open Records Act § 239, *et seq.*, we are hereby requesting copies of the following public records:

Any and all records, communications, e-mails, text messages, correspondence, letters, phone call logs (including cell phones), cell phone text message logs, text messages, imessages, blackberry messages, memorandums, recommendations, agendas, minutes, notes (handwritten or typed), instant messages, chat transcripts, chat records, chat logs, decisions, applications, and any other documents that reference, discuss, contemplate, mention, and/or refer in any way to:

- Nathan Van Treese,
- Van Treese,
- Stephen McNeal,
- Wayne de Geere III,
- MM R & D LLC,
- Green Cross Farmacy, LLC,
- Green Cross Farmacy,
- Green Cross,
- Farmacy,
- 40 East Center Street, Suite 14
- 510 West Williams Avenue
- Cannabis Establishment ID D098,
- Cannabis Establishment ID P138,
- Cannabis Establishment ID P139,

- Cannabis Establishment ID C209,
- Cannabis Establishment ID C208,
- Cannabis,
- Marijuana,
- Recreational cannabis,
- Recreational marijuana,
- Medicinal cannabis,
- Medicinal marijuana,
- Marijuana cultivation,
- Marijuana distribution,
- Retail marijuana,
- Retail cannabis,
- Non-medical marijuana,
- Dispensary,
- Recreational dispensary,
- Medical dispensary,
- Recreational license,
- Medicinal license,
- Cannabis dispensary Fallon,
- Assembly Bill 341 (enrolled 6/3/21),
- Assembly Bill 533 (enrolled 6/12/19),
- Senate Bill 374 (enrolled 5/26/17),
- Bill No. 780 (amending Fallon Municipal Code),
- Ordinance No. 761

from 2014 to the date of this letter that were created, prepared, sent, received, managed, drafted, reviewed, referenced, and/or written by any member of the Fallon City Council, specifically including but not limited to:

- Mayor Ken Tedford,
- Karla Kent,
- James Richardson,
- Kelly Frost,
- Robert Erquiaga,
- Michael Mackedon,
- Robert "Bob" Erickson,
- Michael O'Neill,
- Kevin Gehman,
- Gary Cordes,
- Leonard Mackedon,
- Elsie Lee,
- Brian Byrd,
- Adrian Noreiga,
- Jane Moon,

- Valerie Swirczek,
- Nathan Strong.

We request that the searches conducted by the City of Fallon encompass any electronically stored information that may be stored or located in any of the following:

- Internal servers,
- Internal computers,
- Personal servers,
- Personal computers,
- Personal cell phones,
- City cell phones,
- Internal cloud servers,
- External cloud servers,
- Personal cloud servers, and/or
- Any other forum that may harbor, retain, store, and/or provide access to the above-requested public records.

This request is made in accordance with NRS 239.0105(2)(b), as it is relevant to an investigation in anticipation of litigation. *See* attached Declaration.

To the extent any or all of this request is denied, please cite each specific legal exemption you rely on in support of your refusal to provide the requested public records.

Should you have any questions, please feel free to contact our office.

Sincerely,

[redacted]

Daniel Giudici

Encl.

## DECLARATION OF DANIEL GIUDICI

I, Daniel Giudici, declare under penalty of perjury as follows:

1. I am attorney licensed to practice law in the State of Nevada under License No. 15228.

2. I am an owner of Flynn Giudici, PLLC, a law firm licensed to do business in the State of Nevada.

3. I have personal knowledge of the facts stated herein, except for those stated upon information and belief, and as to those, I believe them to be true.

4. This Declaration is in lieu of an Affidavit pursuant to NRS 53.045.

5. I hereby affirm and declare that the public records request sent to the City of Fallon, a copy of which is attached hereto as Exhibit 1, is relevant to an investigation in anticipation of litigation pursuant to NRS 239.0105(2)(b).

I declare under penalty of perjury under the law of the State of Nevada that the foregoing statements are true and correct.

DATED this 14th day of March, 2022.

By: [redacted]
Daniel Giudici, Esq.

R. Clay Hendrix
[redacted]
Date: August ~~7,~~ 2025

City of Fallon
55 West Williams Avenue
Fallon, NV 89406

RE: Public Records Request – Emails and Text Messages of the Mayor of Fallon (Last Three Years)

To Whom It May Concern:

Pursuant to the Nevada Public Records Act, NRS Chapter 239, I respectfully request copies of any and all emails and text messages sent or received by the Mayor of Fallon over the last three (3) years.

This request includes any and all communications, regardless of topic, between August 1, 2022, and August 1, 2025. Please include:

1. Emails and text messages between the Mayor and any City of Fallon officials, employees, or contractors;
2. Emails and text messages between the Mayor and any external parties, including but not limited to members of the public, county officials, or private citizens;
3. Any such communications stored on city servers, devices, archived systems, or backup systems within the control of the City of Fallon.

Please produce these communications in native electronic format (e.g., .pst, .eml, .pdf for emails; .txt, .csv, or screenshot images for text messages) where possible, and include any attachments or linked content. If metadata is available and retrievable, please include it as well.

If the scope or volume of this request requires clarification or narrowing, I am happy to confer to facilitate timely compliance. However, please preserve all potentially responsive records while we do so.

If any records are withheld in full or in part, please provide a written explanation identifying the legal basis for such withholding as required by NRS 239.0107(1)(d). Redactions should be narrowly tailored and the remainder of the document produced.

I respectfully request a response within five business days, as required by NRS 239.0107(1).

Please contact me at the information above if you have any questions or require clarification.

Sincerely,

[redacted]
R. Clay Hendrix

Outlook

## FW: HAL Form Submission Notification

**From** Public Records Request <GCBPRR@gcb.nv.gov>
**Date** Mon 2/23/2026 11:04 AM
**To** Tiller, Sean A. <satiller@gcb.nv.gov>
**Cc** NGCB Administration - RecordsResearch - CC <RecordsResearchCC@gcb.nv.gov>

Good morning,

Please see the following request.

Thank you.

**Kind Regards**
**Ayla Chance**
**Administrative Assistant II**
**Records and Research**
**Administration Division**
**Nevada Gaming Control Board**
**Phone: (775) 684-7730**
**achance@gcb.nv.gov**

**This message, together with any attachment(s), is intended only for the addressee(s) and may contain information that is privileged and confidential. The intended addressee(s) shall not further disseminate this message, together with any attachments, unless authorized to do so. If the reader of the message is not the intended recipient or an authorized representative of the intended recipient, I did not intend to waive and do not waive any privilege or the confidentiality of the message and any attachment(s), and you are hereby notified that any dissemination of this communication is strictly prohibited. If you receive this communication in error, please notify me immediately by email and delete the message and any attachment(s) from your computer and network, as well as any hard copies created therefrom.**

**From:** hal@admin.nv.gov <hal@admin.nv.gov>
**Sent:** Monday, February 23, 2026 10:10 AM
**To:** Public Records Request <GCBPRR@gcb.nv.gov>
**Subject:** HAL Form Submission Notification

A new form has beeen submitted.

Gaming - Public Records Request
To update the form please visit: https://hal.nv.gov/submitted/249720User's entries follow

# Public Records Request

**Please do not include any personal information such as social security numbers, driver's license numbers, bank information, credit or debit card information, medical account information, etc., when submitting this form. Refer to NRS 603A.040 for more information about what is considered personal information.**

Fields marked with an asterisk (* Req) are required fields.

**Full Name: * Req**
Andrew Hackett

**Organization:**
Cogency Global Inc.

**Email Address: * Req**
[redacted]

**Phone: * Req**
[redacted]

**Address: * Req**
[redacted]

**Records Required: (Select One) * Req**
» **Electronic Copies** (Selected)
Inspection (in Person)
Paper Copies

**Description of Records Requested (Please be specific and include as much detail as possible) * Req**
February 23, 2026

VIA ONLINE SUBMISSION

Nevada Gaming Control Board
Public Records Officer
1919 College Parkway
Carson City, NV 89706
Telephone: (775) 684 7700
Email: RecordsResearchCC@gcb.nv.gov

Re: Nevada Public Records Act Request to Nevada Gaming Control Board

To Public Records Request Coordinator:

Pursuant to the Nevada Public Records Act, Nev. Rev. Stat. § 239.001 et seq., Cogency Global Inc. ("Cogency") hereby request copies of records in the possession of the Nevada Gaming Control Board. The records we seek include all documents and communications in the control or custody of the Nevada Gaming Control Board and/or its current and former members, appointees, employees, officers, attorneys, staff, and consultants (collectively, the "Nevada Gaming Control Board") that are responsive to the following requests, whether stored in hard copy, electronically, or in any other medium. Specifically, we seek all communications, including but not limited to meeting invitations, call logs, transcripts, voicemails, electronic mail, text messages, or messages on platforms like Slack, Teams, WhatsApp, or Signal (collectively, "Communications"), and all documents, including but not limited to analyses, guidance, memoranda, notes, agendas, preparation materials, briefing materials, summaries, and other records (collectively, "Documents"), created or revised between December 1, 2024 through the present, unless a different time period is provided, that relate to, describe, evidence, reference, or constitute ("Concerning") the subjects below.

The term "Prediction Market" includes any and all designated contract markets, derivatives clearing organizations, introducing brokers, and futures commission merchants (each as defined in 17 C.F.R. § 1.3) that list or are permitted to list for trading, facilitate the trading of, and/or clear event contracts, and related entities, including but not limited to Aristotle Exchange DCM, Inc. d/b/a PredictIt; Aristotle Exchange DCO, Inc.; Bitnomial Clearinghouse, LLC; Bitnomial Exchange, LLC; Cboe Clear US, LLC; Cboe Digital Exchange, LLC; Coinbase Derivatives, LLC; Coinbase Financial Markets, Inc.; DraftKings, Inc.; FanDuel Prediction Markets LLC; ForecastEx LLC d/b/a Interactive Brokers; GAIN Capital Group LLC d/b/a FOREX.com; Gemini Titan, LLC d/b/a Gemini; GUS III LLC d/b/a DraftKings Predictions; Kalshi Inc.; Kalshi Klear LLC; KalshiEx LLC; LedgerX LLC d/b/a MIAX Derivatives Exchange or MIAXdx; NADEX d/b/a Crypto.com Derivatives North America; Ninjatrader Clearing LLC d/b/a Kraken Derivatives US; Nodal Clear, LLC; North American Derivatives Exchange, Inc., d/b/a Crypto.com; Performance Predictions II, LLC d/b/a PrizePicks; Plus500US Financial Services LLC; QC Clearing LLC d/b/a Polymarket Clearing; QCX LLC d/b/a Polymarket US; Railbird Exchange, LLC; Robinhood Derivatives, LLC; Rothera Exchange and Clearing LLC; Sleeper Markets LLC; UDM LLC d/b/a Underdog; and Webull Financial LLC.

Specifically, Cogency requests copies of:

1. All Documents or Communications Concerning event contracts or one or more Prediction Markets, including but not limited to:

a. Documents and Communications Concerning whether event contracts or any Prediction Market fall within the scope of Nevada gaming laws, including but not limited to the definitions for "game" (NRS 463.0152), "sports pool" (NRS 463.160), and "wager" (NRS 463.01962).

b. Documents and Communications Concerning the decision to issue a cease-and-desist to, take an enforcement action against, or file a lawsuit naming any Prediction Market.

c. Documents and Communications Concerning the decision to issue Notice to Licensees #2025-77 dated October 15, 2025 with the subject "Sports Event Contracts are Wagers."

d. Documents and Communications Concerning the decision to issue Notice to Licensees #2025-90 dated November 12, 2025 with the subject "Flutter Entertainment, FanDuel Sportsbooks, and DraftKings Update."

e. Documents and Communications Concerning the decision to issue Notice to Licensees #2025-100 dated November 25, 2025 with the subject "KalshiEx and Robinhood Update."

f. Documents and Communications Concerning the decision to issue Notice to Licensees #2026-04 dated January 16, 2026 with the subject “Industry Guidance for Online Gaming Products.”

g. Documents and Communications Concerning the preparation of Nevada Gaming Control Board Chairman Mike Dreitzer’s remarks at the State Bar of Nevada’s annual Gaming Law Conference on December 4, 2025.

2. All applications to operate in Nevada from a Prediction Market.

3. All contracts, memoranda of understanding, or agreements between the Nevada Gaming Control Board and the Nevada Gaming Commission and one or more Prediction Markets.

4. All Communications with American Gaming Association members, including the Nevada Resort Association, or Sports Betting Alliance members, Concerning event contracts or one or more Prediction Markets or the January 12, 2026 letter to Congress from the American Gaming Association and Indian Gaming Association.

5. All Documents and Communications Concerning projections, analysis, or assessment of expected or actual tax revenue, state budgets, or other fiscal impact related to event contracts or one or more Prediction Markets.

6. All Communications Concerning event contracts or one or more Prediction Markets with one or more of the following:

a. Boyd Gaming Corporation, Caesars Entertainment, Inc., Las Vegas Sands, MGM Resorts Inte

# 1.

# REQUEST from CM 07/05 11:52am

To the Humboldt County Public Records Officer / County Clerk,

Pursuant to the Nevada Public Records Act (NRS Chapter 239), I am writing to request access to and certified electronic copies of public records maintained by Humboldt County regarding the $5.9 million in federal American Rescue Plan Act (ARPA) funds utilized for groundwater rights retirement, as referenced in the recent Drake Rose & Associates fiscal audit.

Specifically, I am requesting the following records generated, received, or held between January 1, 2024, and the date of this request:

1. Title and Settlement Records: All closing statements, ALTA settlement sheets, escrow instructions, and disbursement ledgers from any private title company or escrow agent utilized to distribute the $5.9 million in ARPA funds for water rights purchases.
2. Chain of Custody and Financial Ledger: All internal county accounting entries, wire transfers, or unrecorded vouchers mapping the direct flow of federal funds from the county or federal accounts to the title company or subrecipients.
3. Transferor and Transferee Valuations: All contracts, deeds, and purchase agreements identifying the names of all sellers (transferors) of the groundwater rights, the specific basins/parcels involved, and the per-acre-foot price paid to each seller.
4. Procurement and Exemption Records: All documentation, board approvals, or internal memoranda justifying the bypass of open competition requirements for these federal funds, as flagged in the audit.
5. McDermitt GID Documentation: All contracts, wire transfers, and internal communications regarding the $101,794 pass-through to the McDermitt General Improvement District without a Unique Entity ID (UEI) number.

Per NRS 239.0107, you are required to respond to this request within five (5) business days. If this request is denied in whole or in part, please cite the specific statutory exemption justifying the withholding of each document. If there are fees associated with copying or scanning these electronic files, please notify me before fulfilling the request.

Thank you for your prompt cooperation in this matter of significant public interest.

Sincerely,

Cody Maltzman

[redacted]

# RESPONSE from WN 07/06 4:45pm

Hello,

I am in receipt of your Public Records Request dated 07/05/2026. I am happy to provide the following documentation available to Humboldt County as requested. I felt inclined to provide clarifying information that I believe is pertinent to further support your request and the information provided.

1. **Title and Settlement Records:** All closing statements, ALTA settlement sheets, escrow instructions, and disbursement ledgers from any private title company or escrow agent utilized to distribute the $5.9 million in ARPA funds for water rights purchases.

   Attached are all of the records in which Humboldt County has record of which may pertain to request for title and settlement records. Humboldt County is only the fiscal agent of the Humboldt River Basin Water Authority and does not retain the records of the HRBWA.

   Draw 1 3.pdf
   Draw 2 3.pdf
   Draw 3 3.pdf
   Draw 4 3.pdf
   Draw 5 3.pdf
   Draw 6 3.pdf
   Draw 7 3.pdf
   Draw 7 4.pdf

2. **Chain of Custody and Financial Ledger:** All internal county accounting entries, wire transfers, or unrecorded vouchers mapping the direct flow of federal funds from the county or federal accounts to the title company or subrecipients

The audit finding resulted from the fact that the State issued payment for the groundwater rights directly to the title company rather than remitting the funds to Humboldt County for disbursement.

Because the County never received or processed the payment, the transaction was not initially recorded in the County's financial system, and therefore there is no transfer of funds, voucher, or related procurement documentation that exists within County records.

To correct this, the County subsequently recorded the transaction through an adjusting journal entry to ensure proper financial reporting. This correction is reflected through "Adjusting Journal Entries JE #60" on pages 8 and 15 of the attachment.

1. AUDITORS ADJUSTING ENTRIES FY25.pdf

3. **Transferor and Transferee Valuations:** All contracts, deeds, and purchase agreements identifying the names of all sellers (transferors) of the groundwater rights, the specific basins/parcels involved, and the per-acre-foot price paid to each seller

See request #1. Humboldt County is only the fiscal agent of the Humboldt River Basin Water Authority and does not retain the records of the HRBWA.

4. **Procurement and Exemption Records:** All documentation, board approvals, or internal memoranda justifying the bypass of open competition requirements for these federal funds, as flagged in the audit.

The purchase of water rights with federal funds is not subject to open competition requirements, because it is considered a real property acquisition, not a procurement activity, and therefore the federal competitive procurement rules in 2 CFR 200.317–200.327 as well as Nevada Revised Statute governing competitive solicitation (NRS 332.115) do not apply. Therefore, there is no "documentation, board approvals, or internal memoranda justifying the bypass of open competition requirements for these federal funds" as the purchase of water rights related to these funds are not subject to open competition.

The bypass of open competition requirements as you are referencing as "flagged in the audit" i.e. *Finding 2025-008 ARPA Coronavirus State and Local Recover Funds, ALN 21.027 Procurement, Suspension, and Debarment* pertains to separate ARPA funding which is being utilized to fund the Grass Valley Nitrate Mitigation Project. The engineer which was initially retained to provide services for the project was not competitively bid and as a result this is a finding that will continue until the

project is completed. Again, this finding is not related to the ARPA funding provided for the ground water rights retirement program.

5. **McDermitt GID Documentation:** All contracts, wire transfers, and internal communications regarding the $101,794 pass-through to the McDermitt General Improvement District without a Unique Entity ID (UEI) number.

   The Grass Valley Mitigation Project received federal funding from the state via ARPA 00844. These ARPA funds were designated to address the nitrate issues present in the grass valley area. An amendment was approved to also replace water meters across the county's water systems.

   The Humboldt County Board of Commissioners governs the Gold Country water system, the Star City water system, and the McDermitt General Improvement District which includes the McDermitt Water fund and the McDermitt Sewer fund.

   Therefore, the amendment to ARPA 00844 allowed the county to replace meters within the McDermitt water system.

   Bids were received and awarded to Four-Point engineering who replaced meters in both the Gold Country Water System and the McDermitt General improvement district.

   Once the work was completed by Four Point the initial invoice was paid for out of the County General Fund's ARPA 00844 expense account. It was later determined that this expenditure should have been split between the Gold Country Water Fund and the McDermitt General Improvement District.

   An accounting entry was performed to record the expenditure in the proper fund. This included $101,794 in meter replacements for the McDermitt Water System.

   Subsequently, the county was reimbursed for these expenditures under the grant and the respective revenue received as reimbursement for the meter replacements was deposited into the proper fund. This included $101,794 which was deposited as revenue received to the McDermitt Water fund.

   Per subrecipient monitoring guidelines the County did not provided notice to the Governing Board of the McDermitt Water fund which is the Humboldt County Board of Commissioners that the funds were being received. Which is a procedure that should have been followed to ensure subrecipient compliance. Therefore, creating the deficiency in controls.

   Outside of in person conversation there was no additional communication regarding these funds other than the email which I am providing. All other parties are no longer with Humboldt county and access to those communications are unavailable.

Attached is the email in which this item was discussed. Along with the contracts, bid documents, and journal entries regarding the $101,794 in question.

MCDW & GCW Fixed Asset Meter Replacements FY25.pdf
Inbox - Weston Noyes - Outlook.pdf
ViewSavedForms.pdf
Bid & Procurement Documents.pdf
Ammendment.pdf
2024Dec_ARPA0084_HC_FinalizedFundingAmendment.pdf
25May_DCNR_ARPA0844_Meter Project Confirmation Letter.pdf
25Jan_HumbCounty_MeterQuotes.pdf
25Jan_HumbCounty_MeterInstallation_FourPointEngineering_EntityInformation_20250102-083055.pdf
24Nov_HumbCounty_Meter Installation Bid Procurement Docs.pdf
24Dec_HumbCounty_Meter Installation Bids Received 1.pdf
24Dec_ARPA0084_HumboldtCounty_SignedFundingAmendment 2.pdf

## 2.

## REQUEST from CM 07/05 12:34pm

"Pursuant to the pending NPRA request filed on July 5, 2026, please include any and all written correspondence, management letters, preliminary drafts, and final findings transmitted between Drake Rose & Associates and the Humboldt County Comptroller’s Office regarding the Fiscal Year 2025/2026 audit."

Cody Maltzman

## RESPONSE from WN 07/06 4:56pm

Hello,

Per your request, I am writing to inform you that the Comptroller's office does not have any written correspondence, management letters, preliminary drafts, or final findings transmitted between Drake Rose & Associates regarding the Fiscal Year 2025/2026 audit.

Thank you,

# 3.

# REQUEST from CM 07/07 1:59pm

**TO:** Weston Noyes, Humboldt County Comptroller / Auditor

**RE:** IMMEDIATE AMENDMENT TO SUPPLEMENTAL NRS 239 DEMAND – Vendor Contracts
**DATE:** July 7, 2026

Mr. Noyes,

To ensure full production under the active NRS Chapter 239 public records demand sent earlier today regarding the $5.9M Groundwater Retirement Program, please include the following mandatory financial records in your office's 5-day statutory production window:

- **1. PRIVATE CONTRACTOR AGREEMENTS:** All independent contractor agreements, professional services contracts, and scopes of work executed between Humboldt County, the HRBWA, and Jeff Fontaine (or any private corporate entity or consultancy controlled by Fontaine) from January 1, 2023, to present.
- **2. VENDOR LEDGERS & IRS FORM 1099s:** All itemized vendor payment ledgers, claims approvals, disbursement vouchers, and IRS Form 1099 records detailing public funds paid to Jeff Fontaine as a private contractor while executing the duties of HRBWA Executive Director.

Because these financial records involve the direct expenditure of public funds by Humboldt County as the fiduciary host for this interlocal agency, they are immediate public records. A failure to produce these contracts or any attempt to withhold them under a claim of private vendor privilege will be documented as a willful violation of NRS 239.0107.

# RESPONSE from WN 07/07 3:33pm

Hello,
you will find my comments provided in response to your requests below. The records requested are detailed in my response and included as attachments to this email.
Thank you,
**Weston Noyes**
*Humboldt County Comptroller / Auditor*
50 W. Fifth Street, Room 203
Winnemucca, NV 89445
Office: (775) 623-6467
Fax: (775) 623-6449

**TO:** Weston Noyes, Humboldt County Comptroller / Auditor

**RE:** IMMEDIATE AMENDMENT TO SUPPLEMENTAL NRS 239 DEMAND – Vendor Contracts
**DATE:** July 7, 2026
Mr. Noyes,
To ensure full production under the active NRS Chapter 239 public records demand sent earlier today regarding the $5.9M Groundwater Retirement Program, please include the following mandatory financial records in your office's 5-day statutory production window:

- **1. PRIVATE CONTRACTOR AGREEMENTS:** All independent contractor agreements, professional services contracts, and scopes of work executed between Humboldt County, the HRBWA, and Jeff Fontaine (or any private corporate entity or consultancy controlled by Fontaine) from January 1, 2023, to present.

  Attached is the cooperative agreement establishing the HRWBA which states that the HRWBA has the authority to enter into contract and be contracted with. The County itself has not entered into any contract with the HRBWA or Mr. Fontaine, therefore, the County does not have any record of independent contractor agreements, professional service contracts, and scopes of work between the county, the HRBWA, and Jeff Fontaine other than what is established in the cooperative agreement.
- **2. VENDOR LEDGERS & IRS FORM 1099s:** All itemized vendor payment ledgers, claims approvals, disbursement vouchers, and IRS Form 1099 records detailing public funds paid to Jeff Fontaine as a private contractor while executing the duties of HRBWA Executive Director.

  Attached is a vendor history report which details all payments made to Vendor Jeffrey A Fontaine DBA. Nevada Authority Management, LLC. Including Payable Numbers, Payment Descriptions, Post Date, Payment Date, & Amount. Also attached is a copy of all 1099's issued to Jeffrey A Fontaine.

Because these financial records involve the direct expenditure of public funds by Humboldt County as the fiduciary host for this interlocal agency, they are immediate public records. A failure to produce these contracts or any attempt to withhold them under a claim of private vendor privilege will be documented as a willful violation of NRS 239.0107.
Sincerely
Cody Maltzman

# 4.
# Request from CM 07/07/26 1:43PM

TO: Weston Noyes, Humboldt County Comptroller / Auditor

RE: EXPANDED SUPPLEMENTAL NRS Chapter 239 PUBLIC RECORDS DEMAND
PROJECT: $5.9M+ Groundwater Retirement Program (Federal Davis-Bacon Compliance & Payroll Records)
DATE: July 7, 2026

Mr. Noyes,

I am writing to formally supplement my previous public records requests under the Nevada Public Records Act (NRS Chapter 239).

Your office previously confirmed in writing that the Comptroller's office *"does not have any written correspondence, management letters, preliminary drafts, or final findings transmitted between Drake Rose & Associates regarding the Fiscal Year 2025/2026 audit."*

To reconcile this admitted lack of a written audit trail with the $6,099,328.41 total federal allocation ($5.9M+ programmatic grant) for the HRBWA Water Right Retirement Program, demand is hereby made for the immediate inspection and electronic production of all primary federal labor, wage, and payroll compliance documents.

On April 6, 2024, HRBWA Executive Director Jeff Fontaine executed an electronic signature certifying absolute compliance with federal Davis-Bacon Act requirements and "Buy American" provisions to secure a $29,281.97 loan draw against the multimillion-dollar authorization. Under federal law (29 CFR § 5.5(a)(3)(ii) and 40 U.S.C. § 3145), any local government unit administering these funds must maintain weekly certified payroll records for all covered mechanics, laborers, field technicians, or contractors executing infrastructure and water right retirement monitoring operations.

Therefore, pursuant to NRS Chapter 239, please provide electronic copies of the following public records within five (5) business days:

- 1. CERTIFIED WEEKLY PAYROLL REPORTS (U.S. DOL FORM WH-347): All weekly certified payroll reports, wage statements, and fringe benefit logs submitted by prime contractors, subcontractors, or subrecipients utilizing, drawing from, or monitoring the $5,900,000+ Groundwater Retirement Program capital.

- 2. PREVAILING WAGE DETERMINATIONS: The specific U.S. Department of Labor General Wage Decisions incorporated into the bid solicitations, interlocal contracts, and grant subrecipient agreements for this project.
- 3. EMPLOYEE COMPLIANCE INTERVIEWS (STANDARD FORM 1445): All labor standards interview records, on-site inspection logs, and field check reports executed by Humboldt County or HRBWA personnel to verify Davis-Bacon compliance.
- 4. INDEPENDENT AUDITOR BILLING AND SCOPE AMENDMENTS: All itemized progress billings, contract engagement sheets, and scope-of-work modifications submitted by Drake Rose & Associates from January 1, 2024, to present, specifically referencing the testing or auditing of federal pass-through grants or Davis-Bacon compliance.
- 5. SUBRECIPIENT MONITORING LOGS & RECIPIENT MATRICES: All written documentation detailing the county's tracking of federal fund distribution to the Golconda Water District or any other water district, explicitly demonstrating the corrective actions taken to resolve the "significant deficiency" cited under Audit Finding 2024-007.

LEGAL NOTICE OF STATUTORY CONFLICT & LIABILITY EXPOSURE:
As the fiduciary, financial agent, and host county for the HRBWA, Humboldt County holds sole custody of these federal financial files. If your office asserts that these weekly certified payroll records and monitoring logs do not exist in written form, please state so explicitly in your response.

Be advised that a formal, written statement confirming the non-existence of these mandatory federal compliance documents will be utilized as *prima facie* evidence of continuous fiduciary malfeasance under NRS 281A, concrete validation of uncorrected Single Audit material weaknesses (Findings 2023-001 through 2024-007), and a direct misrepresentation of federal compliance by Executive Director Fontaine. Failure to produce these documents or to state their explicit non-existence will be treated as a willful violation of NRS 239.0107, exposing the County to immediate civil action, mandatory attorney fees, and statutory penalties.

Sincerely,

Cody Maltzman

## RESPONSE from WN 07/07 5:14pm

Hello,

Pursuant to NRS 239.0107, I am in receipt of your request and will provide a response in accordance with the provisions of NRS 239.0107 no later than the end of the fifth business day following the date of receipt.

Thank you,

## RESPONSE from WN 07/08 1:53 PM

Hello,

29 CFR § 5.5(a)(3)(ii) and 40 U.S.C. § 3145 do not apply to non-construction projects which would include water rights retirement. The signed certification (attached) is on a Nevada Infrastructure Finance System (NFIS) form that was used by the Nevada Department of Conservation and Natural Resources for their Nevada Water Conservation and Infrastructure Initiative which used ARPA funds for both infrastructure and non-infrastructure projects. Because these requirements do not apply there is no documentation related to items 1, 2, & 3 of your request. I have previously provided each of the draw requests submitted and approved by the Nevada Department of Environmental Protection in which any documents required would be filed.

4. Independent Auditor Billing and Scope Amendments:

See attached "Drake Rose Invoices FY25 Audit"

5. SUBRECIPIENT MONITORING LOGS & RECIPIENT MATRICES:

See attached "Corrective Plan of Action" page #4.

Thank you,

## REQUEST from CM 07/08 3:10pm

Mr. Noyes,

Thank you for clarifying that these funds originate from the Nevada Water Conservation and Infrastructure Initiative via federal ARPA SLFRF allocations.

While 29 CFR § 5.5(a)(3)(ii) governs construction labor, 2 CFR § 200 (Uniform Guidance) applies to all ARPA SLFRF expenditures, specifically regarding Subrecipient Risk Assessments (2 CFR § 200.332(b)) and Pre-Award Determinations.

Since you have pointed to a "Corrective Plan of Action" rather than executed logs, please clarify: Is it the official position of the Comptroller's Office that Humboldt County did not generate or maintain independent written Subrecipient Risk Assessments for the Paradise Valley Weed Control District's water retirement project prior to the execution of these ARPA draws?

Sincerely

Cody Maltzman

**RESPONSE from WN 07/08 3:10pm**

The Comptroller's Office does not assert that Humboldt County failed to generate or maintain the required Subrecipient Risk Assessment documentation.

## REQUEST from CM 07/08 3:53pm

Subject: RE: RE: Nevada Public Records Act Request – Subrecipient Risk Assessments

Mr. Noyes,

Thank you for that clarification. If it is the position of the Comptroller's Office that Humboldt County *did* generate and maintain the required Subrecipient Risk Assessment documentation for these ARPA/NFIS allocations, then those specific assessments are public records responsive to Item 3 of my active request.

Please provide the generated Subrecipient Risk Assessment documentation and pre-award determinations for this project within the statutory deadline.

If you possess these documents but are withholding them from production, please explicitly cite the specific Nevada Revised Statute (NRS) exemption that permits the Comptroller's Office to redact or withhold completed federal subrecipient risk assessments from a public records inspection.

Sincerely

Cody Maltzman

## RESPONSE from WN 07/08 4:29pm

Ms. Maltzman,

I want to ensure the Comptroller's Office provides the precise public records you are requesting within the timeframes required by NRS 239.0107. To do that, I need clarification on the scope of your request.

In your most recent correspondence, you referenced both:

• Subrecipient Risk Assessment documentation related to the Paradise Valley Weed Control District's water retirement project, and
• Item 3 of your original request: "Employee Compliance Interviews (Standard Form 1445), on-site inspection logs, and field check reports executed to verify Davis-Bacon compliance."

These are distinct categories of records, maintained differently and amongst different entities, and may not share the same naming conventions or documentation formats. To avoid any misunderstanding and to ensure I locate all responsive records, please clarify whether your use of "this project" refers to:

1. The Paradise Valley water retirement project's subrecipient risk assessment materials, or
2. The Davis-Bacon compliance documents listed under Item 3.

Because NPRA requires a government office to identify and produce records "with reasonable specificity," the Comptroller's Office must be able to clearly determine the exact documents you are requesting before a search can be completed. Your assistance in narrowing or precisely identifying the record types will help expedite the process and ensure accuracy.

If you prefer, I would be happy to schedule a meeting to review the scope of your active request's and ensure we are aligned on the specific records you seek.

Thank you,

# 5.

## REQUEST from CM 07/08 4:37pm

Mr. Noyes,

For your awareness, the Nevada State Controller's Office has reviewed this matter and confirmed that the relevant federal compliance records fall under the administrative jurisdiction of the Office of Federal Assistance (OFA) and the Governor's Finance Office (GFO).

As Humboldt County is the local recipient, these completed risk assessments and pre-award subrecipient tools are local public records subject to inspection under NRS 239. Please confirm whether your office possesses these files or if they must be subpoenaed directly from the state repositories.

## RESPONSE from WN 07/08 4:53pm

Please specify exactly which “completed risk assessments and pre-award subrecipient tools” you are referring to. You have submitted several separate requests, and in order to determine which records you are seeking and whether they are maintained by Humboldt County or another entity, I need clarification on the precise document or record type.

## REQUEST from CM 07/08 5:08pm

Subject: RE: RE: Nevada Public Records Act Request – Subrecipient Risk Assessments

Mr. Noyes,

To clarify, I am requesting the mandatory compliance records required under 2 CFR § 200.332(b) for evaluating each subrecipient's risk of noncompliance with federal statutes, regulations, and the terms and conditions of the subaward.

Specifically, this includes, but is not limited to:

The Form 010-GP 011 Pre-Award Risk Assessment (or the county-equivalent pre-award evaluation tool and risk-scoring sheets) used to assess subrecipients for the county's ARPA and NFIS grant fund allocations.

The Subrecipient Risk Assessment Questionnaires, financial internal control reviews, and prior audit history evaluations performed on the subrecipients before or during the award period.

The Risk Mitigation Plans and monitoring logs generated as a result of those risk assessments to determine the appropriate subrecipient monitoring under federal Uniform Guidance.

As Chief Deputy Controller James Smack of the State Controller’s Office has advised that these specific compliance records fall under the parallel oversight of the Office of Federal Assistance (OFA) and the Governor's Finance Office (GFO), please confirm whether Humboldt County generated and maintains its local copies of these required files, or if they were never completed by your office.

Sincerely

Cody Maltzman

# 6.

# REQUEST from CM 07/08 3:02pm

**To:** Weston Noyes, Humboldt County Comptroller

Mr. Noyes,

Pursuant to the Nevada Public Records Act (NRS Chapter 239), please provide copies of the following public records within five (5) business days:

1. **UEI Activity Logs & Authorizations:** All internal authorizations, emails, and logs from January 1, 2024, to the present, permitting, managing, or tracking the use of Humboldt County's Unique Entity Identifier (UEI) by the Paradise Valley Weed Control District (PVWCD) for grant applications, submissions, or drawdowns.
2. **Direct Grant Awards & Ledgers:** All Notices of Grant Award (NOGA), grant agreements, and internal ledger entries for state or federal grants received directly by the PVWCD from Fiscal Year 2024 to the present.
3. **Subrecipient Monitoring & Agreements:** All executed subrecipient agreements, memoranda of understanding (MOUs), or monitoring checklists between Humboldt County and the PVWCD governing the oversight of federal or state pass-through funds.
4. **Commingling & Double-Dipping Controls:** All internal memos, email correspondence, or tracking spreadsheets generated by the Comptroller's office regarding the financial reconciliation of PVWCD direct revenues against the county's general ledger, specifically concerning the prevention of duplicate federal benefits or overlapping scopes of work.

If any portion of this request is denied, please cite the specific NRS exemption and provide a log of redacted or withheld items as required by law.

Sincerely,

Cody Maltzman

# RESPONSE from WN 07/08 4:41pm

Hello,

Pursuant to NRS 239.0107, I am in receipt of your request and will provide a response in accordance with the provisions of NRS 239.0107 no later than the end of the fifth business day following the date of receipt.

Thank you,

## RESPONSE from WN 07/13/2026 12:09pm

Hello,

1. The Paradise Valley Weed Control District is issued its own Unique Entity Identifier (UEI). The Comptroller's Office does not possess or maintain any internal authorizations, emails, or logs permitting, managing, or tracking the use of Humboldt County's UEI for PVWCD grant applications, submissions, or drawdowns. Therefore, no responsive records exist for this item. The active SAM.gov registration for the PVWCD's UEI is attached for reference.

2. The Comptroller's Office is not in receipt of any Notices of Grant Award (NOGA) or grant agreements issued directly to the Paradise Valley Weed Control District for FY 2024 to present. These documents, if they exist, may be maintained by the PVWCD. You may wish to contact the PVWCD directly for those records. A General Ledger Entry Detail Report showing all PVWCD ledger entries associated with state or federal grant revenues recorded in the County system from FY 2024 to present is attached. No other responsive records exist in the Comptroller's Office regarding direct grant awards received by PVWCD.

3. The Comptroller's Office does not possess any executed subrecipient agreements, memoranda of understanding (MOUs), monitoring checklists, or similar documents between Humboldt County and the Paradise Valley Weed Control District. No responsive record exists for this item.

4. The Comptroller's Office does not maintain internal memos, email correspondence, or tracking spreadsheets regarding the financial reconciliation of PVWCD direct revenues against the County's general ledger for commingling prevention or double

dipping controls. The comptroller's internal controls would provide prevention of commingling and double dipping. No responsive record exists for this item.

# 7.

## REQUEST from CM 07/09 10:40am

Mr. Noyes,

To clarify further based on official tracking from the State of Nevada, I am requesting the mandatory compliance files for the direct NEU ARPA award (Coronavirus Local Fiscal Recovery Fund) received by Humboldt County from the US Treasury in the amount of $3,269,224.

Specifically, please provide the completed Subrecipient Risk Assessments, Form 010-GP 011 equivalents, and risk-scoring sheets required under 2 CFR § 200.332 for the 40 different projects funded and managed locally by Humboldt County under this specific direct award allocation.

If Humboldt County failed to generate or maintain these mandatory federal monitoring records for these 40 projects, please explicitly state so in writing to satisfy this request.

## REPONSE from WN 07/13/2026 10:55am

Hello,

Attached are the subrecipient monitoring documents related to the projects administered under the referenced SLFRF funding. The listed provided references the corresponding subrecipient monitoring documents for each project.

Thank you,

# 8.

# REQUEST from CM 07/09 3:07pm

**Subject:** Nevada Public Records Act Request – Professional Services & Consulting Contracts (Gina Rackley)

To the Custodian of Records,

Pursuant to the Nevada Public Records Act (NRS 239), I am requesting an inspection and copies of all public records concerning professional services, consulting, or independent contractor agreements between Humboldt County and Gina Rackley (including any LLC, firm, or business entity under her operation or ownership).

Specifically, I am requesting:

1. All fully executed contracts, retainer agreements, and scopes of work for consulting or financial services provided by Gina Rackley to the Humboldt County Comptroller's Office or the County Commission from the date of her departure as Comptroller to the present.
2. All itemized invoices, billing sheets, timesheets, and description-of-services logs submitted by Gina Rackley for payment.
3. All county vendor disbursement ledgers, check registers, and warrants showing the total public funds paid to her or her entity during this timeframe.

Please provide these records within the statutory 5-day window. If fees apply or redacts are made, please notify me with the specific NRS citations.

Sincerely,

# RESPONSE from WN 07/13/2026 12:19pm

Hello,

1. See attached agreement"Rackley-HuCo_01202026 executed 01212026.pdf"
2. See attached Invoices
3. See attached Vendor History Report and Check Report.

Thank you,

IN THE JUSTICE COURT OF

INCLINE VILLAGE-CRYSTAL BAY TOWNSHIP

COUNTY OF WASHOE, STATE OF NEVADA

| | |
|---|---|
| _____, Plaintiff(s), vs. _____, Defendant(s). | Case No.: _____ Dept. No.: _____ **REQUEST FOR COPIES OF AUDIO RECORDING OF COURT PROCEEDINGS** |

It is hereby requested that a duplication of the digitally recorded proceedings in the above-entitled case be made at a cost of $35.00 per CD.

Requestor's Name: _____

Requestor's Address: _____

_____

Requestor's Phone Number: _____

Requestor's Email Address: _____

Reason For Request: ☐ Appeal ☐ Other: _____

Hearing Date and Time: _____

Heard before Judge: _____ Number of CDs Requested: _____

Incline Justice Court will contact you once CD is ready to be picked up. Allow 2-3 business days from the date of this request.

_____ _____

Date Signature

_____

Print Name

THE BROADCAST OF ANY AUDIO RECORDING OF COURT PROCEEDINGS, WITHOUT THE PRIOR CONSENT OF A JUSTICE/JUDGE, IS STRICTLY PROHIBITED.



Incline Justice Court

JUSTICE COURT
INCLINE VILLAGE – CRYSTAL BAY
NORTH LAKE TAHOE
WASHOE COUNTY, NEVADA

MELISSA
MANGIARACINA
JUDGE

# Incline Justice Court

855 Alder Avenue Incline Village, NV 89451
(775) 832-4100 (775) 832-4162 - Fax
IJCinfo@washoecounty.gov

## REQUEST FOR RECORDS CHECK OR COPIES

**Requestor (Please fill out all fields completely, incomplete entries will delay your request):**

Request for: ☐ Copies ☐ Certified Copies ☐ Records Check

Subject's Name: _____
Subject's Date of Birth: _____
Case #(s) and/or charges: _____

Records Check # of Years: _____
Category: ☐ Criminal ☐ Traffic ☐ Formal Civil ☐ Protection Orders ☐ Small Claims ☐ Evictions

Description of request:

_____
_____
_____
_____
_____

**All Fees must be paid before the records are released.**
Records Check - $1.00 per year - $5.00 minimum
Copies - $0.50 page
Certified Copies - $3.00 per document
* Fees charged pursuant to NRS 4.060 (m)(n)(o)

If a record request is based on a "name only" search, the Incline Justice Court does not guarantee that any record found is actually related to the individual whom the party requesting information is interested.

I understand and agree to release from liability and promise to hold harmless, under any and all causes of legal action, the Incline Justice Court and any and all of its judges and/or employees who conduct my record search for any statement(s), omission(s) or infringement(s) upon any legal rights that may be involved in conducting this search.

Signature: _____
Date : _____

Name: _____
Address: _____
Email: _____
Phone/Fax: _____

FOR COURT USE ONLY
Record found ☐ No record found ☐
Case #(s)_____

_____ _____
Court Clerk Date

◉ Return originals by mail
*** Must provide self addressed envelope with postage***

○ Call when ready for pickup

Rev. 2/29/2024

**ANTHONIE BISHOP WEYLAND**
[redacted]

May 22, 2026

**VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED**
**AND VIA EMAIL**

Second Judicial District Court of the State of Nevada
Attn: Court Administrator
75 Court Street
Reno, NV 89501

Alicia L. Lerud
Court Administrator and Clerk of Court
Second Judicial District Court
75 Court Street, Reno, NV 89501

Emily B. Reed
Assistant Court Administrator and ADA Coordinator
Second Judicial District Court
75 Court Street, Reno, NV 89501

Office of the Attorney General, State of Nevada
Attn: Civil Division
100 N. Carson Street
Carson City, NV 89701-4717

**Re: LITIGATION PRESERVATION DEMAND**
*Weyland v. Second Judicial District Court, et al.*
United States District Court, District of Nevada
**Case No. 3:26-cv-00361-MMD-CSD**

Dear Court Administrator Lerud, ADA Coordinator Reed, and Counsel:

**PURPOSE OF THIS LETTER**

I write to provide formal notice that I have filed, or am contemporaneously filing, a civil action in the United States District Court for the District of Nevada against the Second Judicial District Court, Alicia L. Lerud (in her official capacity as Court Administrator and Clerk of Court), and Emily B. Reed (in her official capacity as ADA Coordinator and Assistant Court Administrator), asserting claims under Title II of the Americans with Disabilities Act, 42 U.S.C. §§ 12131–12134, and its implementing regulations at 28 C.F.R. Part 35.

This letter constitutes a formal demand that you immediately implement a litigation hold to identify, preserve, and prevent the destruction, alteration, deletion, or modification of all

documents, communications, electronically stored information ("ESI"), and tangible things that are relevant or potentially relevant to the claims and defenses in this action. This obligation arises under federal common law, Federal Rule of Civil Procedure 37(e), and the inherent authority of the federal courts. See *Zubulake v. UBS Warburg LLC*, 220 F.R.D. 212 (S.D.N.Y. 2003); *Apple Inc. v. Samsung Electronics Co.*, 888 F. Supp. 2d 976, 990–92 (N.D. Cal. 2012).

The duty to preserve evidence arises when a party knows or should know that evidence is relevant to pending or reasonably anticipated litigation. See *Hynix Semiconductor Inc. v. Rambus Inc.*, 645 F.3d 1336, 1345–46 (Fed. Cir. 2011). As of the date of this letter, that duty is triggered for all recipients. Any destruction, alteration, or deletion of potentially relevant evidence after receipt of this notice may constitute spoliation with intent to deprive within the meaning of Federal Rule of Civil Procedure 37(e)(2), potentially warranting adverse inference instructions, dismissal of defenses, or other case-dispositive sanctions.

## PROPORTIONALITY AND SCOPE

This preservation demand is proportional to the needs of this case under Federal Rule of Civil Procedure 26(b)(1). The claims at issue involve documented communications between a specific individual (Plaintiff) and specific SJDC offices and officials over a defined time period (January 2025 through the present). The categories of documents identified below correspond directly to the three theory modules alleged in the Complaint: (1) effective communication under 28 C.F.R. § 35.160 and § 35.164; (2) presentment and routing under 28 C.F.R. § 35.130(b)(7); and (3) verification pathway under the equal-participation mandate of 42 U.S.C. § 12132. Each preservation category is tied to specific factual allegations in the Complaint and is limited to the persons, time periods, and subject matters relevant to those allegations.

## SCOPE OF PRESERVATION DEMAND

You must immediately take all steps necessary to preserve the following categories of documents and information, whether in paper, electronic, or any other format:

### 1. ADA ACCOMMODATION AND GRIEVANCE RECORDS

All documents, communications, notes, and files relating to ADA accommodation requests, ADA grievances, and ADA-related communications submitted by or on behalf of Anthonie Bishop Weyland from January 1, 2025 through the present, including but not limited to:

(a) All accommodation request intake forms, logs, or tracking records;

(b) All grievance files, including Grievance Nos. 2025-001, 2025-002, and 2025-003;

(c) All written determinations, closure notices, and decision letters;

(d) All internal notes, memoranda, or communications regarding the processing, review, or disposition of any Weyland accommodation request or grievance;

(e) All appeal files and records of appeal decisions;

(f) All records of the interactive process, including any assessment of whether requested accommodations would constitute a fundamental alteration or undue burden under 28 C.F.R. § 35.164, whether or not a written determination was issued.

**2. ELECTRONIC COMMUNICATIONS**

All emails, text messages, instant messages, voicemail recordings, calendar entries, and other electronic communications to, from, or concerning Anthonie Bishop Weyland, sent or received by any SJDC employee, including but not limited to communications sent to or from the following email addresses or mailboxes:

(a) ADARequests@washoecourts.us;

(b) Alicia.Lerud@washoecourts.us (or any Lerud email address at any domain);

(c) Emily.Reed@washoecourts.us (or any Reed email address at any domain);

(d) eFlexSupport@washoecourts.us;

(e) WashoeCourtRecords@washoecourts.us (or any Records Department address);

(f) WashoeCourtAdministration@washoecourts.us;

(g) Any other SJDC email address that sent or received communications regarding Weyland's accommodation requests, grievances, case association issues, or eFlex account.

This includes all attachments, metadata (including sender, recipient, date/time stamps, routing headers, and read/delivery receipts), and any communications forwarded internally that reference or discuss Plaintiff's requests, grievances, or ADA-related interactions.

**Personal devices and accounts:** To the extent that any SJDC employee used a personal email account, personal phone, text messaging application, or other non-SJDC communication channel to send, receive, or discuss any communication relating to Plaintiff's ADA accommodation requests, grievances, or case association issues, those communications are within the scope of this preservation demand regardless of the device or platform on which they reside.

**3. eFLEX SYSTEM RECORDS AND METADATA**

All records, data, metadata, system logs, configuration records, and administrative records relating to:

(a) The eFlex account associated with Anthonie Bishop Weyland;

(b) The account association between Weyland's current eFlex profile and Case No. CV02-04984;

(c) Any system-level, administrator-level, database-level, or vendor-level logs, audit trails, change records, or transaction logs relating to account associations, security-level modifications, or case linkages affecting Weyland's account;

(d) Any system configuration records, policy settings, or administrative rules documenting the "intentional Court policy" governing unique-identifier account associations referenced in Court Administrator Lerud's January 12, 2026 correspondence;

(e) All records relating to the eFlex system's handling of name-change orders and post-name-change account associations;

(f) All backup tapes, system images, database snapshots, or archived data that may contain records responsive to (a) through (e) above, even if such records have been deleted from the active production environment.

Court Administrator Lerud confirmed on January 12, 2026 that "user-level audit/access logs and/or account-case association histories do not exist." This preservation demand is not limited to user-level logs. Any system-level, administrator-level, database-level, or vendor-level records that contain information about account activity, association changes, or system modifications must be preserved regardless of how they are categorized within the system architecture.

**4. ADA POLICIES, PROCEDURES, AND TRAINING RECORDS**

(a) All current and former ADA policies, procedures, and guidelines applicable to SJDC, including any internal operating procedures for processing accommodation requests or grievances;

(b) All ADA coordinator designation documents, including any administrative orders, memoranda, or correspondence designating Emily B. Reed or any other individual as ADA Coordinator under 28 C.F.R. § 35.107(a);

(c) All ADA training records, curricula, attendance logs, and materials provided to SJDC staff from January 1, 2020 through the present;

(d) All public notices, signage, website content, and informational materials regarding ADA accommodations posted or published by SJDC, including all versions and any modifications;

(e) All records documenting any changes to ADA coordination staffing, policies, or procedures made after the filing of Plaintiff's first accommodation request on August 8, 2025.

**5. PERSONNEL AND ORGANIZATIONAL RECORDS**

(a) Administrative Order 2021-09 appointing Alicia L. Lerud as Court Administrator and Clerk of Court, and any subsequent administrative orders modifying, supplementing, or superseding that appointment;

(b) Any organizational charts, duty statements, or position descriptions defining the responsibilities of the Court Administrator, Clerk of Court, Assistant Court Administrator, and ADA Coordinator positions;

(c) Any records documenting the delegation of ADA grievance decision-making authority, including any written or informal delegation from Lerud to Reed or from either to any other SJDC employee.

**6. COURT RECORDS AND FILING SYSTEM RECORDS**

(a) All records, correspondence, and internal communications relating to Weyland's requests for administrative correction of the CV02-04984 case association;

(b) All records relating to SJDC's policies and procedures for processing filings submitted via ADA email accommodation;

(c) All records relating to the designation of filing timestamps for documents submitted via email accommodation versus eFlex;

(d) All records relating to the September 16, 2025 instruction from Deputy Clerk Leads that "any document that you wish for a Judge to review would need to be submitted with the filing of a Request for Submission," including any policy, rule, or training material supporting or contradicting that instruction.

**7. IN-PERSON INTERACTION RECORDS**

All notes, memoranda, queue tickets, visitor logs, sign-in sheets, counter service records, or other records documenting in-person visits or interactions between Anthonie Bishop Weyland and SJDC staff, including but not limited to visits on August 6, 2025, January 2, 2026, and February 26, 2026 (in-person delivery of constructive denial notice to Clerk's Office with receipt provided).

**IDENTIFIED CUSTODIANS**

The following individuals and offices have been identified as custodians of documents and information within the scope of this preservation demand. This list is based on Plaintiff's direct interactions with SJDC and is not intended to be exhaustive. You are obligated to identify and notify any additional custodians who may possess, have custody of, or control documents or information responsive to this demand.

**Internal Custodians (SJDC employees and offices):**

**1. Alicia L. Lerud** — Court Administrator and Clerk of Court. Decision-maker on ADA grievances; issued substantive responses on case association, audit logs, and verification pathway denial (January 12, 2026). Acknowledged Plaintiff's December 10, 2025 request (December 11, 2025).

**2. Emily B. Reed** — Assistant Court Administrator and ADA Coordinator. Primary point of contact for all ADA accommodation requests and grievances since August 2025. Issued accommodation terms (August 29, September 11, 2025), grievance closures (September 11, 2025), withdrawal threat (October 3, 2025), and confirmed Lerud's assumption of response authority (February 23, 2026).

**3. Deputy Clerk Leads office** (DeputyClerkLeads@washoecourts.us) — Issued September 16, 2025 response imposing blanket Request for Submission requirement without document-specific guidance. Individual staff members within this office who authored or reviewed that response are custodians.

**4. Barbara Keyl** — Litigant Services Manager. Responded to Plaintiff's formal complaint regarding procedural assistance (July 19, 2024). Signed receipt of ADA materials (January 12, 2026). Oversees Resource Center for self-represented litigants.

**5. Brandon Smith** — Filing Office Program Manager. Copied on Reed's communications regarding Plaintiff's filing and accommodation issues (September 19, 2024). Referenced in Lerud's September 27, 2024 response as having participated in discussions with Plaintiff regarding the case association.

**6. Deputy Clerk Gabriel** — eFlexSupport. Authored September 10, 2024 response stating that case association was "by design" and comparing name-change associations to social security numbers. Also interacted with Plaintiff in person regarding case disassociation procedures (January 2, 2026).

**7. Records Department staff** (records@washoecourts.us / WashoeCourtRecords@washoecourts.us) — Issued January 5, 2026 dual-response disclaiming all knowledge of Plaintiff's requests and directing Plaintiff to redirect himself to Court Administration or ADA Requests without forwarding the inquiry. Individual staff members who authored those responses are custodians.

**8. CourtTech Department** (CourtTech@washoecourts.us) — Technology office with potential custody of system-level logs, eFlex configuration records, account-association metadata, and any administrator-level audit trails.

**9. Chris Long** — Chief Technology Officer, SJDC Executive Leadership Team. Responsible for technology systems including eFlex. Custodian of system architecture documentation, vendor contracts, data retention policies, and any system-level logs or configuration records.

**10. Jonathan Bye** — IT Manager, reporting through CTO office. Potential custodian of system administration records, backup schedules, and technical implementation of account-association policies.

**External Custodian (third-party vendor):**

**11. eFlex system vendor** — The third-party technology vendor that develops, maintains, and/or hosts the eFlex electronic filing system used by SJDC. This vendor may maintain system-level logs, database transaction records, backup data, account-association change histories, and other records that SJDC's internal systems do not retain at the user level. SJDC is directed to identify this vendor by name and to notify the vendor of this litigation hold pursuant to Preservation Instruction (e) above. If SJDC's contract with the vendor includes data retention or destruction provisions, those provisions must be suspended for all data within the scope of this demand.

This custodian list will be supplemented as discovery proceeds and additional custodians are identified. The absence of a specific individual from this list does not relieve SJDC of its obligation to preserve documents in the possession, custody, or control of any person who may hold responsive materials.

## PRESERVATION INSTRUCTIONS

To comply with this demand, you must immediately:

(a) Distribute this letter to all persons within your organization who may have possession, custody, or control of documents or information within the scope of this demand, including IT personnel, records custodians, system administrators, front-counter staff who interacted with Plaintiff, and any supervisor or manager who received or reviewed communications regarding Plaintiff's accommodation requests or grievances;

(b) Issue a litigation hold notice to all custodians identified above, instructing them to preserve all documents in their original form, including metadata, and not to alter, move, rename, delete, or modify any such documents. Retain a copy of the hold notice and any acknowledgments received;

(c) Suspend all routine document destruction, including any automatic deletion schedules, email purge policies, backup tape rotation cycles, or records retention disposal schedules, for all categories of documents and information described above;

(d) Preserve backup media, including backup tapes, system images, database snapshots, or other electronic storage media containing potentially relevant information. Do not overwrite, recycle, or destroy any such media;

(e) Notify your eFlex system vendor (or any third-party technology vendor maintaining data on behalf of SJDC) of this litigation hold and instruct the vendor to preserve all data, logs, metadata, system configurations, and backup records relating to the Weyland account and the CV02-04984 case association. Retain a copy of the notification sent to the vendor and any acknowledgment received. If the vendor has its own data retention or destruction policies, those policies must be suspended for all data within the scope of this demand;

(f) Preserve web content, including the current state of SJDC's ADA-related web pages, including the Americans with Disabilities Act Accommodation Requests page identifying Emily B. Reed as the designated ADA contact, any prior versions of those pages, and any analytics or access logs associated with those pages;

(g) Preserve personal device communications by notifying all custodians that any communications regarding Plaintiff's ADA requests or grievances stored on personal devices, personal email accounts, or personal messaging applications are within the scope of this hold and must not be deleted.

**SUCCESSOR-IN-OFFICE OBLIGATION**

Because Defendants Lerud and Reed are sued in their official capacities, the preservation obligations established by this letter attach to the offices of Court Administrator/Clerk of Court and ADA Coordinator/Assistant Court Administrator, not solely to the individuals currently holding those positions. If either Lerud or Reed vacates her position during the pendency of this litigation, the successor officeholder assumes the full preservation obligations described in this letter, and the departing officeholder must ensure that all documents within her possession, custody, or control are transferred to her successor or otherwise preserved before departure. See Fed. R. Civ. P. 25(d) (automatic substitution of successor public officers).

**DUTY TO SUPPLEMENT**

This preservation demand identifies the categories of documents and information known to Plaintiff at the time of filing. As discovery proceeds, additional custodians, categories, or sources of relevant information may be identified. Plaintiff reserves the right to supplement this demand to include additional preservation categories. However, the obligation to preserve documents within the categories identified above is effective immediately upon receipt of this letter and does not depend on the commencement of formal discovery.

## CONSEQUENCES OF NON-COMPLIANCE

Failure to preserve relevant evidence after receiving this notice may result in sanctions under Federal Rule of Civil Procedure 37(e). Under Rule 37(e)(1), if ESI that should have been preserved is lost because a party failed to take reasonable steps to preserve it and it cannot be restored or replaced through additional discovery, the court may order measures no greater than necessary to cure the prejudice. Under Rule 37(e)(2), if the court finds that the party acted with the intent to deprive another party of the information's use in the litigation, the court may presume the lost information was unfavorable to the party, instruct the jury that it may or must presume the information was unfavorable, or dismiss the action or enter a default judgment.

Receipt of this letter establishes that all recipients have actual knowledge of their preservation obligations. Any destruction, alteration, or deletion of potentially relevant evidence occurring after receipt of this letter cannot be characterized as inadvertent or routine, and may support a finding of intent under Rule 37(e)(2). See *Zubulake v. UBS Warburg LLC*, 229 F.R.D. 422 (S.D.N.Y. 2004).

## CONFIRMATION AND RESPONSE

This preservation demand covers documents and information in the possession, custody, or control of the Second Judicial District Court, its officers, employees, agents, and any third-party service providers or vendors acting on its behalf. The obligation to preserve continues for the duration of this litigation, including any appeals.

Please confirm receipt of this letter and your implementation of a litigation hold by responding in writing within fourteen (14) days to the address above. Your confirmation should include: (i) the date the litigation hold was issued; (ii) the identity of the person(s) responsible for implementing and monitoring the hold; (iii) confirmation that your eFlex system vendor has been notified; and (iv) any objections to the scope of this demand. If you have questions about the scope of this preservation demand, please contact me directly.

Respectfully,

/s/ Anthonie Weyland
**ANTHONIE BISHOP WEYLAND**

[redacted]

**cc:**

Clerk of Court
United States District Court, District of Nevada
400 S. Virginia Street, Room 301
Reno, NV 89501

*(filed as notice of preservation demand, Case No. 3:26-cv-00361-MMD-CSD)*

# SECOND JUDICIAL DISTRICT COURT
## STATE OF NEVADA
## WASHOE COUNTY

**COURT ADMINISTRATOR/CLERK OF COURT**
Alicia Lerud, Esq.

**ASSISTANT COURT ADMINISTRATOR**
Emily Reed, Esq.

**75 COURT STREET**
**RENO, NEVADA 89501**
**www.washoecourts.com**
**T: (775) 328-3194**
**F: (775) 328-3206**

January 22, 2024

Nicholas Shepack
Nevada State Deputy Director
Fines and Fees Justice Center | Reno N
Via e-mail to: [redacted]

Mr. Shepack:

This communication is in response to your e-mail correspondence of December 13, 2023 which is attached hereto. You are seeking information and documentation pertaining to the appointment of the Public Defender along with the assessment and collection of fees associated with representation by the Public Defender's office.

Responses to your requests are as follows:

*Disaggregate Judge Level Data Request:*

1. *By Judge, total number of cases over which each Judge presided in which a Public Defender was appointed.*

Enclosed please find the requested data for calendar years 2021, 2022, and 2023 respectively. Each of these reports includes the number of times counsel was appointed for a Defendant in a criminal case. You will need to review the individual Orders to determine if the appointed counsel was a Public Defender.

2. *By Judge, total number of defendants who were assessed Public Defender fee.*

The District Court does not have a report that is specifically responsive to this request. From list the cases provided to you in response to #1 hereinabove, you can review the Judgments of Conviction filed in each case to determine what Public Defender fees, if any, were assessed against a Defendant.

3. *By Judge, total number of Public Defender fees assessed*

The District Court does not have a report that is specifically responsive to this request. From list the cases provided to you in response to #1 hereinabove, you can review the Judgments of Conviction filed in each case to determine what Public Defender fees, if any, were assessed against a Defendant and then add them up for each judicial department.

*4. By Judge, total number of Public Defender fees collected.*
The District Court is not in possession of any information or documentation responsive to this request. This question should be directed to the Washoe County Public Defender's office.

*Aggregate Court Level Data:*

*5. Total number of cases in which Defendants received a Public Defender*
The District Court does not have a report that is specifically responsive to this request. From list the cases provided to you in response to #1 hereinabove, you can review the individual Orders to determine if the appointed counsel was a Public Defender to generate a total aggregate count.

*6. Total number of defendants who were assessed Public Defender fees.*
The District Court does not have a report that is specifically responsive to this request. From list the cases provided to you in response to #1 hereinabove, you can review the Judgments of Conviction filed in each case to determine what Public Defender fees, if any, were assessed against a Defendant.

*7. Total amount of Public Defender fees assessed*
The District Court does not have a report that is specifically responsive to this request. From list the cases provided to you in response to #1 hereinabove, you can review the Judgments of Conviction filed in each case to determine what Public Defender fees, if any, were assessed against a Defendant and then add them up for an aggregate total.

*8. Total amount of Public Defender fees collected.*
The District Court is not in possession of any information or documentation responsive to this request. This question should be directed to the Washoe County Public Defender's office.

If you would like to review any of the public filings in the attached case list, the District Court offers free access at the Law Library located at 75 Court Street, Reno, Nevada, or the Resource Center located at 1 S. Sierra Street, Reno, Nevada. EFlex global case view (subscription account) may also be purchased to view all public filings in our Court from any location. More information regarding global case view is available here.

Sincerely,

[redacted]

Emily Reed, Esq.
Assistant Court Administrator

Encls.

**From:** Nick Shepack [redacted]
**Sent:** Wednesday, December 13, 2023 10:35 AM
**To:** RecordReq <RecordReq@washoecourts.us>
**Cc:** Leisa Moseley [redacted]
**Subject:** Public Records Request for Second Judicial District Court

[**NOTICE:** This message originated outside of Second Judicial District Court, State of Nevada -- **DO NOT CLICK** on **links** or open **attachments** unless you are sure the content is safe.]

Good morning,

Attached is a public records request being submitted by the Fines and Fees Justice Center, a 501c3. We are seeking information regarding the use of public defenders in district courts and any associated fees.

To give your department time to review our request, we are submitting this request prior to the end of the year with the expectation that we will receive information after the new year. In addition to 2021 and 2022, We are requesting information from January 1, 2023 through December 31, 2023. Please let me know if you have any questions.

Regards,
Nick Shepack

--


**Nicholas Shepack**

Nevada State Deputy Director

Fines and Fees Justice Center | Reno N

[redacted]

Explore FFJC's Clearinghouse | Follow us

The purpose of this records request is to gain an understanding of legal defender fees charged to defendants who have court appointed counsel or public defenders in the state of Nevada. We are unsure what data is available and how detailed that data is. Because of this we are asking for data at multiple levels: aggregate court level data and disaggregated judge level data.

Disaggregate Judge Level Data Request:

1. Total number of cases over which each judge presided in which counsel was appointed.
2. The number of defendants who were assessed legal defender fees by each judge.
3. The total amount of legal defender fees assessed by each judge.
4. The total amount of legal defender fees collected from cases in each judge's court.

Aggregate Court Level Data:

1. Total number of cases in which defendants were appointed council or public defenders .
2. The total number of defendants who were assessed legal defender fees.
3. Total amount of legal defender fees assessed.
4. Total amount of legal defender fees collected.

Other Information:

1. Any documented directives, procedures, regulations or written documentation regarding the establishment of a defendant's ability to pay legal defender fees.
2. Any documented directives, procedures, regulations or written documentation regarding the establishment of a defendant's indigency status and right to appointed counsel.

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Second Judicial District Court,

Pursuant to Section 239.0107 and Section 239.010 of the Nevada Revised Statutes, I am requesting public information record data pertaining to [public defender fees– fees imposed for attorneys appointed at the public's expense on account of indigency]. Public defender fees may also be known as counsel fees or court-appointed counsel fees. I request that you provide this information electronically via email, if possible.

I specifically request the following for the years 2021, 2022 and 2023, disaggregated by year:

**Aggregate Court Level Data:**

- Total number of cases in which defendants received a public defender;.
- Total number of defendants who were assessed public defender fees;
- Total amount of public defender fees assessed;
- Total amount of public defender fees collected.

**Disaggregate Judge Level Data Request:**

- By judge, the total number of cases in which a public defender was appointed;
- By judge, the total number of defendants who were assessed public defender fee;
- By judge, the total amount of public defender fees assessed;
- By judge, the total amount of public defender fees collected.

**Copies of the following documents:**

- Directives, procedures, regulations, manuals, or written guidance regarding the establishment of a defendant's ability to pay public defender fees;
- Directives, procedures, regulations, manuals, or written guidance regarding the establishment of a defendant's indigency status and right to a public defender.

This request seeks non-identifiable data only; no personal identifying information is requested.

I ask for a waiver of any fees related to this request, given that the disclosure of the requested information is in the public interest and will contribute significantly to the public's understanding of how public defender fees are assessed and collected, as well as the extent of outstanding public defender fees in Nevada. The Fines and Fees Justice Center is a national resource hub, working with impacted communities, researchers, advocates, legislators, justice system stakeholders, and media across the United States. This information is not being sought for commercial purposes.

If collection or transmission of this data will take longer than five (5) business days, as required by Section 239.0107 of the Nevada Revised Statutes, please contact me about when I might expect the requested data.

If any of the collected information does not exist or is unreportable, please advise me in writing as to what specific data do not exist or are unreportable.

If the requested information exists, but you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

Thank you for considering my request.

Nicholas A Shepack
Nevada State Deputy Director
Fines and Fees Justice Center
[redacted]

# Second Judicial District Court
## Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D1 = Hon. KATHLEEN DRAKULICH
Date Range (Start = 1/1/2021 12:00:00AM End = 12/31/2021 12:00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR18-1332 - STATE VS. LISA MARIE SANDS (D1)(TN)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/25/2021 | ORDER APPOINTING PUBLIC DEFENDER'S OFFICE - Transaction 8513023 - Approved By: NOREVIEW : 06-25-2021:08:28:35 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/6/2021 | CORRECTED ORDER APPOINTING PUBLIC DEFENDER'S OFFICE - Transaction 8529123 - Approved By: NOREVIEW : 07-06-2021:16:51:57 |

**CR19-1013 - STATE VS. ALEXIS CYNTHIA ALEGRIA (D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/4/2021 | Transaction 8678771 - Approved By: NOREVIEW : 10-04-2021:09:37:40 |

**CR19-2357 - STATE VS. NICOLE JUSTINA DATTKE (D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/4/2021 | Transaction 8678754 - Approved By: NOREVIEW : 10-04-2021:09:34:16 |

**CR19-2453 - STATE VS. SHANE PATRICK RYAN (TN)(D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/23/2021 | Transaction 8510321 - Approved By: NOREVIEW : 06-23-2021:16:55:33 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/1/2021 | Transaction 8676957 - Approved By: NOREVIEW : 10-01-2021:11:48:32 |

**CR19-2479A - STATE VS. DANIEL SHADOW BEAR HUTCHINSON (TN)(D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/12/2021 | ORDER APPOINTING COUNSEL (APPELLATE) - Transaction 8692783 - Approved By: NOREVIEW : 10-12-2021:11:24:09 |

**CR19-2742 - STATE VS. ALEX MARTIN WARREN (D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/20/2021 | ORDER APPOINTING COUNSEL (APPELLATE) - Transaction 8402796 - Approved By: NOREVIEW : 04-20-2021:08:18:27 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/28/2021 | Transaction 8469269 - Approved By: NOREVIEW : 05-28-2021:11:27:16 |

**CR20-1273 - STATE VS. FRANK LEE WILLIS (TN)(D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/20/2021 | ORDER APPOINTING COUNSEL (APPELLATE) - Transaction 8605592 - Approved By: NOREVIEW : 08-20-2021:06:57:44 |

**CR20-1643 - STATE VS. SHANE PATRICK RYAN (TN)(D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/23/2021 | Transaction 8510323 - Approved By: NOREVIEW : 06-23-2021:16:56:03 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/1/2021 | Transaction 8676936 - Approved By: NOREVIEW : 10-01-2021:11:44:42 |

**CR20-1833E - STATE VS. CHRISTOPHER SCOTT BOLDEN (TN)(D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/2/2021 | Transaction 8778200 - Approved By: NOREVIEW : 12-02-2021:16:44:09 |

**CR20-2167A - STATE VS. JOSEPH NATHANIEL JOHNSON (TN) (D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/3/2021 | Transaction 8276916 - Approved By: NOREVIEW : 02-03-2021:11:02:27 |

**CR20-2803 - STATE VS. PORSHA DANEE MAJOR (TN)(D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/3/2021 | Transaction 8276911 - Approved By: NOREVIEW : 02-03-2021:11:01:23 |

**User Selected Criteria for this report:**

Judge ID = D1 = Hon. KATHLEEN DRAKULICH
Date Range (Start = 1/1/2021 12:00:00AM End = 12/31/2021 12:00:00AM)
Docket Code(s) = 2715

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**CR96-1581 - STATE VS. STEVEN FLOYD VOSS (D1)**

Electronically Filed 2715 - Ord Appointing Counsel Filed On: 1/29/2021 Transaction 8269787 - Approved By: NOREVIEW : 01-29-2021:10:14:18

# Second Judicial District Court
## Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D1 = Hon. KATHLEEN DRAKULICH
Date Range (Start = 1/1/2022 12:00:00AM End = 12/31/2022 12:00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR18-0455 - STATE VS. RUSS HAGH (D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/20/2022 | Recommendation and Order Appointing Counsel (Post-Conviction) - Transaction 9108326 - Approved By: NOREVIEW : 06-20-2022:12:53:27 |

**CR18-0887 - STATE VS. JOSE ANTONIO GOMEZ (TN) (D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/20/2022 | Transaction 8852432 - Approved By: NOREVIEW : 01-20-2022:09:15:16 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/30/2022 | Transaction 8870173 - Approved By: NOREVIEW : 01-30-2022:09:09:00 |

**CR18-0981 - STATE VS. JOSE ALBERTO MACHADO (D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/27/2022 | Recommendation and Order Appointing Counsel (Post-Conviction) - Transaction 9070745 - Approved By: NOREVIEW : 05-27-2022:08:34:42 |

**CR19-0212 - STATE VS. ERIC RANDAL HUNTER (D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/22/2022 | Transaction 9273875 - Approved By: NOREVIEW : 09-22-2022:10:13:15 |

**CR19-1403 - STATE VS. SEAN JACOB WILSON (TN) (D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/2/2022 | Transaction 8875491 - Approved By: NOREVIEW : 02-02-2022:08:11:05 |

**CR19-2043 - STATE VS. JESSE COLE LARSEN, SR. (TN) (D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/11/2022 | Transaction 9201657 - Approved By: NOREVIEW : 08-11-2022:18:29:50 |

**CR20-0192A - CONS: STATE VS. TALIB LAMAR SPEARS (TN)(D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/21/2022 | ORDER APPOINTING COUNSEL (APPELLATE) - Transaction 9270825 - Approved By: NOREVIEW : 09-21-2022:07:47:51 |

**CR21-0858 - STATE VS. RYAN EUGENE AGUIRRE (TN)(D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/19/2022 | Transaction 9415497 - Approved By: NOREVIEW : 12-19-2022:08:38:56 |

**CR21-2107 - STATE VS. SEAN WILLIAM STEINBERG (TN)(D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/7/2022 | Recomendation and Order Appointing New Counsel - Transaction 9396365 - Approved By: NOREVIEW : 12-07-2022:10:56:38 |

**CR21-2325 - STATE VS. ALBERTO TORRES CARO (TN)(D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/14/2022 | ORDER APPOINTING COUNSEL (APPELLATE) - Transaction 8895777 - Approved By: NOREVIEW : 02-14-2022:10:31:06 |

**CR21-2461 - STATE VS. CONNOR MICHAEL MCKENZIE (TN)(D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 11/2/2022 | Transaction 9341869 - Approved By: NOREVIEW : 11-02-2022:10:28:34 |

**CR21-3672 - STATE VS. ROBERT TROY GATES (TN)(D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/11/2022 | Recommendation and Order Appointing Counsel (Appeal) - Transaction 8942019 - Approved By: NOREVIEW : 03-11-2022:15:16:44 |

**User Selected Criteria for this report:**

Judge ID = D1 = Hon. KATHLEEN DRAKULICH
Date Range (Start = 1/1/2022 12:00:00AM End = 12/31/2022 12:00:00AM)
Docket Code(s) = 2715

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**CR22-5164 - STATE VS. ROBERT PAUL EIKELBERGER (D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/16/2022 | Transaction 9413807 - Approved By: NOREVIEW : 12-16-2022:10:51:44 |

**CR99-0636 - STATE VS. DANNY WILLIAMS (D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/23/2022 | Recommendation and Order Appointing Counsel (Post-Conviction) - Transaction 9221622 - Approved By: NOREVIEW : 08-23-2022:14:26:37 |

# Second Judicial District Court
## Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D1 = Hon. KATHLEEN DRAKULICH
Date Range (Start = 1/1/2023 12:00:00AM End = 12/31/2023 12:00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR08-1860 - STATE VS. CHARLES BEN FRITSCHE (TN) (D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/28/2023 | ORDER APPOINTING COUNSEL (APPELLATE) - Transaction 9854484 - Approved By: NOREVIEW : 08-28-2023:13:42:26 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/31/2023 | Recommendation and Order Apppointing Counsel - Transaction 9860533 - Approved By: NOREVIEW : 08-31-2023:08:13:13 |

**CR18-0981 - STATE VS. JOSE ALBERTO MACHADO (D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/29/2023 | ORDER APPOINTING COUNSEL (APPELLATE) - Transaction 9856155 - Approved By: NOREVIEW : 08-29-2023:10:48:21 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/31/2023 | Recommendation and Order Appointing Counsel - Transaction 9860974 - Approved By: NOREVIEW : 08-31-2023:10:31:00 |

**CR19-2439 - STATE VS. KEVIN ANTWONE BELCHER (TN) (D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/9/2023 | Recommendation and Order Appointing Counsel (Post-Conviction) - Transaction 9445428 - Approved By: NOREVIEW : 01-09-2023:10:36:31 |

**CR20-0118 - STATE VS. ROGER ALLEN CHINN JR. (TN)(D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/10/2023 | Recommendation and Order Appointing Counsel - Transaction 9603954 - Approved By: NOREVIEW : 04-10-2023:12:03:28 |

**CR21-1398 - STATE VS. ROGER ALLEN CHINN JR. (TN)(D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/10/2023 | Recommendation and Order Appointing Counsel - Transaction 9603969 - Approved By: NOREVIEW : 04-10-2023:12:05:03 |

**CR21-2420 - STATE VS. KAMANI JA'MAD HOLMES (TN)(D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/12/2023 | ORDER APPOINTING COUNSEL (APPELLATE) - Transaction 9768348 - Approved By: NOREVIEW : 07-12-2023:06:47:59 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/14/2023 | Recomendation and Order Appointing Counsel - Transaction 9774914 - Approved By: NOREVIEW : 07-14-2023:13:02:38 |

**CR21-2461 - STATE VS. CONNOR MICHAEL MCKENZIE (TN)(D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/7/2023 | Transaction 9600434 - Approved By: NOREVIEW : 04-07-2023:07:40:39 |

**CR21-2761 - CONS: STATE VS. JESUS A. RAMIREZ-ESTRADA (TN)(D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/24/2023 | Transaction 9629020 - Approved By: NOREVIEW : 04-24-2023:10:56:40 |

**CR22-0323 - ** consolidated into CR21-2761**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/24/2023 | Transaction 9629024 - Approved By: NOREVIEW : 04-24-2023:10:57:24 |

**CR22-2399 - STATE VS. CARLOS FLETCHER (TN)(D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/12/2023 | Recommendation and Order Appointing Counsel - Transaction 9717755 - Approved By: NOREVIEW : 06-12-2023:14:09:20 |

**CR22-3919B - STATE VS. LAMEDA NICOLE WHITE (TN)(D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/29/2023 | ORDER APPOINTING COUNSEL (APPELLATE) - Transaction 9749546 - Approved By: NOREVIEW : 06-29-2023:14:43:45 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/5/2023 | Recommendation and Order Appointing Counsel - Transaction 9755417 - Approved By: NOREVIEW : 07-05-2023:10:12:06 |

**User Selected Criteria for this report:**

Judge ID = D1 = Hon. KATHLEEN DRAKULICH
Date Range (Start = 1/1/2023 12:00:00AM End = 12/31/2023 12:00:00AM)
Docket Code(s) = 2715

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**CR22-4073C - STATE VS. NICOLE NANI HULIHEE-OLSON (TN) (D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/14/2023 | 4/13/2023 Arraignment - Transaction 9614224 - Approved By: NOREVIEW : 04-14-2023:14:44:02 |

**CR23-0072 - STATE V. MICHAEL SCOTT CORDERO (TN)(D1)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/18/2023 | ORDER APPOINTING COUNSEL (APPELLATE) - Transaction 9890842 - Approved By: NOREVIEW : 09-18-2023:07:49:35 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/19/2023 | Recommendation and Order Appointing Counsel - Transaction 9894902 - Approved By: NOREVIEW : 09-19-2023:13:03:01 |

# Second Judicial District Court
## Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D3 = Hon. TAMMY RIGGS
Date Range (Start = 1/1/2021 12:00:00AM End = 12/31/2021 12:00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR21-0159 - STATE VS. IAN SIMONEAU-BAYLISS (TN) (D3)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 11/4/2021 | ORDER RELIEVING PUBLIC DEFENDER AND APPOINTING ALTERNATE PUBLIC DEFENDER - Transaction 8731906 - Approved By: NOREVIEW : 11-04-2021:10:28:12 |

**CR21-0785 - STATE VS. JOSHUA DUANE CANADA (D3)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/3/2021 | 4/29/2021 Young Hearing - Transaction 8423646 - Approved By: NOREVIEW : 05-03-2021:09:46:43 |

**CR94-1795B - STATE VS. CARLOS GUTIERREZ (D3)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/3/2021 | Transaction 8476273 - Approved By: NOREVIEW : 06-03-2021:08:52:03 |

# Second Judicial District Court
## Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D3 = Hon. TAMMY RIGGS
Date Range (Start = 1/1/2022 12:00:00AM End = 12/31/2022 12:00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR12-0192 - STATE VS MICHAEL DAVID GIESBRECHT (D3)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/10/2022 | Transaction 8834019 - Approved By: NOREVIEW : 01-10-2022:08:58:50 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/28/2022 | Recommendation and Order Appointing Counsel (Post-Conviction) - Transaction 8869319 - Approved By: NOREVIEW : 01-28-2022:15:01:35 |

**CR20-0163 - STATE VS. WILL MENDOZA-PANIAGUA (TN) (D3)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/9/2022 | LEE HOTCHKIN RELIEVED FROM REPRESENTING DEFT; P.D.'S OFFICE APPOINTED - Transaction 8888987 - Approved By: NOREVIEW : 02-09-2022:13:26:11 |

**CR20-0793 - STATE VS. TIMOTHY JAMES VANDERLIN (D3)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/7/2022 | ORDER APPOINTING APD - Transaction 9246283 - Approved By: NOREVIEW : 09-07-2022:11:52:52<br>order sent to APD's office 9/7/22. Confirmed receipt. - ad |

**CR21-0475 - STATE VS. ANTHONY OCHOA (D3)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/6/2022 | ORDER RELIEVING PRIVATE COUNSEL AND APPOINTING P.D. - Transaction 8828795 - Approved By: NOREVIEW : 01-06-2022:08:37:22 |

**CR21-1722 - STATE VS. JAYSON DEWAYNE PROCTOR (TN) (D3)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/29/2022 | APD APPOINTED TO REPRESENT DEFT - Transaction 8969752 - Approved By: NOREVIEW : 03-29-2022:10:47:54 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/25/2022 | CONFLICT COUNSEL APPOINTED TO REPRESENT DEFT - ARRAIGNMENT SET 5/2/22 - Transaction 9015875 - Approved By: NOREVIEW : 04-25-2022:15:22:35 |

**CR22-1104 - STATE VS. JAIME ROBERT CALLAWAY (TN) (D3)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/18/2022 | P.D. APPOINTED TO REPRESENT DEFENDANT - Transaction 9317095 - Approved By: NOREVIEW : 10-18-2022:09:54:22 |

# Second Judicial District Court
## Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D3 = Hon. TAMMY RIGGS
Date Range (Start = 1/1/2023 12:00:00AM End = 12/31/2023 12:00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR02-2297B - STATE VS. JUAN ALFONSO NUNO-VELASCO (D3)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/3/2023 | Transaction 9647159 - Approved By: NOREVIEW : 05-03-2023:12:29:33 |

**CR20-0793 - STATE VS. TIMOTHY JAMES VANDERLIN (D3)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/20/2023 | Recommendation and Order Appointing Counsel - Transaction 9729693 - Approved By: NOREVIEW : 06-20-2023:10:44:36 |

**CR21-0723 - STATE VS. DAMON PRINCE CYRUS (TN) (D3)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/19/2023 | APD APPOINTED TO REPRESENT DEFENDANT - Transaction 9462955 - Approved By: NOREVIEW : 01-19-2023:08:27:51 |

**CR21-4166 - STATE VS. KELLY LANE NOLAND (TN) (D3)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/8/2023 | ORDER RELIEVING PD AND APPOINTING APD - Transaction 9499894 - Approved By: NOREVIEW : 02-08-2023:14:35:00 |

**CR22-1017 - STATE VS. JOSEPH KEITH BYRNE (D3)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/4/2023 | PD TO REPRESENT DEFT - Transaction 9438992 - Approved By: NOREVIEW : 01-04-2023:14:54:01 |

**CR22-4528 - STATE V. CAROLINE BOYD-RUGGIERO (TN) (D3)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/4/2023 | P.D. APPOINTED TO REPRESENT DEFENDANT IF DEFT DEEMED INDIGENT - Transaction 9438998 - Approved By: NOREVIEW : 01-04-2023:14:54:28 |

**CR23-1345 - STATE V. DAMIEN MARS SILVANUS (TN) (D3)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/17/2023 | P.D. RELIEVED AS COUNSEL; APD APPOINTED; ARRAIGNMENT CONT'D TO 7/24/23 - Transaction 9777794 - Approved By: NOREVIEW : 07-17-2023:14:22:32 |

# Second Judicial District Court
## Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D4 = Hon. CONNIE STEINHEIMER
Date Range (Start = 1/1/2021 12:00:00AM End = 12/31/2021 12:00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR01-0874 - STATE VS. JEREMY MCCASKILL (D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/1/2021 | Transaction 8676777 - Approved By: NOREVIEW : 10-01-2021:11:08:17 |

**CR17-0854 - STATE VS CHRISTOPHER EDWIN KINDLER (TN)(D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/17/2021 | Transaction 8598823 - Approved By: NOREVIEW : 08-17-2021:10:07:18 |

**CR19-0051A - STATE VS. JEREMY W CHAPLIN (D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/17/2021 | ORDER APPOINTING CONFLICT COUNSEL - Transaction 8299560 - Approved By: NOREVIEW : 02-17-2021:15:46:22 |

**CR20-0211 - STATE VS. BRYAN EDWARD WATTHUBER (TN) (D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/13/2021 | - PD APPOINTED - Transaction 8642765 - Approved By: NOREVIEW : 09-13-2021:11:50:44 |

**CR20-0524 - STATE VS. RAUL ALCANTARA-BAHENA (TN)(D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/19/2021 | PD RELEIVED/APD APPOINTED/SETTING FORTH BRIEFING ON PLEADING REGARDING NOLO CONTENDERE PLEA - Transaction 8453607 - Approved By: NOREVIEW : 05-19-2021:14:54:43 |

**CR20-1609 - STATE VS. DANIEL PERRY GARRISON (TN)(D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/22/2021 | PD RELEIVED/APD APPOINTED - Transaction 8557780 - Approved By: NOREVIEW : 07-22-2021:17:25:07 |

**CR20-2727 - STATE VS. MORRIS DIONEL HAWKINS (TN)(D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/27/2021 | Transaction 8719197 - Approved By: NOREVIEW : 10-27-2021:12:55:01 |

**CR21-1570 - STATE VS. DEJHON ANTHONY MITCHELL (TN)(D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/23/2021 | Transaction 8661753 - Approved By: NOREVIEW : 09-23-2021:09:43:51 |

**CR97-2548 - STATE VS. TYREND MATTHEW GOINS (D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/13/2021 | DEFENDANT'S REQUEST FOR APPOINTMENT OF COUNSEL/REFERRED TO APPOINTED COUNSEL ADMINISTRATOR FOR SELECTION OF COUNSEL/MOTIONS TO CORRECT ILLEGAL SENTENCE AND/OR MODIFY SENTENCE FILED 10/10/2019 AND 10/15/2019 HELD IN ABEYANCE PENDING ADDITIONAL BRIEFING - Transaction 8245364 - Approved By: NOREVIEW : 01-13-2021:15:24:02 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/5/2021 | Transaction 8377906 - Approved By: NOREVIEW : 04-05-2021:14:16:30 |

# Second Judicial District Court
## Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D4 = Hon. CONNIE STEINHEIMER
Date Range (Start = 1/1/2022 12:00:00AM End = 12/31/2022 12:00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR00-1295 - STATE VS. BEAU E.Z. BROWN (D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/12/2022 | FOR LIMITED PURPOSES/MATTER REFERRED TO KRISTA MEIER FOR SELECTION OF COUNSEL - Transaction 9404182 - Approved By: NOREVIEW : 12-12-2022:10:54:25 |

**CR06-1467 - STATE VS ANTWON MAURICE BAYARD (D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/23/2022 | FOR PETITIONER ON THE AMENDED POST-CONVICTION REGARDING GENETIC MARKER ANALYSIS AND SETTING FORTH BRIEFING SCHEDULE - Transaction 8960162 - Approved By: NOREVIEW : 03-23-2022:09:26:48 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/12/2022 | Recommendation and Order Appointing Counsel (Post-Conviction) - Transaction 8994942 - Approved By: NOREVIEW : 04-12-2022:15:37:36 |

**CR11-1906 - STATE VS. BRIAN ROBERT HOBBS (D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/17/2022 | Recommendation and Order Appointing Counsel (Post-Conviction) - Transaction 9051924 - Approved By: NOREVIEW : 05-17-2022:11:26:21 |

**CR17-1241 - STATE VS. DIONDREA LAMAR PARKER (TN)(D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/23/2022 | Second Recommendation and Order Appointing Counsel (Post-Conviction) - Transaction 9276348 - Approved By: NOREVIEW : 09-23-2022:10:17:15 |

**CR19-0051B - STATE VS. MONTANA MUNDAY (D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/9/2022 | ORDER GRANTING MOTION TO WITHDRAW; STAYING CASES; AND APPOINTING THE ALTERNATE PUBLIC DEFENDER'S OFFICE AS TO DEFENDANT MUNDAY - Transaction 9093073 - Approved By: NOREVIEW : 06-09-2022:22:57:50 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/27/2022 | Recommendation and Order Appointing Counsel (Hourly Payment Approved) - Transaction 9119179 - Approved By: NOREVIEW : 06-27-2022:13:17:25 |

**CR19-1925 - STATE VS. JASON MARCUS JONES (D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/22/2022 | Recomendation and Order Appointing Counsel (Post-Conviction) - Transaction 9275573 - Approved By: NOREVIEW : 09-22-2022:17:05:14 |

**CR21-2181 - STATE VS. JEROME AUSTIN LINDESMITH (TN)(D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/2/2022 | - PD'S OFFICE FOR APPEAL PURPOSES - Transaction 9389416 - Approved By: NOREVIEW : 12-02-2022:11:30:21 |

# Second Judicial District Court
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**User Selected Criteria for this report:**
Judge ID = D4 = Hon. CONNIE STEINHEIMER
Date Range (Start = 1/1/2023 12:00:00AM End = 12/31/2023 12:00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR00-1295 - STATE VS. BEAU E.Z. BROWN (D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/9/2023 | Recommendation and Order Appointing Counsel (Post-Conviction) - Transaction 9445466 - Approved By: NOREVIEW : 01-09-2023:10:50:12 |

**CR01-0874 - STATE VS. JEREMY MCCASKILL (D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/9/2023 | Recommendation and Order Appointing Counsel (Post-Conviction) (ROBERT WIELAND, ESQ. APPOINTED)- Transaction 9445371 - Approved By: NOREVIEW : 01-09-2023:10:25:03 |

**CR17-0558 - STATE VS GREGORY WILLIAM JOHNSON (D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/11/2023 | ORDER APPOINTING PUBLIC DEFENDER - Transaction 9606662 - Approved By: NOREVIEW : 04-11-2023:14:39:24 |

**CR19-0051B - STATE VS. MONTANA MUNDAY (D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/9/2023 | Transaction 9822421 - Approved By: NOREVIEW : 08-09-2023:17:09:49 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/30/2023 | ORDER MAILED TO DEFT AT NNCC 8/14/23. KC<br>ORDER APPOINTING ALTERNATE COUNSEL - Transaction 9966576 - Approved By: NOREVIEW : 10-30-2023:11:31:32 |

**CR19-2014 - STATE VS. JASON MARCUS JONES (D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/10/2023 | ORDER GRANTING LEAVE TO PROCEED IN FORMA PAUPERIS AND ORDER TO APPOINT COUNSEL - Transaction 9659241 - Approved By: NOREVIEW : 05-10-2023:09:41:31 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/15/2023 | Recommendation and Order Appointing Counsel - Transaction 9667642 - Approved By: NOREVIEW : 05-15-2023:14:33:08 |

**CR20-3350 - STATE VS. THOMAS GREGORY SHEA (TN)(D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/28/2023 | Recommendation and Order Appointing Counsel - Transaction 9639290 - Approved By: NOREVIEW : 04-28-2023:10:16:05 |

**CR21-0870A - STATE VS. FABIAN BERNAL (D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/10/2023 | ORDER APPOINTING COUNSEL (WASHOE COUNTY PUBLIC DEFENDER) - Transaction 9762712 - Approved By: NOREVIEW : 07-10-2023:07:52:00 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/13/2023 | Recommendation and Order Appointing Counsel - Transaction 9771108 - Approved By: NOREVIEW : 07-13-2023:08:43:34 |

**CR22-1414 - STATE VS. ALEJANDRO RUIZ-CABRERA (TN)(D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/26/2023 | ORDER APPOINTING PD - Transaction 9964890 - Approved By: NOREVIEW : 10-26-2023:16:25:38<br>ORDER EMAILED TO PD EVELYN GROSENICK/CDPDJAMES LESLIE ON 10/26/23. KC |

**CR22-2228 - STATE VS. MATTHEW JAMES VANELZEN (TN)(D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/7/2023 | ORDER APPOINTING PD - Transaction 10036753 - Approved By: NOREVIEW : 12-07-2023:17:27:57<br>Order emailed to PD's office 12/7/23. kc |

**User Selected Criteria for this report:**
Judge ID = D4 = Hon. CONNIE STEINHEIMER
Date Range (Start = 1/1/2023 12:00:00AM End = 12/31/2023 12:00:00AM)
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**CR22-2490 - STATE VS. REGINALD LAMONT ELLIS, JR (TN)(D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/29/2023 | ORDER RELIEVING COUNSEL NEIDERT AND APPOINTING NEW CONFLICT COUNSEL - Transaction 9857559 - Approved By: NOREVIEW : 08-29-2023:15:39:20 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/14/2023 | Recommendation and Order Appointing Counsel - Transaction 9887228 - Approved By: NOREVIEW : 09-14-2023:15:11:33 |

**CR23-2510 - STATE VS KARL KIPLING KNIGHT, II (D4)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/20/2023 | ORDER APPOINTING APD - Transaction 10059070 - Approved By: NOREVIEW : 12-20-2023:15:19:07<br><br>ORDER EMAILED TO APD ON 12/20/23. KC |

# Second Judicial District Court
## Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D6 = Hon. LYNNE JONES
Date Range (Start = 1/1/2021 12:00:00AM End = 12/31/2021 12:00:00AM)
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**CR - CRIMINAL**

**CR06-2098 - STATE VS UBALDO URBINA-MALDONADO (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/5/2021 | Transaction 8581810 - Approved By: NOREVIEW : 08-05-2021:18:06:15 |

**CR15-0829 - STATE VS. FRANCISCO MERINO OJEDA (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/19/2021 | Transaction 8453017 - Approved By: NOREVIEW : 05-19-2021:12:27:12 |

**CR17-0173 - STATE VS GARY WILLIAM ROYER (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/14/2021 | CORRECTED ORDER - Transaction 8394340 - Approved By: NOREVIEW : 04-14-2021:11:14:54 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/14/2021 | Transaction 8394100 - Approved By: NOREVIEW : 04-14-2021:10:29:51 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/28/2021 | Transaction 8418607 - Approved By: NOREVIEW : 04-28-2021:15:19:43 |

**CR18-0403 - STATE VS TERRY LEE FOWLER II (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/21/2021 | 5/20/2021 Order Washoe County Public Defender - Transaction 8456788 - Approved By: NOREVIEW : 05-21-2021:06:23:48 |

**CR18-2026 - STATE VS. TERESA SUE OTERO (TN)(D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/12/2021 | Transaction 8242444 - Approved By: NOREVIEW : 01-12-2021:12:22:04 |

**CR18-2036 - STATE VS. JERED SPOTTEDBEAR (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/12/2021 | 3/11/2021 Motion for Probation Revocation - Transaction 8339060 - Approved By: NOREVIEW : 03-12-2021:05:55:07 |

**CR19-0341A - STATE VS. JENNIFER LEE BALDWIN (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/2/2021 | Transaction 8475674 - Approved By: NOREVIEW : 06-02-2021:16:12:28 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/28/2021 | Transaction 8566065 - Approved By: NOREVIEW : 07-28-2021:12:11:56 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/9/2021 | Transaction 8585187 - Approved By: NOREVIEW : 08-09-2021:13:00:35 |

**CR19-0341B - STATE VS. HERMAN ETHAN MATASAR (TN)(D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/19/2021 | Transaction 8350966 - Approved By: NOREVIEW : 03-19-2021:09:13:25 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/31/2021 | 5/27/2021 Status Hearing - Transaction 8470461 - Approved By: NOREVIEW : 05-31-2021:10:58:42 |

**CR19-3129 - CONS: STATE VS. ROBERTO MIGUEL TREVINO (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/19/2021 | 3/18/2021 Arraignment - Transaction 8350843 - Approved By: NOREVIEW : 03-19-2021:08:42:56 |

**CR20-0534A - STATE VS. DYLAN THOMAS FISHER (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/8/2021 | 1/7/2021 Motion to Withrawal - Transaction 8238534 - Approved By: NOREVIEW : 01-08-2021:16:16:19 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/18/2021 | Transaction 8301035 - Approved By: NOREVIEW : 02-18-2021:11:41:38 |

**User Selected Criteria for this report:**
Judge ID = D6 = Hon. LYNNE JONES
Date Range (Start = 1/1/2021 12:00:00AM End = 12/31/2021 12:00:00AM)
Docket Code(s) = 2715

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**CR21-0035 - STATE VS. COREY LEE GARDNER (TN) (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/12/2021 | Transaction 8592963 - Approved By: NOREVIEW : 08-12-2021:14:30:37 |

**CR21-0685 - STATE VS. KEON TREMAIN TAPLETT (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/8/2021 | 7/8/2021 Young Hearing - Transaction 8534650 - Approved By: NOREVIEW : 07-08-2021:20:54:33 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/8/2021 | 10/7/21 Young Hearing - Transaction 8687963 - Approved By: NOREVIEW : 10-08-2021:12:00:22 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/25/2021 | Transaction 8714361 - Approved By: NOREVIEW : 10-25-2021:12:46:16 |

**JO - OTHER JUSTICE COURT - CR**

**CR18-0273 - STATE VS BRAXTON CHEYANNE GARCIA (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/23/2021 | Transaction 8356722 - Approved By: NOREVIEW : 03-23-2021:13:56:25 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/13/2021 | Transaction 8393012 - Approved By: NOREVIEW : 04-13-2021:15:25:58 |

# Second Judicial District Court
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Judge D = D6 = Hon. LYNNE JONES
Date Range (Start = 1/1/2022 12:00:00AM End = 12/31/2022 12 00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR18-1787 - STATE VS. JAKE TAYLOR BELFORD (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/22/2022 | Second Recommendation and Order Appointing Counsel (Post-Conviction) - Transaction 9274985 - Approved By: NOREVIEW : 09-22-2022:14:33:37 |

**CR18-1790 - STATE VS. JAKE TAYLOR BELFORD (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/22/2022 | Second Recommendation and Order Appointing Counsel (Post-Conviction) - Transaction 9274997 - Approved By: NOREVIEW : 09-22-2022:14:35:07 |

**CR19-0341A - STATE VS. JENNIFER LEE BALDWIN (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/26/2022 | 1-26-2022 Mo ions Hearing - Transaction 8864946 - Approved By: NOREVIEW : 01-26-2022:21:17:11 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/18/2022 | Recommenda ion and Order Appointing Counsel (Second Attorney; Co-Counsel) - Transaction 8905554 - Approved By: NOREVIEW : 02-18-2022:10:54:54 |

**CR20-0417 - STATE VS. OSCAR ROLANDO REYES-CRUZ (TN)(D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/8/2022 | 8/4/2022 Sentencing - Transaction 9191871 - Approved By: NOREVIEW : 08-08-2022:08:19:31 |

**CR20-2713 - STATE VS. OSCAR ROLANDO REYES-CRUZ (TN)(D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/8/2022 | 8/4/2022 Sentencing - Transaction 9191863 - Approved By: NOREVIEW : 08-08-2022:08:18:36 |

**CR21-0674 - STATE VS. SERGIO HUGO ARIAS (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/11/2022 | 3/10/2022 Young Hearing - Transaction 8940780 - Approved By: NOREVIEW : 03-11-2022:10:36:59 |

**CR21-0685 - STATE VS. KEON TREMAIN TAPLETT (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/15/2022 | Order Appointing Counsel for Appeal - Transaction 9205269 - Approved By: NOREVIEW : 08-15-2022:12:58:15 |

**CR21-1201 - STATE VS. KENNETH DEAN LINDSAY II (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/22/2022 | 7/14/2022 Young Hearing - Motion for Bail Reduction - Transaction 9164109 - Approved By: NOREVIEW : 07-22-2022:10:35:33 |

**CR21-1417 - STATE VS. JESSE ALLEN BENNETT (TN) (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 11/4/2022 | 11/3/2022 Young Hearing - Transaction 9348408 - Approved By: NOREVIEW : 11-04-2022:17:14:51 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/2/2022 | Transaction 9389548 - Approved By: NOREVIEW : 12-02-2022:11:54:03 |

**CR21-1941A - STATE VS. KENNETH DEAN LINDSAY II (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/22/2022 | 7/14/2022 Young Hearing - Motion for Bail Reduction - Transaction 9163822 - Approved By: NOREVIEW : 07-22-2022:09 01:00 |

**CR21-3240 - STATE VS. DAVID LEON SWANSON (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/4/2022 | Recommenda ion and Order Appointing Counsel (Post-Conviction) - Transaction 8979945 - Approved By: NOREVIEW : 04-04-2022:14:36:50 |

**User Selected Criteria for this report**

Judge D = D6 = Hon. LYNNE JONES
Date Range (Start = 1/1/2022 12:00:00AM End = 12/31/2022 12 00:00AM)
Docket Code(s) = 2715

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**CR21-4380 - STATE VS. DARIUS MCARTHUR JONES (TN) (D6)**

Electronically Filed 2715 - Ord Appointing Counsel Filed On: 12/23/2022

12/21/22 Motion to Be Relieved as Counsel - Transaction 9424470 - Approved By: NOREVIEW : 12-23-2022:08:11:41

**CR22-0299B - STATE VS. ROSA MAJERCZYK (D6)**

Electronically Filed 2715 - Ord Appointing Counsel Filed On: 12/16/2022

12/15/2022: Arraignment - Transaction 9414195 - Approved By: NOREVIEW : 12-16-2022:12:24:00

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# Second Judicial District Court
## Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D6 = Hon. LYNNE JONES
Date Range (Start = 1/1/2023 12:00:00AM End = 12/31/2023 12:00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR18-1787 - STATE VS. JAKE TAYLOR BELFORD (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/19/2023 | Third Recommendation and Order Appointing Counsel - Transaction 9783687 - Approved By: NOREVIEW : 07-19-2023:15:32:14 |

**CR18-1790 - STATE VS. JAKE TAYLOR BELFORD (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/19/2023 | Third Recommendation and Order Appointing Counsel - Transaction 9783693 - Approved By: NOREVIEW : 07-19-2023:15:33:19 |

**CR19-0341A - STATE VS. JENNIFER LEE BALDWIN (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/19/2023 | Recommendation and Order Appointing Counsel - Transaction 9620964 - Approved By: NOREVIEW : 04-19-2023:10:10:13 |

**CR19-2883 - STATE VS. CARLOS CHRISTIAN CUEVAS, JR. (TN)(D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/18/2023 | 8/17/2023: Motion for Probation Revocation - Transaction 9839502 - Approved By: NOREVIEW : 08-18-2023:13:45:52 |

**CR19-3129 - CONS: STATE VS. ROBERTO MIGUEL TREVINO (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/24/2023 | Transaction 9850051 - Approved By: NOREVIEW : 08-24-2023:14:17:17 |

**CR20-1000B - STATE VS. JOHN MICKEY CASTRO (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/22/2023 | 9/20/2023 Sentencing - Transaction 9902655 - Approved By: NOREVIEW : 09-22-2023:13:14:54 |

**CR20-1237 - STATE VS. JAMI DANYEL ROWE (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/11/2023 | 8/9/2023: Status Hearing - Transaction 9826789 - Approved By: NOREVIEW : 08-11-2023:14:51:15 |

**CR20-1712 - STATE VS. JAIME OSEGUERA-VEGA (TN)(D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/23/2023 | 1/11/23 Young Hearing - Transaction 9469029 - Approved By: NOREVIEW : 01-23-2023:12:13:25<br>1/23/23 Order Appointing Counsel emailed to APD (mdc) |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/13/2023 | Recommendation and Order Appointing Counsel - Transaction 9506089 - Approved By: NOREVIEW : 02-13-2023:09:17:18 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/11/2023 | 8/10/2023: Sentencing - Transaction 9826531 - Approved By: NOREVIEW : 08-11-2023:14:05:48<br>8/11/23: Emailed filed copy to Holly Longe/CAA |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/18/2023 | Recommendation and Order Appointing Counsel - Transaction 9838672 - Approved By: NOREVIEW : 08-18-2023:10:39:27 |

**CR20-3167 - STATE VS. KALEO GIONSON (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/10/2023 | 2/9/2023: Motion to Withdraw as Counsel - ORDER APPOINTING WASHOE COUNTY PUBLIC DEFENDER - Transaction 9504592 - Approved By: NOREVIEW : 02-10-2023:12:02:13 |

**CR21-2855B - STATE VS. CHARLES Q. BEVANS (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/20/2023 | 2/16/23 Motion to Withdraw/Status Hearing - Transaction 9518033 - Approved By: NOREVIEW : 02-20-2023:09:02:28 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/15/2023 | Recommendation and Order Appointing Counsel - Transaction 9561926 - Approved By: NOREVIEW : 03-15-2023:16:29:18 |

**User Selected Criteria for this report:**
Judge ID = D6 = Hon. LYNNE JONES
Date Range (Start = 1/1/2023 12:00:00AM End = 12/31/2023 12:00:00AM)
Docket Code(s) = 2715

**CR22-0299A - STATE VS. JOSE JAVIER MAJERCZYK (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 11/17/2023 | 11/16/2023: Young Hearing - Transaction 10003580 - Approved By: NOREVIEW : 11-17-2023:15:57:24 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 11/28/2023 | 11/17/2023: Emailed filed copy of order to APD secretaries Recommendation and Order Appointing Counsel - Transaction 10017261 - Approved By: NOREVIEW : 11-28-2023:15:28:11 |

**CR22-1141 - STATE VS. AMANDA JEAN BRANSON (TN)(D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/19/2023 | 5/18/23 Motion to Confirm Trial - Order to Show Cause - Transaction 9677723 - Approved By: NOREVIEW : 05-19-2023:13:03:15 |

**CR22-3662B - STATE VS. KERRY MICHAEL WILLIAMS (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/5/2023 | Recommendation and Order Appointing Counsel - Transaction 9926838 - Approved By: NOREVIEW : 10-05-2023:16:25:09 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/5/2023 | 10/4/2023 Arraignment - Transaction 9925424 - Approved By: NOREVIEW : 10-05-2023:10:54:35 |

**CR23-0121 - STATE V. DANE JAMES BEERS (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/17/2023 | 3/15/23 Motion to Confirm - Transaction 9565044 - Approved By: NOREVIEW : 03-17-2023:10:51:18 |

**CR23-1209 - STATE V. ROBERT ADAM MCGUFFEY (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/22/2023 | 9/21/2023: Motion to be Relieved as Counsel - Transaction 9902673 - Approved By: NOREVIEW : 09-22-2023:13:23:54 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/5/2023 | 10/4/23 Young-Faretta Hearing - Transaction 9926258 - Approved By: NOREVIEW : 10-05-2023:14:28:49 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/5/2023 | Recommendation and Order Appointing Counsel - Transaction 9926290 - Approved By: NOREVIEW : 10-05-2023:14:36:56 |

**CR23-1309 - STATE V. THEODORE BEASSLEY (D6)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/18/2023 | 8/17/2023: Young Hearing - Transaction 9839491 - Approved By: NOREVIEW : 08-18-2023:13:44:08 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/13/2023 | 10/11/2023 Young Hearing - Transaction 9939604 - Approved By: NOREVIEW : 10-13-2023:09:48:28 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/24/2023 | Recommendation and Order Appointing Counsel - Transaction 9958155 - Approved By: NOREVIEW : 10-24-2023:10:07:31 |

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# Second Judicial District Court
## Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D7 = Hon. EGAN WALKER
Date Range (Start = 1/1/2021 12:00:00AM End = 12/31/2021 12:00:00AM)
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**CR - CRIMINAL**

**CR08-0121 - STATE VS. JUAN JOSE MEDINA-VEGA(TN)(D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/13/2021 | ACKNOWLEDGING ORDER OF REVERSAL AND REMAND; ORDER APPOINTING PUBLIC DEFENDER'S OFFICE; ORDER TO SET NEW SENTENCING HEARING - Transaction 8243924 - Approved By: NOREVIEW : 01-13-2021:09:17:04 |

**CR15-1558 - STATE VS. ORVILLE SAMUAL CURTIS (TN) (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/29/2021 | Transaction 8419623 - Approved By: NOREVIEW : 04-29-2021:09:24:37 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/3/2021 | Transaction 8478437 - Approved By: NOREVIEW : 06-03-2021:17:37:24 |

**CR16-0724 - STATE VS. JONATHAN ZURISDAY JARAMILLO (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/22/2021 | ORDER ACKNOWLEDGING REVERSAL AND REMAND; ORDER APPOINTING COUNSEL; ORDER DIRECTING STATE TO RESPOND - Transaction 8507626 - Approved By: NOREVIEW : 06-22-2021:15:23:26 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/8/2021 | Transaction 8533287 - Approved By: NOREVIEW : 07-08-2021:12:54:07 |

**CR16-1448 - STATE VS. LASHAE R. GALLON (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/28/2021 | Transaction 8418572 - Approved By: NOREVIEW : 04-28-2021:15:10:31 |

**CR17-0690A - STATE VS. KATHERINE DEE FLETCHER (TN)(D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/9/2021 | Transaction 8387052 - Approved By: NOREVIEW : 04-09-2021:10:07:12 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/28/2021 | Transaction 8418002 - Approved By: NOREVIEW : 04-28-2021:13:44:05 |

**CR17-1766 - STATE VS LUKE PATRICK MEDEIROS (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/24/2021 | Transaction 8309823 - Approved By: NOREVIEW : 02-24-2021:09:00:20 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/24/2021 | Transaction 8358540 - Approved By: NOREVIEW : 03-24-2021:11:45:12 |

**CR18-0177 - STATE VS JEFFERY LYNN FLUCKIGER (TN) (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/6/2021 | Transaction 8430948 - Approved By: NOREVIEW : 05-06-2021:10:28:17 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/17/2021 | Transaction 8599204 - Approved By: NOREVIEW : 08-17-2021:11:30:26 |

**CR18-1662A - STATE VS. STACIE LAOSHIE BOWERS (TN) (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 11/12/2021 | Transaction 8745634 - Approved By: NOREVIEW : 11-12-2021:07:35:28 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 11/23/2021 | Transaction 8763297 - Approved By: NOREVIEW : 11-23-2021:08:04:14 |

**CR18-1822 - STATE VS. CHEYANA JODY TRAVIS (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/3/2021 | Transaction 8778514 - Approved By: NOREVIEW : 12-03-2021:08:37:51 |

**CR19-2095 - STATE VS. ROBERT MICHAEL JOHNSON (D7)**

**User Selected Criteria for this report:**
Judge ID = D7 = Hon. EGAN WALKER
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Docket Code(s) = 2715

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/26/2021 | Transaction 8615368 - Approved By: NOREVIEW : 08-26-2021:08:49:55 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/27/2021 | Transaction 8719209 - Approved By: NOREVIEW : 10-27-2021:12:56:45 |

**CR19-2417 - STATE VS JACOB ANGELO MASSEY (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/21/2021 | Transaction 8459000 - Approved By: NOREVIEW : 05-21-2021:17:24:33 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/8/2021 | Transaction 8483984 - Approved By: NOREVIEW : 06-08-2021:10:00:38 |

**CR20-1805 - STATE VS. ROBERT LONNELL SMITH JR (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/2/2021 | Transaction 8776932 - Approved By: NOREVIEW : 12-02-2021:12:02:42 |

**CR20-2353 - STATE VS. JAYSON SCOTT GOADE (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/7/2021 | PUBLIC DEFENDER - Transaction 8481919 - Approved By: NOREVIEW : 06-07-2021:12:08:43 |

**CR20-2615 - STATE VS. RICK LEE SMITH (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/24/2021 | Transaction 8610060 - Approved By: NOREVIEW : 08-24-2021:06:55:42 |

# Second Judicial District Court
## Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D7 = Hon. EGAN WALKER
Date Range (Start = 1/1/2022 12:00:00AM End = 12/31/2022 12:00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR08-0121 - STATE VS. JUAN JOSE MEDINA-VEGA(TN)(D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/12/2022 | AND ORDER TO SET HEARING - Transaction 9253062 - Approved By: NOREVIEW : 09-12-2022:06:26:05 |

**CR16-0724 - STATE VS. JONATHAN ZURISDAY JARAMILLO (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/22/2022 | Second Recommendation and Order Appointing Counsel (Post-Conviction) - Transaction 9274882 - Approved By: NOREVIEW : 09-22-2022:14:10:45 |

**CR18-1822 - STATE VS. CHEYANA JODY TRAVIS (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/9/2022 | Transaction 8936493 - Approved By: NOREVIEW : 03-09-2022:13:10:47 |

**CR19-0990 - STATE VS. TIMOTHY JAMES TALAMANTE (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/20/2022 | Transaction 9418372 - Approved By: NOREVIEW : 12-20-2022:10:26:42 |

**CR19-2185 - STATE VS. CLAYTON DAVIS (TN) (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/23/2022 | FOR MATERIAL WITNESS BOBBY VERNON HOUSTON - Transaction 9220793 - Approved By: NOREVIEW : 08-23-2022:10:55:45 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/20/2022 | FOR LARISA RAYE JOE - Transaction 9269964 - Approved By: NOREVIEW : 09-20-2022:14:33:45 |

**CR19-3255 - STATE VS. JOHNATHAN SCOTT HANES (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/2/2022 | Transaction 9026069 - Approved By: NOREVIEW : 05-02-2022:08:04:22 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/16/2022 | Transaction 9413843 - Approved By: NOREVIEW : 12-16-2022:11:00:37 |

**CR20-0674A - STATE VS. ALDO MEZA-PINUELAS (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/25/2022 | Transaction 8915910 - Approved By: NOREVIEW : 02-25-2022:11:05:55 |

**CR20-1805 - STATE VS. ROBERT LONNELL SMITH JR (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/4/2022 | Transaction 8825800 - Approved By: NOREVIEW : 01-04-2022:16:08:54 |

**CR21-0078 - STATE VS. STRAHD VINCENT HAMM-JORDAN (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/5/2022 | Transaction 8827412 - Approved By: NOREVIEW : 01-05-2022:13:23:36 |

**CR21-0296 - CONS: STATE VS. JAMES BURR WHITE (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/16/2022 | APD'S OFFICE APPOINTED - Transaction 9209480 - Approved By: NOREVIEW : 08-16-2022:17:33:32 |

**CR21-0406 - ** consolidated into CR21-0296**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/16/2022 | APD'S OFFICE APPOINTED - Transaction 9209482 - Approved By: NOREVIEW : 08-16-2022:17:34:02 |

**CR21-4443 - STATE VS. PHILLIP SHAIN LAUB (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 11/3/2022 | PD'S OFFICE - Transaction 9343698 - Approved By: NOREVIEW : 11-03-2022:06:39:42 |

**User Selected Criteria for this report:**

Judge ID = D7 = Hon. EGAN WALKER
Date Range (Start = 1/1/2022 12:00:00AM End = 12/31/2022 12:00:00AM)
Docket Code(s) = 2715

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**CR22-1183 - STATE VS. ARAMISS JEREL MOORE (TN) (D7)**

Electronically Filed 2715 - Ord Appointing Counsel Filed On: 12/22/2022

APPOINTING APD - Transaction 9422465 - Approved By: NOREVIEW : 12-22-2022:10:17:09

**CR22-1734 - STATE VS. EVERETT WAYNE KENDELL (TN) (D7)**

Electronically Filed 2715 - Ord Appointing Counsel Filed On: 12/13/2022

Transaction 9406677 - Approved By: NOREVIEW : 12-13-2022:10:55:28

# Second Judicial District Court
## Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D7 = Hon. EGAN WALKER
Date Range (Start = 1/1/2023 12:00:00AM End = 12/31/2023 12:00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR12-1160 - STATE OF NEVADA VS. DVAUGHN KEITHAN KING (TN) (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/23/2023 | Transaction 9468053 - Approved By: NOREVIEW : 01-23-2023:08:16:23 |

**CR19-0990 - STATE VS. TIMOTHY JAMES TALAMANTE (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/23/2023 | Recommendation and Order Appointing Counsel - Transaction 9682950 - Approved By: NOREVIEW : 05-23-2023:11:18:00 |

**CR19-2924 - STATE VS. VERNON ERNEST MARTIN (TN) (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/12/2023 | Transaction 9937932 - Approved By: NOREVIEW : 10-12-2023:12:42:56 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/16/2023 | Recommendation and Order Appointing Counsel - Transaction 9943926 - Approved By: NOREVIEW : 10-16-2023:15:08:46 |

**CR20-3025 - STATE VS. DUANE ANDREW BALL (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 11/17/2023 | PD JORDAN DAVIS - Transaction 10001460 - Approved By: NOREVIEW : 11-17-2023:06:54:28 |

**CR20-4080A - STATE VS. DEWAYNE CALVIN ROBINSON JR (TN) (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/8/2023 | Transaction 9498603 - Approved By: NOREVIEW : 02-08-2023:10:14:57 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/10/2023 | Recommendation and Order Appointing Counsel - Transaction 9503765 - Approved By: NOREVIEW : 02-10-2023:08:53:35 |

**CR21-0078 - STATE VS. STRAHD VINCENT HAMM-JORDAN (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/26/2023 | Recommendation and Order Appointing Counsel - Transaction 9689889 - Approved By: NOREVIEW : 05-26-2023:09:32:48 |

**CR21-0270 - STATE VS. WAYNE ALLISON COPELAND (TN)(D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/9/2023 | Transaction 9550084 - Approved By: NOREVIEW : 03-09-2023:12:28:44 |

**CR21-0296 - CONS: STATE VS. JAMES BURR WHITE (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/11/2023 | Transaction 9451376 - Approved By: NOREVIEW : 01-11-2023:14:21:12 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/15/2023 | ORDER E-MAILED TO PAT MCGINNIS, ESQ. ON FEBRUARY 15, 2023 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/2/2023 | ORDER APPOINTING CONFLICT COUNSEL - Transaction 9538806 - Approved By: NOREVIEW : 03-02-2023:19:35:28 |

**CR21-0455 - STATE VS. ISAIAH ALEXANDER NORWOOD (TN) (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/30/2023 | Transaction 9586973 - Approved By: NOREVIEW : 03-30-2023:14:19:50 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/4/2023 | Recommendation and Order Appointing Counsel - Transaction 9592930 - Approved By: NOREVIEW : 04-04-2023:10:41:34 |

**CR21-4611 - STATE VS. JEREMY MARCEL CHATMAN (D7)(TN)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/14/2023 | Transaction 9886768 - Approved By: NOREVIEW : 09-14-2023:13:22:55 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/19/2023 | Recommendation and Order Appointing Counsel - Transaction 9894854 - Approved By: NOREVIEW : 09-19-2023:12:55:22 |

**CR22-0668A - STATE VS. ALAN SCOTT HANES (TN) (D7)**

**User Selected Criteria for this report:**
Judge ID = D7 = Hon. EGAN WALKER
Date Range (Start = 1/1/2023 12:00:00AM End = 12/31/2023 12:00:00AM)
Docket Code(s) = 2715

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/30/2023 | Transaction 9586985 - Approved By: NOREVIEW : 03-30-2023:14:22:52 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/3/2023 | RECOMMENDATION AND ORDER APPOINTING COUNSEL - Transaction 9592140 - Approved By: NOREVIEW : 04-03-2023:16:56:25 |

**CR22-1183 - STATE VS. ARAMISS JEREL MOORE (TN) (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/8/2023 | Transaction 9498606 - Approved By: NOREVIEW : 02-08-2023:10:15:38 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/7/2023 | Recommendation and Order Appointing Counsel - Transaction 9546225 - Approved By: NOREVIEW : 03-07-2023:17:40:31 |

**CR22-1734 - STATE VS. EVERETT WAYNE KENDELL (TN) (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/15/2023 | Transaction 9512575 - Approved By: NOREVIEW : 02-15-2023:15:19:10 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/21/2023 | Recommendation and Order Appointing Counsel - Transaction 9518611 - Approved By: NOREVIEW : 02-21-2023:09:34:40 |

**CR22-1951 - STATE VS. MATTHEW TIMOTHY CARTER (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/3/2023 | CONFLICT COUNSEL - Transaction 9434971 - Approved By: NOREVIEW : 01-03-2023:07:06:44 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/3/2023 | Recommendation and Order Appointing Counsel - Transaction 9491961 - Approved By: NOREVIEW : 02-03-2023:14:04:01 |

**CR23-1407A - STATE V. DAVID ACEVEDO (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/7/2023 | Transaction 10034396 - Approved By: NOREVIEW : 12-07-2023:10:13:28 |

**CR23-1407B - STATE V. LUIS ACEVEDO-PRADO (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/7/2023 | Transaction 10034391 - Approved By: NOREVIEW : 12-07-2023:10:12:37 |

**CR94-2264 - STATE VS. AVRAM NIKA (D7)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/30/2023 | AND ORDER SETTING HEARING - Transaction 9968102 - Approved By: NOREVIEW : 10-30-2023:16:15:06 |

Data Gathered On: 12/18/2023 at: 11:56:29AM

# Second Judicial District Court
## Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D8 = Hon. BARRY BRESLOW
Date Range (Start = 1/1/2021 12:00:00AM End = 12/31/2021 12:00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR09-1325 - STATE VS. WILLIAM JOSEPH MCCAFFREY (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/9/2021 | Transaction 8388253 - Approved By: NOREVIEW : 04-09-2021:14:48:57 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/7/2021 | Transaction 8632414 - Approved By: NOREVIEW : 09-07-2021:10:57:53 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/14/2021 | EDWARD REED ESQ Transaction 8645027 - Approved By: NOREVIEW : 09-14-2021:11:23:15 |

**CR18-0168 - STATE V. VICTOR MELENDEZ MONTELONGO (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/14/2021 | Transaction 8796348 - Approved By: NOREVIEW : 12-14-2021:12:58:09 |

**CR19-1589 - STATE VS CHRISTOPHER FAGAN (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/20/2021 | Transaction 8455194 - Approved By: NOREVIEW : 05-20-2021:11:12:05 |

**CR20-0942 - STATE VS. JOHN ARTHUR COE (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/18/2021 | WCPD RELIEVED. APD APPOINTED. - Transaction 8601746 - Approved By: NOREVIEW : 08-18-2021:11:12:19 |

**CR20-1003 - STATE VS. KHAYREE AMEEN SAAFIR (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/28/2021 | Transaction 8815593 - Approved By: NOREVIEW : 12-28-2021:11:33:24 |

**CR21-2340 - STATE VS. AARON DEMITRI JORDAN (TN) (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 11/2/2021 | Transaction 8727189 - Approved By: NOREVIEW : 11-02-2021:12:40:20 |

Data Gathered On: 12/18/2023 at: 12:11:49PM

# Second Judicial District Court
## Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D8 = Hon. BARRY BRESLOW
Date Range (Start = 1/1/2022 12:00:00AM End = 12/31/2022 12:00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR14-0644 - STATE VS. RODERICK STEPHEN SKINNER (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/28/2022 | Recommendation and Order Appointing Counsel (Post-Conviction) - Transaction 9122857 - Approved By: NOREVIEW : 06-28-2022:16:15:10 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/26/2022 | ORDER APPOINTING CONFLICT COUNSEL - Transaction 9332447 - Approved By: NOREVIEW : 10-26-2022:14:01:57 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 11/28/2022 | Second Recommendation and Order Appointing Counsel (Post-Conviction) - Transaction 9379093 - Approved By: NOREVIEW : 11-28-2022:09:41:34 |

**CR17-1753 - STATE VS ANDREW T CAMPBELL-MOSS (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 11/3/2022 | AND SETTING STATUS HEARING - Transaction 9345012 - Approved By: NOREVIEW : 11-03-2022:13:37:34 |

**CR18-0168 - STATE V. VICTOR MELENDEZ MONTELONGO (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/25/2022 | Recommendation and Order Appointing Counsel (Post-Conviction) - Transaction 8861464 - Approved By: NOREVIEW : 01-25-2022:14:44:40 |

**CR18-1839 - STATE VS. JEANETTE AYALA (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/20/2022 | Transaction 9009069 - Approved By: NOREVIEW : 04-20-2022:21:01:48 |

**CR19-1535B - STATE VS. STEWART EVANS HANDTE (TN) (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/31/2022 | Transaction 9338820 - Approved By: NOREVIEW : 10-31-2022:22:32:18 |

**CR19-3174 - STATE VS. RYAN NELSON (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/5/2022 | Transaction 8827413 - Approved By: NOREVIEW : 01-05-2022:13:24:17 |

**CR19-3219 - STATE VS. ALEXANDER ISREAL SANTIAGO (TN) (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/18/2022 | Transaction 9055588 - Approved By: NOREVIEW : 05-18-2022:16:35:53 |

**CR20-1003 - STATE VS. KHAYREE AMEEN SAAFIR (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/18/2022 | Transaction 8847207 - Approved By: NOREVIEW : 01-18-2022:10:26:23 |

**CR20-3822 - STATE VS. SAMUEL ARTHUR MOORE III (TN) (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/26/2022 | Transaction 9017919 - Approved By: NOREVIEW : 04-26-2022:13:50:31 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/1/2022 | Transaction 9238519 - Approved By: NOREVIEW : 09-01-2022:12:06:12 |

**CR21-0024B - STATE VS. JUAN MANUEL SANCHEZ-RAMIREZ (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/27/2022 | Transaction 9019622 - Approved By: NOREVIEW : 04-27-2022:11:46:13 |

**CR21-1798 - STATE VS. JUAN GONZALEZ (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/22/2022 | Transaction 9112441 - Approved By: NOREVIEW : 06-22-2022:13:52:32 |

**User Selected Criteria for this report:**

Judge ID = D8 = Hon. BARRY BRESLOW
Date Range (Start = 1/1/2022 12:00:00AM End = 12/31/2022 12:00:00AM)
Docket Code(s) = 2715

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**CR21-2603 - STATE VS. MAURICE JENNINGS, JR (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/26/2022 | ORDER APPOINTING THE APD OFFICE AND SETTING STATUS HEARING - Transaction 9229376 - Approved By: NOREVIEW : 08-26-2022:16:52:55<br>e-mailed to APD's office 8/29/22 - confirmed receipt. - ad |

**CR21-2967 - STATE VS. JUAN MANUEL SANCHEZ-RAMIREZ (TN(D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/27/2022 | Transaction 9019627 - Approved By: NOREVIEW : 04-27-2022:11:47:13 |

**CR22-2426 - STATE VS. DIEGO CHOLICO-LOPEZ (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 11/22/2022 | ORDER APPOINTING WCPD - Transaction 9376458 - Approved By: NOREVIEW : 11-22-2022:21:16:25 |

# Second Judicial District Court
# Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D8 = Hon. BARRY BRESLOW
Date Range (Start = 1/1/2023 12:00:00AM End = 12/31/2023 12:00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR14-0644 - STATE VS. RODERICK STEPHEN SKINNER (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/27/2023 | Transaction 9911272 - Approved By: NOREVIEW : 09-27-2023:14:07:11 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/3/2023 | Recommendation and Order Appointing Counsel - Transaction 9920110 - Approved By: NOREVIEW : 10-03-2023:09:37:35 |

**CR18-0427 - STATE VS KEITH WILLIAM SULLIVAN (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/19/2023 | Transaction 9677887 - Approved By: NOREVIEW : 05-19-2023:13:28:36 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/23/2023 | Recommendation and Order Appointing Counsel - Transaction 9683716 - Approved By: NOREVIEW : 05-23-2023:13:56:26 |

**CR19-1128 - STATE VS. JOSE ALEJANDRO FIGUEROA (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/22/2023 | Recommendation and Order Appointing Counsel - Transaction 9902069 - Approved By: NOREVIEW : 09-22-2023:10:33:31 |

**CR19-1479 - STATE VS. DARRELL WAYNE BALDWIN, II (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/21/2023 | Transaction 9627385 - Approved By: NOREVIEW : 04-21-2023:14:29:24 |

**CR19-1535A - STATE VS. ROGER EUGENE HILLYGUS (TN) (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/17/2023 | ORD APPOINTING COUNSEL AND SETTING STATUS HEARING - Transaction 9458925 - Approved By: NOREVIEW : 01-17-2023:13:57:55 |

**CR19-1535B - STATE VS. STEWART EVANS HANDTE (TN) (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/17/2023 | ORD APPOINTING COUNSEL AND SETTING STATUS HEARING - Transaction 9458926 - Approved By: NOREVIEW : 01-17-2023:13:58:26 |

**CR19-1909 - STATE VS. JEFFREY MICHAEL RICHARDS (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/29/2023 | ORD GRANTING PETITIONER'S MTN TO APPOINT COUNSEL - Transaction 10071428 - Approved By: NOREVIEW : 12-29-2023:09:13:34 |

**CR20-3240 - STATE VS. JUAN DANIEL SALDATE-SOLTERO (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/20/2023 | Transaction 10059311 - Approved By: NOREVIEW : 12-20-2023:16:07:27 |

**CR21-0024A - STATE VS. JUAN MANUEL LOPEZ-LEYVA (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/3/2023 | ORDER APPOINTING CONFLICT COUNSEL - Transaction 9539837 - Approved By: NOREVIEW : 03-03-2023:12:52:28 |
| | | | ord e-mailed to conflict group 3/3/23 - ad |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/6/2023 | Transaction 9541802 - Approved By: NOREVIEW : 03-06-2023:11:34:18 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/6/2023 | ORD APPOINTING COUNSEL RE GUILLEN-RODRIGUEZ - Transaction 10033101 - Approved By: NOREVIEW : 12-06-2023:14:12:19 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/8/2023 | ORD APPOINTING COUNSEL RE GALLEGOS ALVAREZ - Transaction 10038589 - Approved By: NOREVIEW : 12-08-2023:14:49:39 |

**User Selected Criteria for this report:**
Judge ID = D8 = Hon. BARRY BRESLOW
Date Range (Start = 1/1/2023 12:00:00AM End = 12/31/2023 12:00:00AM)
Docket Code(s) = 2715

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**CR21-0024B - STATE VS. JUAN MANUEL SANCHEZ-RAMIREZ (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/6/2023 | ORD APPOINTING COUNSEL RE GUILLEN-RODRIGUEZ - Transaction 10033103 - Approved By: NOREVIEW : 12-06-2023:14:12:38 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/8/2023 | ORD APPOINTING COUNSEL RE GALLEGOS ALVAREZ - Transaction 10038597 - Approved By: NOREVIEW : 12-08-2023:14:50:43 |

**CR21-0647 - STATE VS. KATRINA GABRIELLE CARVALHO (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/9/2023 | ORDER APPOINTING CONFLICT COUNSEL - Transaction 9502546 - Approved By: NOREVIEW : 02-09-2023:14:47:32 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/13/2023 | order e-mailed to the conflict group 2/10/23 - ad Recommendation and Order Appointing Counsel - Transaction 9506562 - Approved By: NOREVIEW : 02-13-2023:10:34:55 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/6/2023 | Recommendation and Order Appointing Counsel - Transaction 9757819 - Approved By: NOREVIEW : 07-06-2023:09:31:39 |

**CR21-2603 - STATE VS. MAURICE JENNINGS, JR (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/17/2023 | ORDER APPOINTING CONFLICT COUNSEL - Transaction 9673471 - Approved By: NOREVIEW : 05-17-2023:17:04:58 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/22/2023 | order e-mailed to conflict group 5/17/23 - ad Recommendation and Order Appointing Counsel - Transaction 9680501 - Approved By: NOREVIEW : 05-22-2023:14:24:18 |

**CR22-3369 - STATE VS. ANTHONY HAYWOOD WILSON (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/14/2023 | Transaction 9774322 - Approved By: NOREVIEW : 07-14-2023:11:03:31 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/19/2023 | order e-mailed to the conflict counsel administrator 7/17/23 - ad Recommendation and Order Appointing Counsel - Transaction 9782793 - Approved By: NOREVIEW : 07-19-2023:12:43:01 |

**CR23-2533 - STATE VS. LONNIE TERRELL HAWKINS (D8)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/15/2023 | APD RELIEVED - CONFLICT COUNSEL ASSIGNED - Transaction 10050423 - Approved By: NOREVIEW : 12-15-2023:10:37:17 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/19/2023 | Recommendation and Order Appointing Counsel - Transaction 10056646 - Approved By: NOREVIEW : 12-19-2023:14:56:50 |

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# Second Judicial District Court
## Docket Lookup Report

**User Selected Criteria for this report**
Judge D = D9 = Hon. SCOTT FREEMAN
Date Range (Start = 1/1/2021 12:00:00AM End = 12/31/2021 12 00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR17-1370 - STATE VS. JIM HWA CHEN (D9)**
Electronically Filed 2715 - Ord Appointing Counsel Filed On: 4/1/2021
Transaction 8372670 - Approved By: NOREVIEW : 04-01-2021:11:12:37

**CR18-1654 - STATE VS LUIGY RICHARD LOPEZ-DELGADO (TN)(D9)**
Electronically Filed 2715 - Ord Appointing Counsel Filed On: 2/24/2021
Transaction 8309699 - Approved By: NOREVIEW : 02-24-2021:08:27:52

**CR18-1709 - STATE VS. DONTAY THOR SEVIER (D9)**
Electronically Filed 2715 - Ord Appointing Counsel Filed On: 11/16/2021
Transaction 8752005 - Approved By: NOREVIEW : 11-16-2021:13:23:08

**CR19-0799 - STATE VS. RAQUEL DANYALE REYMERS (D9)**
Electronically Filed 2715 - Ord Appointing Counsel Filed On: 8/12/2021
ORDER RELIEVING THE PUBLIC DEFENDER AS ATTORNEY OF RECORD - Transaction 8592604 - Approved By: NOREVIEW : 08-12-2021:13 01:57

**CR20-1587B - STATE VS. CARLOS ALBERTO ORTIZ-RAMIREZ (TN) (D9)**
Electronically Filed 2715 - Ord Appointing Counsel Filed On: 8/27/2021
Transaction 8619264 - Approved By: NOREVIEW : 08-27-2021:18:38:45

**CR21-0350 - STATE VS. GIOVANNI GONZALES-MARISCAL (TN)(D9)**
Electronically Filed 2715 - Ord Appointing Counsel Filed On: 12/8/2021
Transaction 8787170 - Approved By: NOREVIEW : 12-08-2021:13 55:57

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# Second Judicial District Court
## Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D9 = Hon. SCOTT FREEMAN
Date Range (Start = 1/1/2022 12:00:00AM End = 12/31/2022 12:00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR14-0118 - STATE VS. AMADEO SANCHEZ JR (D9)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 11/18/2022 | Second Order to Appoint Counsel - Transaction 9369850 - Approved By: NOREVIEW : 11-18-2022:10:03:24 |

**CR19-1946 - STATE VS. MICHAEL JAMES MCKEE (D9)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/28/2022 | Transaction 9122879 - Approved By: NOREVIEW : 06-28-2022:16:19:06 |

**CR21-0675 - STATE VS. CRYSTAL MARIE SASHINGER (TN) (D9)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/15/2022 | ORDER APPOINTING CONFLICT COUNSEL - Transaction 9001961 - Approved By: NOREVIEW : 04-15-2022:15:58:39 |

**CR21-4134 - STATE VS. GEORGE MICHAEL CLAROS (D9)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/28/2022 | Recommendation and Order Appointing New Counsel - Transaction 9430187 - Approved By: NOREVIEW : 12-28-2022:14:36:43 |

**CR22-1850 - STATE VS. JAVIER ANGEL SALDANA (TN)(D9)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/25/2022 | ORDER APPOINTING CONFLICT COUNSEL - Transaction 9330974 - Approved By: NOREVIEW : 10-25-2022:17:24:28 |

# Second Judicial District Court
## Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D9 = Hon. SCOTT FREEMAN
Date Range (Start = 1/1/2023 12:00:00AM End = 12/31/2023 12:00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR19-2870A - STATE VS. SMILEY ALAN MARTIN, III (D9)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/30/2023 | Transaction 9587094 - Approved By: NOREVIEW : 03-30-2023:14:48:01 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/4/2023 | Transaction 9649788 - Approved By: NOREVIEW : 05-04-2023:12:07:21 |

**CR21-4134 - STATE VS. GEORGE MICHAEL CLAROS (D9)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/23/2023 | ORDER (1) GRANTING WITHDRAWAL OF ATTORNEY; (2) ORDER APPOINTING COUNSEL; AND, (3) ORDER SETTING HEARING - Transaction 9684427 - Approved By: NOREVIEW : 05-23-2023:16:25:28 |

**CR22-1850 - STATE VS. JAVIER ANGEL SALDANA (TN)(D9)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/9/2023 | ORDER GRANTING WITHDRAWAL OF ALTERNATE P.D. AND APPOINTING CONFLICT COUNSEL - Transaction 9713921 - Approved By: NOREVIEW : 06-09-2023:09:38:55 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/16/2023 | Recommendation and Order Appointing Counsel - Transaction 9726540 - Approved By: NOREVIEW : 06-16-2023:09:19:27 |

**CR22-2890 - STATE VS. EDWARD STROUGHTER, JR (D9)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/4/2023 | Transaction 9649792 - Approved By: NOREVIEW : 05-04-2023:12:08:39 |

**CR22-3041 - STATE VS. KAMERON TANNER PLANTS (D9)(TN)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/28/2023 | Transaction 9746949 - Approved By: NOREVIEW : 06-28-2023:15:04:42 |

**CR23-0437 - STATE V. RICHARD LAWRENCE (D9)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/20/2023 | Recommendation and Order Appointing Counsel - Transaction 9729848 - Approved By: NOREVIEW : 06-20-2023: 11:07:44 |

**CR23-2662 - STATE VS MARIO FERTINI, JR. (TN) (D9)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 11/14/2023 | Recommendation and Order Appointing Counsel - Transaction 9995103 - Approved By: NOREVIEW : 11-14-2023:14:52:20 |

# Second Judicial District Court
# Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D10 = Hon. KATHLEEN SIGURDSON
Date Range (Start = 1/1/2021 12:00:00AM End = 12/31/2021 12:00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR18-1874 - STATE VS. RYAN ROBERT STOTTLE (TN) (D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/31/2021 | Transaction 8723467 - Approved By: NOREVIEW : 10-31-2021:16:54:38 |

**CR19-1064 - STATE VS. RYAN ROBERT STOTTLE (TN) (D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/31/2021 | Transaction 8723469 - Approved By: NOREVIEW : 10-31-2021:16:55:30 |

**CR19-1141 - STATE VS. ANGEL ISAIAS MOYA (D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/3/2021 | Transaction 8324017 - Approved By: NOREVIEW : 03-03-2021:15:41:05 |

**CR19-1974 - STATE VS. DANIEL REYES-SOLIS (TN) (D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/29/2021 | Washoe County Public Defender?s Office is appointed to represent the Defendant. - Transaction 8269438 - Approved By: NOREVIEW : 01-29-2021:08:22:37 |

**CR19-2503 - STATE VS. JOSHUA SHANE TYLER JONES (TN) (D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/13/2021 | Transaction 8245857 - Approved By: NOREVIEW : 01-13-2021:17:39:17 |

**CR20-0285 - STATE VS. DANIEL REYES-SOLIS (TN) (D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/29/2021 | Washoe County Public Defender?s Office is appointed to represent the Defendant. - Transaction 8269433 - Approved By: NOREVIEW : 01-29-2021:08:21:26 |

**CR20-2580 - STATE VS. DAVID SCOTT TONDREAU (TN) (D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/27/2021 | ORDER RELIEVING PUBLIC DEFENDER'S OFFICE AND APPOINTING ALTERNATE PUBLIC DEFENDER'S OFFICE - Transaction 8266548 - Approved By: NOREVIEW : 01-27-2021:16:46:47 |

**CR21-0178 - STATE VS. BENYAMIN SMITH (TN)(D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/7/2021 | ORDER RELIEVING PUBLIC DEFENDER'S OFFICE AND APPOINTING ALTERNATE PUBLIC DEFENDER'S OFFICE - Transaction 8532138 - Approved By: NOREVIEW : 07-07-2021:17:32:50 |

# Second Judicial District Court
## Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D10 = Hon. KATHLEEN SIGURDSON
Date Range (Start = 1/1/2022 12:00:00AM End = 12/31/2022 12:00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR17-0170 - STATE VS. KRISTIAN HEINZ WALTERS (TN)(D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/30/2022 | Recommendation and ORder Appointing Counsel (Post-Conviction) - Transaction 9127112 - Approved By: NOREVIEW : 06-30-2022:14:30:25 |

**CR17-1685 - STATE VS. KRISTIAN HEINZ WALTERS (D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/30/2022 | Recommendation and Order Appointing Counsel (Post-Conviction) - Transaction 9127116 - Approved By: NOREVIEW : 06-30-2022:14:31:45 |

**CR17-1688 - STATE VS. KRISTIAN HEINZ WALTERS (D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/30/2022 | Recommendation and Order Appointing Counsel (Post-Conviction) - Transaction 9127119 - Approved By: NOREVIEW : 06-30-2022:14:32:35 |

**CR17-1689 - STATE VS. KRISTIAN HEINZ WALTERS (D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/30/2022 | Recommendation and Order Appointing Counsel (Post-Conviction) - Transaction 9127122 - Approved By: NOREVIEW : 06-30-2022:14:33:37 |

**CR20-1056 - STATE VS. MICHAEL JOSEPH MARQUEZ (TN)(D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/29/2022 | Transaction 9024786 - Approved By: NOREVIEW : 04-29-2022:13:29:44 |

**CR20-2235 - STATE VS. BRIAN JAMES BANDY (TN) (D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/18/2022 | Washoe County Alternate Public Defender?s Office be appointed to represent Mr. Bandy in this matter. - Transaction 9055678 - Approved By: NOREVIEW : 05-18-2022:17:00:09 |

**CR20-3193 - STATE VS. SABINO VIDAL ROSALES (TN)(D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/10/2022 | Washoe County Public Defender?s Office is appointed to represent the Defendant should he be unable to retain private counsel. - Transaction 8833868 - Approved By: NOREVIEW : 01-10-2022:08:07:07 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/7/2022 | Transaction 8883300 - Approved By: NOREVIEW : 02-07-2022:09:32:27 |

**CR21-1085 - STATE VS. NATHAN ELI RAMIREZ (TN)(D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/11/2022 | Transaction 9141973 - Approved By: NOREVIEW : 07-11-2022:15:16:22 |

**CR21-4017 - STATE VS. ANDREAS GABRIEL YESCAS SR (TN)(D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/24/2022 | ORDER GRANTING MOTION TO WITHDRAW ADN APPOINTING NEW COUNSEL - Transaction 9327327 - Approved By: NOREVIEW : 10-24-2022:12:36:02 |

**CR22-0218 - STATE VS. JOSE JAIRO MARTINEZ-PEREZ (TN) (D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/11/2022 | Washoe County Alternate Public Defender?s Office be appointed to represent Mr. Martinez-Perez - Transaction 9044171 - Approved By: NOREVIEW : 05-11-2022:19:15:39 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/27/2022 | Transaction 9280992 - Approved By: NOREVIEW : 09-27-2022:08:16:41 |

**User Selected Criteria for this report:**

Judge ID = D10 = Hon. KATHLEEN SIGURDSON
Date Range (Start = 1/1/2022 12:00:00AM End = 12/31/2022 12:00:00AM)
Docket Code(s) = 2715

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**CR22-1130 - STATE VS. FOLAJI OLADIMEJI AKINBAYODE (TN)(D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/6/2022 | ORDER APPOINTING ALTERNATE PUBLIC DEFENDER - Transaction 9135344 - Approved By: NOREVIEW : 07-06-2022:17:00:30 |

**CR22-1148 - STATE VS. ARBYN ABEL FLORES (TN)(D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/29/2022 | Transaction 9024795 - Approved By: NOREVIEW : 04-29-2022:13:34:05 |

**CR22-1314B - STATE VS. WILLIAM CATO SELLS (TN)(D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 11/23/2022 | Transaction 9377927 - Approved By: NOREVIEW : 11-23-2022:14:57:04 |

**CR22-1341 - STATE VS. RICARDO PACHECO-MARQUEZ (TN)(D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/5/2022 | ORDER APPOINTING PUBLIC DEFENDER - Transaction 9132730 - Approved By: NOREVIEW : 07-05-2022:18:09:06 |

# Second Judicial District Court
## Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D10 = Hon. KATHLEEN SIGURDSON
Date Range (Start = 1/1/2023 12:00:00AM End = 12/31/2023 12:00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR20-1761 - STATE VS. THOMAS JOSEPH BALBONI JR. (D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 11/7/2023 | ORDER RELIEVING COUNSEL AND APPOINTING NEW COUNSEL WITH CERTIFICATE OF SERVICE - Transaction 9982400 - Approved By: NOREVIEW : 11-07-2023:11:22:30 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 11/8/2023 | Recommendation and Order Appointing Counsel - Transaction 9987096 - Approved By: NOREVIEW : 11-08-2023:17:10:28 |

**CR20-3193 - STATE VS. SABINO VIDAL ROSALES (TN)(D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/23/2023 | ORDER APPOINTING COUNSEL (APPELLATE) - Transaction 9955392 - Approved By: NOREVIEW : 10-23-2023:10:28:20 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/30/2023 | Recommendation and Order Appointing Counsel - Transaction 9965886 - Approved By: NOREVIEW : 10-30-2023:09:07:28 |

**CR20-4040 - STATE VS. MICHAEL ANDREW WHALIN (TN)(D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 2/16/2023 | Transaction 9515074 - Approved By: NOREVIEW : 02-16-2023:15:09:55 |

**CR21-1412 - STATE VS. ROBERT MICHAEL JARAB (TN)(D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/25/2023 | ORDER RELIEVING COUNSEL AND APPOINTING NEW COUNSEL - Transaction 9794033 - Approved By: NOREVIEW : 07-25-2023:15:46:15 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 7/26/2023 | Recommendation and Order Appointing Counsel - Transaction 9795370 - Approved By: NOREVIEW : 07-26-2023:12:00:18 |

**CR21-3548 - STATE VS. AUSTIN TYLER BERNAL (TN)(D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 11/7/2023 | ORDER APPOINTING COUNSEL WITH CERTIFICATE OF SERVICE - Transaction 9982322 - Approved By: NOREVIEW : 11-07-2023:11:08:04 |

**CR22-0218 - STATE VS. JOSE JAIRO MARTINEZ-PEREZ (TN) (D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/4/2023 | Recommendation and Order Appointing New Counsel - Transaction 9439019 - Approved By: NOREVIEW : 01-04-2023:14:58:14 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/21/2023 | Recommendation and Order Appointing Counsel - Transaction 9732737 - Approved By: NOREVIEW : 06-21-2023:10:47:09 |

**CR22-2955 - STATE VS. JAMAINE LEE GLOVER (TN)(D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/22/2023 | ORDER RELIEVING COUNSEL AND APPOINTING NEW COUNSEL - Transaction 9844228 - Approved By: NOREVIEW : 08-22-2023:11:57:08 |

**CR22-3097 - STATE VS. KYLE TIMOTHY BUSH (TN)(D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/10/2023 | ORDER RELIEVING COUNSEL AND APPOINTING NEW COUNSEL - Transaction 9660051 - Approved By: NOREVIEW : 05-10-2023:13:25:46 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/16/2023 | Recommendation and Order Appointing Counsel - Transaction 9668797 - Approved By: NOREVIEW : 05-16-2023:10:05:15 |

**CR23-0113 - STATE V. PENISIMANI ULUI TAUNAHOLO (TN)(D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/6/2023 | ORDER RELIEVING COUNSEL AND APPOINTING NEW COUNSEL - Transaction 9815054 - Approved By: NOREVIEW : 08-06-2023:14:55:05 |

**User Selected Criteria for this report:**
Judge ID = D10 = Hon. KATHLEEN SIGURDSON
Date Range (Start = 1/1/2023 12:00:00AM End = 12/31/2023 12:00:00AM)
Docket Code(s) = 2715

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| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/8/2023 | Recommendation and Order Appointing Counsel - Transaction 9818483 - Approved By: NOREVIEW : 08-08-2023:11:51:29 |

**CR23-0188 - STATE V. JUAN OCTAVIO CABRERA-BONILLA (TN)(D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/20/2023 | Transaction 9896937 - Approved By: NOREVIEW : 09-20-2023:10:43:08 |

**CR23-1351 - STATE VS. ROBERTO GUERRERO-GAMEZ (TN)(D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/14/2023 | ORDER RELIEVING COUNSEL AND APPOINTING NEW COUNSEL AND REVOKING BAIL WITH CERTIFICATE OF SERVICE - Transaction 9886602 - Approved By: NOREVIEW : 09-14-2023:12:54:47 |

**CR23-1688 - STATE V. LADON MILTON JONES (D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 11/14/2023 | Transaction 9995400 - Approved By: NOREVIEW : 11-14-2023:15:48:12 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 11/17/2023 | Recommendation and Order Appointing Counsel - Transaction 10002898 - Approved By: NOREVIEW : 11-17-2023:13:55:34 |

**CR23-2866 - STATE VS. ISRAEL ALFREDO OCONITRILLO(TN)(D10)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/28/2023 | Transaction 10069485 - Approved By: NOREVIEW : 12-28-2023:11:11:15 |



# Second Judicial District Court
# Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D15 = Hon. DAVID HARDY
Date Range (Start = 1/1/2022 12:00:00AM End = 12/31/2022 12:00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR19-0083 - STATE VS. KENNETH EARL DAVIS (D15)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 9/22/2022 | Recommendation and Order Appointing Counsel (Post-Conviction) - Transaction 9275013 - Approved By: NOREVIEW : 09-22-2022:14:38:06 |

**CR20-1889 - STATE VS. TYLER MINER MATHERS (TN) (D15)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/9/2022 | Transaction 8935936 - Approved By: NOREVIEW : 03-09-2022:11:28:01 |

**CR20-2511 - STATE VS. TYLER MINER MATHERS (TN) (D15)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 3/9/2022 | Transaction 8935946 - Approved By: NOREVIEW : 03-09-2022:11:28:37 |

# Second Judicial District Court
## Docket Lookup Report

**User Selected Criteria for this report**
Judge D = D15 = Hon. DAVID HARDY
Date Range (Start = 1/1/2021 12:00:00AM End = 12/31/2021 12 00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR10-0884 - STATE VS. JOY COLLEEN LANGAN (TN)(D15)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/5/2021 | Transaction 8681338 - Approved By: NOREVIEW : 10-05-2021:11:10:43 |

**CR18-0594 - STATE VS MICHAEL WHITFIELD (TN) (D15)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/6/2021 | REFERRING TO ACA KRISTA MEIER - Transaction 8432256 - Approved By: NOREVIEW : 05-06-2021:15:50:49 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 6/8/2021 | Transaction 8483949 - Approved By: NOREVIEW : 06-08-2021:09 54:11 |

**CR18-1135B - STATE VS RICHARD ABDIEL SILVA (D15)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 4/12/2021 | ORDER REFERRING TO ACA FOR APPOINTMENT OF COUNSEL - Transaction 8390289 - Approved By: NOREVIEW : 04-12-2021:14:00:45 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 5/4/2021 | Transaction 8426648 - Approved By: NOREVIEW : 05-04-2021:12 08:54 |

**CR19-0999 - STATE VS. RALPH EDMOND GOAD (D15)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/22/2021 | ORDER RELIEVING THE PD'S OFFICE AND APPOINTING THE APD'S OFFICE TO REPRESENT THE DEFENDANT. - Transaction 8712729 - Approved By: NOREVIEW : 10-22-2021:15:21:40 |

**CR20-3866A - STATE VS. NICOLE WENGERT (TN) (D15)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 1/13/2021 | ORDER RELIEVING PD'S OFFICE AND APPOINTING APD'S OFFICE - Transaction 8243885 - Approved By: NOREVIEW : 01-13-2021:09 06:26 |

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# Second Judicial District Court
# Docket Lookup Report

**User Selected Criteria for this report:**
Judge ID = D15 = Hon. DAVID HARDY
Date Range (Start = 1/1/2023 12:00:00AM End = 12/31/2023 12:00:00AM)
Docket Code(s) = 2715

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**CR - CRIMINAL**

**CR19-0083 - STATE VS. KENNETH EARL DAVIS (D15)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/6/2023 | Recommendation and Order Appointing Counsel (Post-Conviction) - Transaction 10032370 - Approved By: NOREVIEW : 12-06-2023:11:12:11 |

**CR21-2402 - STATE VS. ASHLEY PADILLA (TN)(D15)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/29/2023 | Transaction 9855978 - Approved By: NOREVIEW : 08-29-2023:10:01:33 |

**CR22-2580 - STATE VS. DOMINIC RENTERIA (TN)(D15)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/25/2023 | Recommendation and Order Appointing Counsel - Transaction 9852261 - Approved By: NOREVIEW : 08-25-2023:13:43:19 |

**CR22-2994 - STATE VS. CORNELIUS THOMAS (TN)(D15)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/29/2023 | ORDER APPOINTING COUNSEL FOR EVIDENTIARY HEARING - Transaction 9855973 - Approved By: NOREVIEW : 08-29-2023:10:00:49 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 8/31/2023 | Recommendation and Order Appointing Counsel - Transaction 9861075 - Approved By: NOREVIEW : 08-31-2023: 11:01:52 |
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/4/2023 | Recommendation and Order Appointing Counsel - Transaction 10027316 - Approved By: NOREVIEW : 12-04-2023:13:23:08 |

**CR22-3409 - STATE VS. KEITH WATKINS (D15)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/16/2023 | ORDER TEMPORARILY SUSPENDING COUNSEL DAVIES' REPRESENTATION OF THE DEFENDANT AND APPOINTING THE WCPD'S OFFICE. - Transaction 9942339 - Approved By: NOREVIEW : 10-16-2023:10:30:43 |

**CR23-0934 - STATE V. NICHOLAS MARCOS-ISIDORO (TN)(D15)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 10/30/2023 | ORDER GRANTING COUNSEL STROMENGER'S MOTION TO WITHDRAW AND APPOINTING THE WASHOE COUNTY PUBLIC DEFENDER'S OFFICE - Transaction 9967757 - Approved By: NOREVIEW : 10-30-2023:15:16:13 |

**CR23-2504 - STATE VS. MIGUEL ACUNA, JR. (TN)(D15)**

| | | | |
|---|---|---|---|
| Electronically Filed | 2715 - Ord Appointing Counsel | Filed On: 12/12/2023 | ORDER RELIEVING THE PD'S OFFICE AND APPOINTING THE APD'S OFFICE TO REPRESENT THE DEFENDANT. - Transaction 10042508 - Approved By: NOREVIEW : 12-12-2023:10:58:06 |

# SECOND JUDICIAL DISTRICT COURT
## STATE OF NEVADA
## WASHOE COUNTY

**COURT ADMINISTRATOR/CLERK OF COURT**
Alicia Lerud, Esq.

**ASSISTANT COURT ADMINISTRATOR**
Emily Reed, Esq.

**75 COURT STREET**
**RENO, NEVADA 89501**
**www.washoecourts.com**
**T: (775) 328-3194**
**F: (775) 328-3206**

April 9, 2026

Beau Brown, [redacted]

Mr. Brown:

This communication is in response to your correspondence dated March 26, 2026 and received on April 6, 2026 (copy is enclosed herewith). You are seeking information and documentation pertaining to the "removal or reassignment of Judge Connie J. Steinheimer".

Responses to your requests are as follows:

1. *Copies of any Administrative Orders, communications, memoranda, or directives regarding removal or reassignment of Judge Connie J. Steinheimer from case assignments in the Second Judicial District Court issued in 2026*

Enclosed please find a copy of Administrative Order 2026-08.

2. *Department 4 case reassignment orders*

Enclosed please find copies of Order Transferring Cases filed in the below-referenced matters:

- CR25-1108A
- CR25-1108B
- CR24-1957
- CR24-2893
- CR24-2214

3. *Docket transfer notices*

Enclosed please find copies of Case Assignment Notifications filed in the below-referenced matters:

- CR25-1108A
- CR25-1108B
- CR24-1957
- CR24-2893
- CR24-2214

4. *Judge substitution orders*

Enclosed please find copies of the Memorandum of Temporary Assignments from the Nevada Supreme Court:

- Order No. 26-00344
- Order No. 26-00413
- Order No. 26-00413A
- Order No. 26-00438
- Order No. 26-00450
- Order No. 26-00469

5. *Emails, memos and all communications from Chief Judge Egan K. Walker removing Judge Connie J. Steinheimer from case assignments/Administrative Orders(s)*

Please see records produced pursuant to Request #1. To the extent that this request seeks "emails, memos and all communications", the District Court cannot provide copies of internal Court correspondence.

6. *Communications with/from Chief Judge Ean K. Walker with the Nevada Supreme Court regarding the removal of Judge Connie J. Steinheimer*

The District Court cannot provide copies of internal Court correspondence.

Sincerely,

[redacted]

Alicia L. Lerud, Esq.
Clerk of Court/District Court Administrator

Encls.

Second Judicial District Court
c/o Court Administrator
75 Court Street
Reno, Nevada. 89501

Beau Brown [redacted]

RE.: Public Records Request, Pursuant to NRS 239
March 26, 2026

Under the Nevada Public Records Act, I request the following:

1) Copies of any administrative orders, communications, memoranda, or directives regarding the removal or reassignment of JUDGE CONNIE J. STEINHEIMER from case assignments in the Second Judicial District Court issued in 2026.
2) Department A case reassignment orders
3) Docket transfer notices
4) Judge substitution orders
5) Emails, memos and all communications from CHIEF JUDGE EGAN K. WALKER removing JUDGE CONNIE J. STEINHEIMER from case assignments / Administrative Order(s)
6) Communications with / from Chief Judge

EGAN K. WALKER with The Nevada Supreme Court regarding the removal of JUDGE CONNIE J. STEINHEIMER.

Please be advised, per NRS 239.0107, you have not later than 5 days to respond to this Public Records Request, with a copy of this request and acknowledgment of the request.

Thank you for your time and consideration in this matter.

[redacted]

BEAU BROWN

DATED THIS 26th day of March, 2026

# REQUEST #1

FILED
Electronically
2JDC-AO
2026-02-23 02:42:12 PM
Alicia L. Lerud
Clerk of the Court
Transaction # 11532946

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF WASHOE

IN THE MATTER OF:

TEMPORARY REASSIGNMENT OF ALL D4 CASES AND COMMITTEE ASSIGNMENTS.

_____/

**ADMINISTRATIVE ORDER 2026-08**

The Chief Judge of the SJDC has authority to make administrative decisions pertaining to the business of the Court. WDCR 2(2); NRS 3.025(2)(c). Included within that decision making power is the ability to assign cases within the judicial district in order to effectuate the orderly and fair administration of justice.

Accordingly, it is ordered that effective immediately, the Honorable Connie J. Steinheimer shall be temporarily removed from all case and committee assignments currently reflected in Administrative Order 2024-01. Judge Steinheimer is not authorized to take any action on any pending or active cases currently assigned to Department 4 or within the Second Judicial District Court.

This Administrative Order shall remain in effect until further Administrative Order of the Chief Judge.

DATED this 23 day of February, 2026.

[redacted]

Egan K. Walker
CHIEF DISTRICT JUDGE

# REQUEST #2

FILED
Electronically
CR25-1108A
2026-03-05 04:20:55 PM
Alicia L. Lerud
Clerk of the Court
Transaction # 11558775

**CODE: 3370**

**IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**

**IN AND FOR THE COUNTY OF WASHOE**

**STATE OF NEVADA,**

**Plaintiff,**

**vs.**

**Case No. CR25-1108**

**RICHARD DALE REEFF (A)**

**VIKI CRICKETTE KRUSE (B),**

**Dept. No. 7**

**Defendant.**

/

**ORDER TRANSFERRING CASES**

On March 3, 2026, the above cases came before Department 7 for a continued evidentiary hearing.

Good cause appearing and in the interest of justice,

IT IS HEREBY ORDERED that the above cases shall be transferred to all further proceedings.

DATED: March 4, 2026.

[redacted]

EGAN K. WALKER
Chief District Judge
Department Seven

FILED
Electronically
CR25-1108B
2026-03-05 04:22:04 PM
Alicia L. Lerud
Clerk of the Court
Transaction # 11558782

**CODE: 3370**

**IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**

**IN AND FOR THE COUNTY OF WASHOE**

**STATE OF NEVADA,**

**Plaintiff,**

**vs.**

**Case No. CR25-1108**

**RICHARD DALE REEFF (A)**

**Dept. No. 7**

**VIKI CRICKETTE KRUSE (B),**

**Defendant.**

_____/

**ORDER TRANSFERRING CASES**

On March 3, 2026, the above cases came before Department 7 for a continued evidentiary hearing.

Good cause appearing and in the interest of justice,

IT IS HEREBY ORDERED that the above cases shall be transferred to all further proceedings.

DATED: March 4, 2026.

[redacted]

EGAN K. WALKER
Chief District Judge
Department Seven

FILED
Electronically
CR24-1957
2026-03-04 10:52:28 AM
Alicia L. Lerud
Clerk of the Court
Transaction # 11553912

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF WASHOE

***

THE STATE OF NEVADA,
Plaintiff,

Case No. CR24-1957

Dept. No. 4

vs.

DONALD RAY DELONEY,
Defendants.
_____/

## ORDER TRANSFERRING CASE

This case shall be transferred to Department 9 for all further proceedings. Any hearings set in Department 4 are vacated and shall be reset by counsel in Department 9.

**IT IS ORDERED.**

**DATED** this 3 day of March, 2026.

[redacted]
EGAN K. WALKER
Chief District Judge

FILED
Electronically
CR24-2893
2026-03-02 08:36:00 AM
Alicia L. Lerud
Clerk of the Court
Transaction # 11547308

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF WASHOE

***

THE STATE OF NEVADA,
Plaintiff,

Case No. CR24-2893

Dept. No. 4

vs.

BRIAN MISAEL AGUILER-FLORES,
Defendants.
_____/

## ORDER TRANSFERRING CASE

This case shall be transferred to Department 3 for all further proceedings.

**IT IS ORDERED.**

**DATED** this 2 day of ~~February~~ March, 2026.

[redacted]

EGAN K. WALKER
Chief District Judge

FILED
Electronically
CR24-2214
2026-04-07 04:46:26 PM
Alicia L. Lerud
Clerk of the Court
Transaction # 11625263

CODE NO. 3370

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

IN AND FOR THE COUNTY OF WASHOE

* * *

THE STATE OF NEVADA,

Plaintiff,

vs.

ARTHUR EDWARD JAMES, JR,

Defendant.

Case No. CR24-2214

Dept. No. 04

ORDER TRANSFERRING CASE

IT IS HEREBY ORDERED that the above-entitled case is transferred to Department Eight for all further proceedings.

DATED this 3rd day of April, 2026.

[redacted]

BARRY BRESLOW
DISTRICT COURT JUDGE

DATED this 6 day of April, 2026.

[redacted]

EGAN WALKER
CHIEF DISTRICT COURT JUDGE

# REQUEST #3

FILED
Electronically
CR25-1108A
2026-03-05 04:35:37 PM
Alicia L. Lerud
Clerk of the Court
Transaction # 11558848

**CODE 1312**

**IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**

**IN AND FOR THE COUNTY OF WASHOE**

**STATE OF NEVADA,**

**Plaintiff,**

**Case No: CR25-1108 A&B**

**Dept. No: 4**

**vs.**

**RICHARD DALE REEFF (A),**

**VIKI CRICKETTE KRUSE (B),**

**Defendant.**

/

**CASE ASSIGNMENT NOTIFICATION**

I hereby certify that the above-entitled matter has been transferred to Department 7, from Department 4.

Additional information:

On March 5, 2026, an **ORDER TRANSFERRING CASE** was filed.

Dated March 5, 2026.

ALICIA L. LERUD
Clerk of the Court

By **/s/N. Mason**
N. Mason- Deputy Clerk

SECOND JUDICIAL DISTRICT COURT * STATE OF NEVADA * DISTRICT COURT

**CERTIFICATE OF SERVICE**

Case No. CR25-1108 A&B

I certify that I am an employee of the Second Judicial District Court; that on March 5, 2026, I electronically filed the Case Assignment Notification with the clerk of the Court System which will send a notice of electronic filing to the following:

HONORABLE EGAN WALKER

DIV. OF PAROLE & PROBATION

MICHAEL VIETA-KABELL, ESQ. for STATE OF NEVADA

BIRAY DOGAN, ESQ. for RICHARD DALE REEFF

STEVEN A. FRISKEL, ESQ. for VIKI CRICKETTE KRUSE

Pursuant to NRCP 5 (b), I certify that I am an employee of the Second Judicial District Court, and that on March 5, 2026, I deposited in the Washoe County mailing system for postage and mailing with the U.S. Postal Service in Reno, Nevada, a true copy of the attached document, addressed to:

The undersigned does hereby affirm that the preceding document does not contain the social security number of any person.

Dated March 5, 2026.

**/s/N. Mason**
N. Mason
Deputy Clerk

FILED
Electronically
CR25-1108B
2026-03-05 04:36:17 PM
Alicia L. Lerud
Clerk of the Court
Transaction # 11558856

**CODE 1312**

**IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**

**IN AND FOR THE COUNTY OF WASHOE**

**STATE OF NEVADA,**

**Plaintiff,**

**Case No: CR25-1108 A&B**

**Dept. No: 4**

**vs.**

**RICHARD DALE REEFF (A),**

**VIKI CRICKETTE KRUSE (B),**

**Defendant.**

_____/

**CASE ASSIGNMENT NOTIFICATION**

I hereby certify that the above-entitled matter has been transferred to Department 7, from Department 4.

Additional information:

On March 5, 2026, an **ORDER TRANSFERRING CASE** was filed.

Dated March 5, 2026.

ALICIA L. LERUD
Clerk of the Court

By **/s/N. Mason**
N. Mason- Deputy Clerk

SECOND JUDICIAL DISTRICT COURT * STATE OF NEVADA * DISTRICT

**CERTIFICATE OF SERVICE**

Case No. CR25-1108 A&B

I certify that I am an employee of the Second Judicial District Court; that on March 5, 2026, I electronically filed the Case Assignment Notification with the clerk of the Court System which will send a notice of electronic filing to the following:

HONORABLE EGAN WALKER

DIV. OF PAROLE & PROBATION

MICHAEL VIETA-KABELL, ESQ. for STATE OF NEVADA

BIRAY DOGAN, ESQ. for RICHARD DALE REEFF

STEVEN A. FRISKEL, ESQ. for VIKI CRICKETTE KRUSE

Pursuant to NRCP 5 (b), I certify that I am an employee of the Second Judicial District Court, and that on March 5, 2026, I deposited in the Washoe County mailing system for postage and mailing with the U.S. Postal Service in Reno, Nevada, a true copy of the attached document, addressed to:

The undersigned does hereby affirm that the preceding document does not contain the social security number of any person.

Dated March 5, 2026.

**/s/N. Mason**
N. Mason
Deputy Clerk

FILED
Electronically
CR24-1957
2026-03-04 11:13:22 AM
Alicia L. Lerud
Clerk of the Court
Transaction # 11554029

**CODE 1312**

**IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**

**IN AND FOR THE COUNTY OF WASHOE**

**STATE OF NEVADA,**

**Plaintiff,**

**Case No: CR24-1957**

**Dept. No: 4**

**vs.**

**DONALD RAY DELONEY,**

**Defendant.**

_____/

**CASE ASSIGNMENT NOTIFICATION**

I hereby certify that the above-entitled matter has been transferred to Department 9, from Department 4.

Additional information:

On March 4, 2026, an **ORDER TRANSFERRING CASE** was filed.

Dated March 4, 2026.

ALICIA L. LERUD
Clerk of the Court

By **/s/N. Mason**
N. Mason- Deputy Clerk

SECOND JUDICIAL DISTRICT COURT STATE OF NEVADA

## CERTIFICATE OF SERVICE

Case No. CR24-1957

I certify that I am an employee of the Second Judicial District Court; that on March 4, 2026, I electronically filed the Case Assignment Notification with the clerk of the Court System which will send a notice of electronic filing to the following:

HONORABLE SCOTT FREEMAN

DIV. OF PAROLE & PROBATION

KATELYN CANTU, ESQ for DONALD RAY DELONEY

GIANNA M. VERNESS, ESQ. for DONALD RAY DELONEY

NATHAN D. MACLELLAN, ESQ. for STATE OF NEVADA

Pursuant to NRCP 5 (b), I certify that I am an employee of the Second Judicial District Court, and that on March 4, 2026, I deposited in the Washoe County mailing system for postage and mailing with the U.S. Postal Service in Reno, Nevada, a true copy of the attached document, addressed to:

The undersigned does hereby affirm that the preceding document does not contain the social security number of any person.

Dated March 4, 2026.

**/s/N. Mason**
N. Mason
Deputy Clerk

FILED
Electronically
CR24-2893
2026-03-03 07:37:28 AM
Alicia L. Lerud
Clerk of the Court
Transaction # 11550031

**CODE 1312**

**IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**

**IN AND FOR THE COUNTY OF WASHOE**

**STATE OF NEVADA,**

**Plaintiff,**

**Case No: CR24-2893**

**Dept. No: 4**

**vs.**

**BRIAN MISAEL AGUILER-FLORES,**

**Defendant.**

_____/

**CASE ASSIGNMENT NOTIFICATION**

I hereby certify that the above-entitled matter has been transferred to Department 3, from Department 4.

Additional information:

On March 2, 2026, an **ORDER TRANSFERRING CASE** was filed.

Dated March 3, 2026.

ALICIA L. LERUD
Clerk of the Court

By **/s/N. Mason**
N. Mason- Deputy Clerk



## CERTIFICATE OF SERVICE

Case No. CR24-2893

I certify that I am an employee of the Second Judicial District Court; that on March 3, 2026, I electronically filed the Case Assignment Notification with the clerk of the Court System which will send a notice of electronic filing to the following:

HONORABLE TAMMY RIGGS

DIV. OF PAROLE & PROBATION

LUKE J. PRENGAMAN, ESQ. for STATE OF NEVADA

CHRISTOPHER L. BLANDFORD, ESQ. for BRIAN MISAEL AGUILAR-FLORES

MARCIE E. RYBA, ESQ. for BRIAN MISAEL AGUILAR-FLORES

Pursuant to NRCP 5 (b), I certify that I am an employee of the Second Judicial District Court, and that on March 3, 2026, I deposited in the Washoe County mailing system for postage and mailing with the U.S. Postal Service in Reno, Nevada, a true copy of the attached document, addressed to:

The undersigned does hereby affirm that the preceding document does not contain the social security number of any person.

Dated March 3, 2026.

**/s/N. Mason**
N. Mason
Deputy Clerk

FILED
Electronically
CR24-2214
2026-04-07 04:50:48 PM
Alicia L. Lerud
Clerk of the Court
Transaction # 11625281

**CODE 1312**

**IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**

**IN AND FOR THE COUNTY OF WASHOE**

**STATE OF NEVADA,**

**Plaintiff,**

**Case No: CR24-2214**

**Dept. No: 4**

**vs.**

**ARTHUR EDWARD JAMES, JR.,**

**Defendant.**

_____/

**CASE ASSIGNMENT NOTIFICATION**

I hereby certify that the above-entitled matter has been transferred to Department 8, from Department 4.

Additional information:

On April 7, 2026, an **ORDER TRANSFERRING CASE** was filed.

Dated April 7, 2026.

ALICIA L. LERUD
Clerk of the Court

By **/s/N. Mason**
N. Mason- Deputy Clerk

SECOND JUDICIAL DISTRICT COURT STATE OF NEVADA

## CERTIFICATE OF SERVICE

Case No. CR24-2214

I certify that I am an employee of the Second Judicial District Court; that on April 7, 2026, I electronically filed the Case Assignment Notification with the clerk of the Court System which will send a notice of electronic filing to the following:

HONORABLE BARRY BRESLOW

RYNDAN RILEY, ESQ. for ARTHUR EDWARD JAMES

LORENA VALENCIA, ESQ. for STATE OF NEVADA

DIV. OF PAROLE & PROBATION

Pursuant to NRCP 5 (b), I certify that I am an employee of the Second Judicial District Court, and that on April 7, 2026, I deposited in the Washoe County mailing system for postage and mailing with the U.S. Postal Service in Reno, Nevada, a true copy of the attached document, addressed to:

The undersigned does hereby affirm that the preceding document does not contain the social security number of any person.

Dated April 7, 2026.

**/s/N. Mason**
N. Mason
Deputy Clerk

# REQUEST #4

--FILED--
Administrative Office of the Courts
Date: January 22, 2026

By: J. Osorio

**SUPREME COURT OF THE STATE OF NEVADA**
**ADMINISTRATIVE OFFICE OF THE COURTS**

IN THE MATTER OF THE ASSIGNMENT OF A SENIOR JUDGE

Order No. 26-00344

**MEMORANDUM OF TEMPORARY ASSIGNMENT**

WHEREAS all district judges in the Second Judicial District have recused themselves from hearing any and all matters in *Kelci Binau v Stephen Binau*, Case Number DV24-00734, now therefore,

IT IS HEREBY ORDERED that the Honorable James T. Russell, Senior Judge, is assigned to hear any and all matters in *Kelci Binau v Stephen Binau*, Case Number DV24-00734, and he shall have authority to sign any orders arising out of this assignment. The Court shall notify the parties of the assignment and provide James T. Russell, Senior Judge with any assistance as requested.

Entered this 22nd day of January 2026.

NEVADA SUPREME COURT

By: [redacted], Justice

Copy: The Honorable James T. Russell, Senior Judge
The Honorable Lynne Jones, Chief Judge, Second Judicial District Court
Alicia Lerud, Court Administrator, Second Judicial District Court

--FILED—
Administrative Office of the Courts
Date: February 25, 2026

By: J. Osorio

**SUPREME COURT OF THE STATE OF NEVADA**
**ADMINISTRATIVE OFFICE OF THE COURTS**

IN THE MATTER OF THE ASSIGNMENT OF A SENIOR JUDGE

Order No. 26-00413

**MEMORANDUM OF TEMPORARY ASSIGNMENT**

WHEREAS, the Honorable Connie J. Steinheimer, District Judge, Department 04, Second Judicial District Court, is unavailable and no other Judge in the District is available, now therefore,

IT IS HEREBY ORDERED that the Honorable James W. Hardesty, Senior Justice, shall hear any and all matters in Department 04 on March 2 - March 31, 2026, and shall have authority to sign any orders arising out of this assignment. During this time, the Honorable James W. Hardesty, Senior Justice, may preside over any other matters as requested by the Chief or Presiding Judge.

ENTERED this 25th day of February 2026.

NEVADA SUPREME COURT

By: _____, Justice

Copy: The Honorable James W. Hardesty, Senior Justice
The Honorable Lynne Jones, Chief Judge, Second Judicial District Court
Alicia Lerud, Court Administrator, Second Judicial District Court

--FILED—
Administrative Office of the Courts
Date: February 25, 2026

By: J. Osorio

**SUPREME COURT OF THE STATE OF NEVADA**
**ADMINISTRATIVE OFFICE OF THE COURTS**

IN THE MATTER OF THE ASSIGNMENT OF A SENIOR JUDGE

Order No. 26-00413A

**MEMORANDUM OF TEMPORARY ASSIGNMENT**

WHEREAS, the Honorable Connie J. Steinheimer, District Judge, Department 04, Second Judicial District Court, is unavailable and no other Judge in the District is available, now therefore,

IT IS HEREBY ORDERED that the Honorable James T. Russell, Senior Judge, shall hear any and all matters in Department 04 on March 2 - March 31, 2026, and shall have authority to sign any orders arising out of this assignment. During this time, the Honorable James T. Russell, Senior Judge, may preside over any other matters as requested by the Chief or Presiding Judge.

ENTERED this 25th day of February 2026.

NEVADA SUPREME COURT

By: [redacted], Justice

Copy: The Honorable James T. Russell, Senior Judge
The Honorable Lynne Jones, Chief Judge, Second Judicial District Court
Alicia Lerud, Court Administrator, Second Judicial District Court

--FILED--
Administrative Office of the Courts
Date: March 6, 2026

By: J. Osorio

**SUPREME COURT OF THE STATE OF NEVADA**
**ADMINISTRATIVE OFFICE OF THE COURTS**

IN THE MATTER OF THE ASSIGNMENT OF A SENIOR JUDGE

Order No. 26-00438

**MEMORANDUM OF TEMPORARY ASSIGNMENT**

WHEREAS, the Honorable Connie J. Steinheimer, District Judge, Department 04, Second Judicial District Court, is unavailable and no other Judge in the District is available, now therefore,

IT IS HEREBY ORDERED that the Honorable Robert E. Estes, Senior Judge, shall hear any and all matters in Department 04 on April 13 - April 14, 2026, and shall have authority to sign any orders arising out of this assignment. During this time, the Honorable Robert E. Estes, Senior Judge, may preside over any other matters as requested by the Chief or Presiding Judge.

ENTERED this 6th day of March 2026.

NEVADA SUPREME COURT

By: [redacted], Justice

Copy: The Honorable Robert E. Estes, Senior Judge
The Honorable Lynne Jones, Chief Judge, Second Judicial District Court
Alicia Lerud, Court Administrator, Second Judicial District Court

--FILED--
Administrative Office of the Courts
Date: March 16, 2026

By: J. Osorio

**SUPREME COURT OF THE STATE OF NEVADA**
**ADMINISTRATIVE OFFICE OF THE COURTS**

IN THE MATTER OF THE ASSIGNMENT OF A SENIOR JUDGE

Order No. 26-00450

**MEMORANDUM OF TEMPORARY ASSIGNMENT**

WHEREAS, the Honorable Connie J. Steinheimer, District Judge, Department 04, Second Judicial District Court, is unavailable and no other Judge in the District is available, now therefore,

IT IS HEREBY ORDERED that the Honorable James T. Russell, Senior Judge, shall hear any and all matters in Department 04 on April 1 - April 30, 2026, and shall have authority to sign any orders arising out of this assignment. During this time, the Honorable James T. Russell, Senior Judge, may preside over any other matters as requested by the Chief or Presiding Judge.

ENTERED this 16th day of March 2026.

NEVADA SUPREME COURT

By: [redacted], Justice

Copy: The Honorable James T. Russell, Senior Judge
The Honorable Lynne Jones, Chief Judge, Second Judicial District Court
Alicia Lerud, Court Administrator, Second Judicial District Court

--FILED—
Administrative Office of the Courts
Date: March 30, 2026

By: J. Osorio

**SUPREME COURT OF THE STATE OF NEVADA**
**ADMINISTRATIVE OFFICE OF THE COURTS**

IN THE MATTER OF THE ASSIGNMENT OF A SENIOR JUDGE

Order No. 26-00469

**MEMORANDUM OF TEMPORARY ASSIGNMENT**

WHEREAS, the Honorable Connie J. Steinheimer, District Judge, Department 04, Second Judicial District Court, will be unavailable and no other Judge in the District is available, now therefore,

IT IS HEREBY ORDERED that the Honorable James T. Russell, Senior Judge, shall hear any and all matters in the matter of *Christopher Lewis Eddines*, Case Number CR26-0175, currently scheduled for April 28 - April 29, 2026 and shall have authority to sign any orders arising out of this assignment. During this time, the Honorable James T. Russell, Senior Judge, may preside over any other matters as requested by the Chief or Presiding Judge.

ENTERED this 30th day of March 2026.

NEVADA SUPREME COURT

By: [redacted], Justice

Copy: The Honorable James T. Russell, Senior Judge
The Honorable Lynne Jones, Chief Judge, Second Judicial District Court
Alicia Lerud, Court Administrator, Second Judicial District Court

State of Nevada Commission on Ethics

Public Records Request

**Submitted Electronically on:**

| Requestor Contact Information | |
|---|---|
| Name: | Berger, Derek |
| Organization: | Brokers Broker LLC |
| Address: | [redacted] |
| Phone: | [redacted] |
| E-mail: | [redacted] |

| Requested Record(s) Details | |
|---|---|
| Delivery Method: | Deliver by E-mail |

This is a request to inspect and receive copies of public books and records under NRS 239.010(1). I [redacted] nI have written this request in three parts so that the categories most likely to be confidential are kept separate from the categories that are not. Please treat each numbered item as a distinct request, respond to each one separately, and produce records on a rolling basis rather than holding everything until the last item is resolved.\nPART ONE: RECORDS I BELIEVE ARE PUBLIC ON THEIR FACE\ [redacted] These are my own submissions and my own correspondence, and I am not aware of any interest served by withholding them from me.\n [redacted] I already hold a copy. I request it so that the production is complete and so that the Commission's own designation of the document is part of the record.\nThe agenda for the Commission meeting or session [redacted] together with any minutes, audio recording, video recording or transcript of any portion of that proceeding that was open to the public.\nAny public notice or posting [redacted].\nThe Commission's current public records policy, its current fee schedule for the production of records, and its current records retention schedule.\nAny written procedures, checklists, manuals, standards, guidance or training materials used by the Commission, the review panel or the Executive Director in conducting the jurisdictional and evidentiary review required by NRS 281A.715 and NAC 281A.405, including any written standard applied in determining whether a complaint alleges a pecuniary interest or a private commitment.\nThe Commission's annual reports, and any statistical or aggregate compilations maintained by the Commission,

covering complaints received, jurisdiction declined, dismissals entered and investigations opened, for fiscal year 2024 through the present.\nAny opinion, review panel determination, order of dismissal or other disposition, in whatever published or redacted form the Commission maintains for public release, involving an officer or employee of the Nevada Health Authority, of the Division of Health Care Financing and Policy, or of the Silver State Health Insurance Exchange.\nPART TWO: JURISDICTION AND CORRESPONDENCE WITH OTHER AGENCIES\nOn July 20, 2026 the Nevada Division of Insurance closed my related complaints numbered 25.0023 and 25.0025. Its final disposition states that "Investigations pertaining to the actions of a NVHA Administrator would fall under the jurisdiction of the Nevada Commission of Ethics." [redacted] Records showing how that jurisdictional boundary was understood and communicated between the two agencies are not, in my view, information "related to an ethics complaint" within the meaning of NRS 281A.750(1). They concern the allocation of authority between two state agencies, which is a matter of public governance. I request them separately for that reason, and I ask that they be evaluated on their own terms rather than swept into the complaint file.\nAll communications between the Commission or its staff and the Nevada Division of Insurance, from December 1, 2025 to the present, concerning jurisdiction over officers or employees of the Nevada Health Authority, broker or producer compensation, or the Battle Born State Plans.\nAll communications between the Commission or its staff and the Nevada Health Authority, the Office of the Governor, the Office of the Attorney General, or the Legislative Counsel Bureau, over the same period, concerning the same subjects.\nAny request for an advisory opinion submitted under NRS 281A.680 by any officer or employee of the Nevada Health Authority concerning broker or producer compensation, producer certification, a broker code of conduct, or a grant program for agents and brokers, in whatever published or redacted form exists.\nAny record reflecting a referral of any matter concerning the Nevada Health Authority, or an officer or employee of it, to or from the Commission, from December 1, 2025 to the present.\nAny index, log, docket or summary sufficient to show the number of ethics complaints the Commission has received concerning officers or employees of the Nevada Health Authority since January 1, 2024, and the disposition of each, without any identifying detail as to subject or complainant.\nRecords sufficient to show whether any letter of caution or letter of instruction under NRS 281A.780 was issued [redacted] \nRecords sufficient to show [redacted] was entered under NRS 281A.715(2), on the ground that the Commission lacked jurisdiction, or under NRS 281A.715(3), on the ground that the Commission had jurisdiction but the evidence submitted was not sufficient to warrant an investigation. If no record answers this question directly, I ask the Commission to state the answer in writing in its response.\nPART THREE: THE COMPLAINT FILE, AND THE ROUTE TO RELEASE\nI understand that NRS 281A.750(1) makes information, communications, records, documents and other materials in the possession of the Commission, the review panel or their staff that are related to an ethics complaint confidential until either the review panel determines that there is just and sufficient cause to render an opinion, or the subject of the complaint authorizes disclosure. [redacted] I therefore make the following requests with that provision in view, and with an express route to release attached.\ [redacted] including any index, list or table of contents identifying the materials considered.\nPlease confirm in writing whether [redacted] authorized disclosure of any materials under NRS 281A.750(1).\nIf [redacted] has not, please

advise whether the Commission will convey a request for such authorization to [redacted] or alternatively identify the procedure by which I may direct that request to [redacted] or to [redacted] counsel. I am prepared to make that request in writing in whatever form the Commission prefers.\nIf items 16 and 17 are withheld in whole or in part, please produce any portion from which the confidential information can be redacted, deleted, concealed or separated, as NRS 239.010(3) requires.\nHOW I ASK THAT THIS REQUEST BE HANDLED\nRedaction rather than blanket denial. NRS 239.010(3) provides that a governmental entity shall not deny a request on the basis that a record contains confidential information if the entity can redact, delete, conceal or separate that information. NRS 239.001(2) directs that the chapter be construed liberally, and NRS 239.001(3) directs that any exemption, exception or balancing of interests limiting access be construed narrowly. I ask that both provisions be applied item by item rather than to the request as a whole.\nWritten reasons if anything is withheld. If access to any item is denied, NRS 239.0107(1)(d) requires written notice that includes a citation to the specific statute or other legal authority that makes the record confidential. Please identify which numbered item each citation applies to, so that the response can be evaluated item by item.\nIf you are not the custodian. If the Commission is not the custodian of any item, NRS 239.0107(1)(b) asks that you provide written notice identifying the governmental entity that has custody, with its contact information, and I would appreciate that in place of a simple denial.\nFormat and cost. Electronic production is preferred, in the format in which the records are ordinarily maintained, delivered by email or by download link. Under NRS 239.052 fees may not exceed the actual cost of providing the records, and NRS 239.055 requires an itemized statement in writing before an additional fee for extraordinary use is charged. Please provide a written estimate before incurring any cost above fifty dollars, and I will respond promptly.\nTiming. NRS 239.0107(1) sets the end of the fifth business day after receipt as the deadline for one of the four responses the statute allows. If some items are readily available and others are not, I ask that the available items be produced as expeditiously as practicable rather than held pending resolution of the rest.\nPreservation. Please preserve all records responsive to this request, in native format and with metadata intact, until this request is fully resolved, and please suspend any automatic deletion or retention schedule that would otherwise reach them during that period. This paragraph does not itself request production of anything.\nI appreciate the Commission's time. If narrowing any item would speed the response, I am glad to discuss it, and I would rather refocus a request than have it denied as overbroad.\n

☑ I certify that the information I provided is true and correct to the best of my knowledge. I understand that copying and other direct costs (ink, toner, paper, media, postage, etc.) may apply and that records will not be released until the estimated fee deposit is received.

☑ By signing this document electronically, which is legally equivalent to a handwritten signature, I fully acknowledge that my electronic signature reflects my intent to validate and endorse the contents of this document; furthermore, I confirm that I have the necessary ability and authorization to sign electronically and am doing so

knowingly, with the full intent of establishing a binding and authenticated record.

Signature: [redacted]

Sign Date: 07/25/2026

704 W. Nye Lane Suite 204 Carson City, NV 89703
Tel: 775-687-5469 | Fax: 775-687-1279
ncoe@ethics.nv.gov | https://ethics.nv.gov

Outlook

# Fwd: DEMAND FOR WRITTEN DETERMINATION ON COMPLAINTS PENDING SINCE DECEMBER 5, 2025; Broker Compensation Suppression on Nevada's Battle Born State Plans (Section 1332 Waiver, approved Jan. 10, 2025); State Failure to Enforce 45 C.F.R. §§ 147.104(e) and ...

**From** Derek Berger [redacted]

**Date** Sat 7/25/2026 7:08 AM

**To** asha.jones@mail.house.gov <asha.jones@mail.house.gov>; joleen_rivera@cortezmasto.senate.gov <joleen_rivera@cortezmasto.senate.gov>; bridget_kelleher@cortezmasto.senate.gov <bridget_kelleher@cortezmasto.senate.gov>; lauren_wodarski@cortezmasto.senate.gov <lauren_wodarski@cortezmasto.senate.gov>; alejandro_renteria@rosen.senate.gov <alejandro_renteria@rosen.senate.gov>; colby.harriman@mail.house.gov <colby.harriman@mail.house.gov>; mitch.moonier@mail.house.gov <mitch.moonier@mail.house.gov>; lauren.toy@mail.house.gov <lauren.toy@mail.house.gov>; max.kobetz@mail.house.gov <max.kobetz@mail.house.gov>; trey.webster@mail.house.gov <trey.webster@mail.house.gov>; ken.brooke@mail.house.gov <ken.brooke@mail.house.gov>; dara_cohen@rosen.senate.gov <dara_cohen@rosen.senate.gov>

**Cc** NV Insurance <insinfo@doi.nv.gov>; Legal <legal@doi.nv.gov>; Info NVHA <nvhainfo@nvha.nv.gov>; Ned Gaines <ngaines@doi.nv.gov>; Nevada Commission on Ethics <ncoe@ethics.nv.gov>; CMS Market Conduct <marketconduct@cms.hhs.gov>; CMS StateInnovationWaivers <stateinnovationwaivers@cms.hhs.gov>; Wilson, Lisa (CMS/CCIIO) <lisa.wilson@cms.hhs.gov>; Pothen, Meril (CMS/CCIIO) <Meril.Pothen@cms.hhs.gov>; Wu, Jeff (CMS/CCIIO) <Jeff.Wu@cms.hhs.gov>; Oakes, Meghan (CMS/CCIIO) <meghan.oakes@cms.hhs.gov>; Stacie Weeks <sweeks@nvha.nv.gov>; iaudits <iaudits@finance.nv.gov>; Ruby Camposano <rrcamposano@finance.nv.gov>; Isabel Graf <igraf@gov.nv.gov>; robin.titus@sen.state.nv.us <robin.titus@sen.state.nv.us>; Jack Childress <jchildress@doi.nv.gov>; Nicole.Cannizzaro@sen.state.nv.us <Nicole.Cannizzaro@sen.state.nv.us>; Steve.Yeager@asm.state.nv.us <Steve.Yeager@asm.state.nv.us>; Fabian.Donate@sen.state.nv.us <Fabian.Donate@sen.state.nv.us>; Marilyn.DonderoLoop@sen.state.nv.us <Marilyn.DonderoLoop@sen.state.nv.us>; Daniele.MonroeMoreno@asm.state.nv.us <Daniele.MonroeMoreno@asm.state.nv.us>; DO NVDHS INQUIRIES <nvdhs@dhs.nv.gov>; AGRequest <AGRequest@ag.nv.gov>; Maile Campbell <mcampbell@doi.nv.gov>; GovCHA <CHA@govcha.nv.gov>

2 attachments (5 MB)

26.0023_26.0025_Final_Disposition (2).pdf; NVHA FOIA.pdf;

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada Congressional Delegation Legislative Staff Members,

I am a Nevada-licensed insurance producer and the principal of a Nevada producer agency with independent broker partners in every corner of the state. I am forwarding the enclosed demand, which I submitted to CMS, because the complaint behind it has been pending at CMS since December 5, 2025 with no determination and no identified owning component. Everything below comes from public records the State produced to me, guidance CMS has published, or correspondence addressed to me.

I have quoted rather than characterized, and the attachment gives a source for every statement so your office can verify it independently.

Nevada's public option, the **Battle Born State Plans**, launched for Plan Year 2026 under a Section 1332 waiver CMS approved on January 10, 2025. The authorizing statute requires premiums to come in at least five percent below reference plans. To reach that target, the participating carriers cut or eliminated producer commissions on those plans while continuing to pay ordinary commissions on their own comparable qualified health plans. Two carriers filed at zero; the third filed at roughly seventy-five percent below its standard schedule.

CMS guidance from December 16, 2016 guidance states that "a commission arrangement or other agent/broker compensation that is structured to discourage agents and brokers from marketing to and enrolling consumers with significant health needs constitutes a discriminatory marketing practice." Their June 7, 2022 FAQ reaffirmed that paying reduced or no commission for one category of enrollment while paying more for another conflicts with the guaranteed-availability protections of the Affordable Care Act. The governing regulations are 45 C.F.R. §§ 147.104(e) and 156.225(b).

The practical effect is that the subsidized and higher-need consumers these plans were designed to reach are the consumers a producer is paid nothing to assist. That is a coverage problem before it is a compensation problem.

In the Nevada Public Records Act production I received (attached) on February 11, 2026, at pages 753 and 754, a Nevada Health Authority administrator wrote to Anthem on August 18, 2025, before open enrollment, asking to "verify … that Anthem (Community Health Care Plan of Nevada) will not be offering broker commissions for BBSPs in PY 2026." The carrier replied the next day: "we are confirming that there will be no broker commission in the BBSP plans," citing "the requirements of both price reductions and administrative expense reductions outlined in the RFP." Furthermore, in the same conversation, the NVHA Administrator requests **steering** efforts by Anthem "**"I'd also really like to explore the use of Anthem telemarketers to help promote BBSPs."**, to which they oblige:

NVHA realized that not paying brokers commissions would result in the BBSP program failing, so an attempted state-funded "broker-incentive" was discussed. At pages 421 and 422 of the same production, the State's own outside consultant, **HMA**, warned **in writing** that the plan-specific broker payment then being designed "**could be construed as steering**," and raised "**steering/antikickback concerns**." The exact same design the NVHA administrator was advised against was adopted anyway and put into law with a two-year, $2.5M "broker incentive" in SB4.

On December 5, 2025, less than a week after SB4 became law, I questioned the legality of the compensation structure and of the state broker incentive program at a Nevada Health Authority broker workshop, and filed a whistleblower report with the Division of Insurance the same day. The workshop was recorded and the Authority

posted it publicly; the recording is at https://www.youtube.com/watch?v=tJgwZTIlaZo, and the relevant exchange begins at approximately 37:10.

That same evening, the Authority's Consumer Health Services Administrator emailed me, copying Broker Support and the Battle Born program mailbox: "**Given your behavior and written comments in the Nevada Health Authority Broker Workshop this afternoon, we have no choice but to initiate a review of your certification status, which may result in decertification**." The message characterizes my comments as "accusatory language or insinuations of impropriety" and my tone as "unwarranted and unprofessional." It identifies no consumer complaint, and no statement of mine alleged to be inaccurate. The stated trigger is what I questioned at the workshop, **an illegal payment structure that they had already been told would be called into question by their advisors at HMA**.

Certification is the credential a Nevada producer needs to sell on the exchange at all. I have separately asked the State for any records showing that the review it announced was ever actually opened. I include this only because it bears on whether other Nevada producers can be expected to raise this themselves, and silence from the broker community should not be read as agreement. The NVHA administrator's actions are textbook **whistleblower retaliation** which no one should have to fear when reporting illegal activities.

The Nevada Division of Insurance closed two complaints by Final Disposition on July 20, 2026, concluding it has no authority over the Nevada Health Authority or over 45 C.F.R. § 155.220 and that no further action is warranted, without reaching the compensation practices of the carriers it licenses. The Commission on Ethics dismissed on jurisdictional grounds. The Governor's Office and the Division of Internal Audits closed their files and deferred to the Division of Insurance. The Legislative Counsel Bureau advised it lacks authorization to audit the program.

CMS acknowledged on March 3, 2026 that it "will look further into the issues you have raised and circle back," and advised on June 29, 2026 that it is "coordinating internally with the appropriate teams." Under 42 U.S.C. § 300gg-22 a state is the primary enforcer of these federal provisions and CMS steps in where a state does not substantially enforce them. Nevada has now said on the record that it will not act, which places the question squarely with CMS, where it has sat for more than seven months.

**What I am asking your office to consider, first:** oversight attention to CMS's enforcement of its own compensation guidance. The standard has existed in writing since 2016, so what is missing is enforcement, not a rule. Four questions are narrow and answerable: which CMS component owns a complaint of this kind; what a complainant should expect, and by when; whether a state pursuing premium reductions under a Section 1332 waiver may achieve them by suppressing producer compensation on the waiver plans; and what CMS does where a state marketplace declines to enforce the federal marketing standards in its own market. Nevada is the newest public option state and the first to present the question.

**Second:** support for a durable parity fix. Colorado has already legislated the answer. C.R.S. § 10-16-1305(4) requires producer compensation on its public option plans to be no less favorable than on the carrier's comparable plans, enforced through ordinary annual rate review, and Colorado met its premium targets with that requirement in place, which answers the objection that parity is unworkable. The same rule states in one sentence at the federal level, in statute or in the annual Notice of Benefit and Payment Parameters, and would resolve this prospectively for every state considering a public option.

**Timing:** Plan Year 2027 rates and compensation schedules are being set now, and certification closes this fall. Corrected before certification, this is fixed for Nevada consumers going into the next open enrollment. After certification, another full plan year passes with the same structure in place.

I am glad to walk your office through any of this, provide the full public records production, or connect you with hundreds of other affected Nevada producers. Thank you for your time.

Respectfully submitted,

Derek Berger, individually (NV Producer Lic [redacted]), and as principal of
Broker's Broker LLC (NV Li [redacted])
[redacted]

---------- Forwarded message ---------
From: **Derek Berger** [redacted]
Date: Mon, Jul 20, 2026 at 11:25 PM
Subject: DEMAND FOR WRITTEN DETERMINATION ON COMPLAINTS PENDING SINCE DECEMBER 5, 2025; Broker Compensation Suppression on Nevada's Battle Born State Plans (Section 1332 Waiver, approved Jan. 10, 2025); State Failure to Enforce 45 C.F.R. §§ 147.104(e) and 156.225(b); Request for Action Under 42 U.S.C. § 300gg-22, 45 C.F.R. Part 150, and 45 C.F.R. §§ 155.1200 et seq.
To: CMS Market Conduct <marketconduct@cms.hhs.gov>, Wilson, Lisa (CMS/CCIIO) <lisa.wilson@cms.hhs.gov>, Wu, Jeff (CMS/CCIIO) <jeff.wu@cms.hhs.gov>, Pothen, Meril (CMS/CCIIO) <meril.pothen@cms.hhs.gov>, CMS StateInnovationWaivers <stateinnovationwaivers@cms.hhs.gov>, Oakes, Meghan (CMS/CCIIO) <meghan.oakes@cms.hhs.gov>

To the Director and enforcement staff:

I first raised this matter with CMS on December 5, 2025, by complaint to the Market Conduct Division (marketconduct@cms.hhs.gov), the enforcement channel CMS's own June 7, 2022 FAQ designates, and, the same morning, to the State Innovation Waivers mailbox. I followed up in writing to both on February 21, 2026. On March 3, 2026, the 1332 Waiver Team acknowledged: "We will look further into the issues you have raised and circle back." It never did. On June 28, 2026, I consolidated the record for the staff engaged on the matter; on June 29, 2026, CMS staff replied that the agency is "coordinating internally with the appropriate teams." More than seven months after my original complaints, and with the State's refusal to enforce now complete; CMS has issued no determination and taken no visible action. This

letter demands one. I am a Nevada-licensed producer (Lic. #923047); my agency, Broker's Broker LLC (Lic. #1029937), serves a downline of appointed Nevada brokers.

For Plan Year 2026, the carriers offering Nevada's public option, the Battle Born State Plans ("BBSPs"), qualified health plans sold through Nevada Health Link under the Section 1332 waiver CMS approved January 10, 2025, adopted producer compensation structures that discourage licensed brokers from assisting consumers with BBSP enrollment: Anthem and Ambetter (SilverSummit Healthplan) filed BBSPs with zero broker commission, and Health Plan of Nevada filed a commission approximately 75% below its standard QHP commission, while each pays standard commissions on its own comparable non-BBSP QHPs. CMS's December 16, 2016 guidance states that "a commission arrangement or other agent/broker compensation that is structured to discourage agents and brokers from marketing to and enrolling consumers with significant health needs constitutes a discriminatory marketing practice" under 45 C.F.R. §§ 147.104(e) and 156.225(b). CMS's June 7, 2022 FAQ states that arrangements that "pay reduced (or no) commissions" for one category of enrollment while paying more for another "violate the guaranteed availability provisions of the Affordable Care Act." The BBSP population these plans exist to serve, subsidized, lower-income, higher-need Nevadans, is precisely the population this compensation structure steers brokers away from. First-year BBSP enrollment fell materially short of the State's projections; suppressed broker distribution is a proximate cause, with direct consequences under the waiver's own terms (STC 11's additional-premium-relief obligation if BBSP take-up falls below 35%).

On August 18, 2025, before open enrollment, the Nevada Health Authority's Consumer Health Services Administrator wrote Anthem's Nevada representative to "verify … that Anthem (Community Health Care Plan of Nevada) will not be offering broker commissions for BBSPs in PY 2026," noted the Authority's approval power over Anthem's marketing plan, and proposed "the use of Anthem telemarketers to help promote BBSPs." Anthem confirmed in writing the next day: "we are confirming that there will be no broker commission in the BBSP plans," citing "the requirements of both price reductions and administrative expense reductions outlined in the RFP." And on September 26, 2025, the Authority's own consultant warned in writing that a per-enrollment, plan-specific broker payment "could be construed as steering" and could raise "steering/antikickback concerns," citing 45 C.F.R. § 155.220, yet the Authority adopted the plan-specific design anyway. These records (public-records production of Feb. 11, 2026, pp. 421-422, 753-754) are available to CMS immediately upon request.

**The State's refusal to enforce:**

1. December 5, 2025: the Nevada Division of Insurance's Chief Insurance Examiner (L&H) stated the Division "is not involved with monitoring the commission program."
2. July 20, 2026: the Division issued a Final Disposition closing my complaints (Causes 25.0023/25.0025), disclaiming authority over the Nevada Health Authority, SB 494/NRS 439, and 45 C.F.R. § 155.220, and stating no further action is warranted, while saying nothing about the compensation practices of the carriers it licenses.
3. Every other state channel has closed: [redacted] the Governor's Office deferred to the Division (June 26, 2026); the Governor's Finance Office closed its NRS 353A.049 file deferring to the Division (July 13, 2026); the LCB Audit Division lacks authorization absent legislative direction (Dec. 8, 2025).
4. Instead of requiring parity, the State enacted a taxpayer-funded substitute, a "Broker Incentive Program" funded by SB 4 of the 36th (2025) Special Session, administered by the Nevada Health Authority, paying state grants for BBSP enrollments (with additional payments for Special Enrollment Period enrollments), only to individual brokers registered as state vendors, and expressly not to agencies. A state agency paying plan-specific bounties while its carriers pay $0 is not compliance; it is state-administered steering that compounds the neutrality problem under 45 C.F.R. § 155.205(d)-(e). When I questioned the program's legality at the Authority's December 5,

2025 broker workshop, the Authority's Consumer Services Administrator sent me a same-day written threat referencing my “behavior and written comments”, documented in the State's own Governor's Finance Office records.

**Action requested:**

1. Issue a written determination on my December 5, 2025 complaints within 30 days, identifying the CMS component responsible for them and the timeline for resolution, or state in writing that CMS declines to act, and the basis for declining.
2. Initiate a review under 42 U.S.C. § 300gg-22 and 45 C.F.R. Part 150 into whether Nevada is failing to substantially enforce the guaranteed-availability and nondiscriminatory-marketing requirements (45 C.F.R. §§ 147.104(b), (e)) with respect to BBSP issuers, and if so, undertake direct federal enforcement, including civil money penalties.
3. Initiate a State-based Exchange programmatic review of Nevada Health Link / the Nevada Health Authority under 45 C.F.R. §§ 155.1200 et seq., addressing QHP issuer compensation oversight (45 C.F.R. § 156.225(b)), Exchange neutrality (45 C.F.R. § 155.205(d)-(e)), agent/broker program administration (45 C.F.R. § 155.220), and the SB 4 Broker Incentive Program.
4. Place this matter on the next semi-annual monitoring call required by STC 13 of the waiver's Specific Terms and Conditions; require the State to address broker compensation and the enrollment shortfall in its STC 11 reporting (including the sub-35% take-up premium-relief obligation); and confirm the date of the STC 12 annual public forum so affected producers may appear.
5. Require Plan Year 2027 corrective action before certification: BBSP producer compensation at parity with each issuer's comparable QHPs, consistent with the 2016 guidance and 2022 FAQ, before PY2027 open enrollment begins November 1, 2026.
6. I can supply the complete documentary record (complaints, dispositions, carrier schedules, and the State's correspondence) immediately upon request.

This is a first-in-nation test of whether a state public option may meet its premium mandates by stripping the independent broker distribution channel that federal law protects. Washington, Colorado, and every state considering a public option will follow what CMS does here.

Respectfully submitted,

Derek Berger, individually (NV Producer Lic [redacted]), and as principal of
Broker's Broker LLC (NV Lic [redacted])
[redacted]

Outlook

**Notice to preserve evidence; Battle Born State Plan producer compensation, plan years 2026 and 2027** [redacted]

**From** Derek Berger <[redacted]>
**Date** Tue 7/28/2026 5:00 AM
**To** Nevada Commission on Ethics <ncoe@ethics.nv.gov>

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Derek Berger | Brokers Broker
[redacted]
[redacted] NV Producer Lic. #[redacted] | Agency Lic. #[redacted]

July 28, 2026

Nevada Commission on Ethics
Attn: Ross E. Armstrong, Esq., Executive Director, and Elizabeth J. Bassett, Esq., Commission Counsel
704 W. Nye Lane
Carson City, NV 89703

Re: Notice to preserve evidence; Battle Born State Plan producer compensation, plan years 2026 and 2027; Commission Case No. 26-060C

This message is sent to the general mailbox of the Commission because it is the address the Commission publishes. Please route it to the Executive Director, to Commission Counsel, and to the person responsible for the Commission's records retention.

Director Armstrong:

Derek Berger and Brokers Broker anticipate litigation and administrative proceedings concerning producer compensation on the Battle Born State Plans. This message is formal notice to preserve evidence. It is complete on its face, it takes effect on receipt, and no attachment is needed to act on it. It asks that nothing be produced, it is not a request for records, and it is not a discovery demand.

ALSO IN THE MAIL TODAY

A signed original of this notice, with Schedule A (the custodians and record categories specific to the Commission) and Schedule B (systems, repositories, time periods, and preservation directives), was mailed to the address above today by certified mail, return receipt requested, article number 9589 0710 5270 2613 6447 39. Both schedules are incorporated into this notice by reference and control where they are more detailed than the summary below. Please do not wait for the envelope to arrive before acting.

WHY THIS NOTICE REACHES THE COMMISSION, AND WHAT IT DOES NOT ASK

This notice does not ask the Commission to reconsider anything, does not question the conduct of the Commission or of any Commissioner or member of its staff, and is not a complaint about the Commission. The Commission holds the complete record of Ethics Complaint Case No. 26-060C, the matter the sender initiated on February 23, 2026 and which the Commission dismissed for want of jurisdiction by Order entered April 6, 2026. That record, including the complaint, the evidence submitted with it, the recommendation of the Executive Director, and the record of the review conducted on April 6, 2026, may become relevant in proceedings elsewhere. Confidentiality governs who may see that record. It does not govern whether the record must continue to exist.

CONFIDENTIALITY GOVERNS DISCLOSURE, NOT RETENTION

The record of a complaint before the Commission is confidential, and the Order of Dismissal itself is marked confidential. Nothing in this notice asks that any confidential material be disclosed, produced, or shared, and nothing in it asks the Commission to depart in any way from the confidentiality the Ethics in Government Law requires. Confidentiality is a rule about who may see a record. It is not a rule about whether the record must continue to exist, and it is not a reason to permit any part of the file to be deleted, purged, overwritten, or destroyed. If the Commission's retention schedule would otherwise permit the destruction of a closed or declined matter, that destruction should be suspended as to the matter described below.

THE MATTER

Ethics Complaint Case No. 26-060C, In re Jennifer Krupp, Administrator, Consumer Health Services Division, Nevada Health Authority. The Commission received the complaint on February 23, 2026. On April 6, 2026 the Commission conducted its jurisdictional and evidentiary review under NRS Chapter 281A and NAC 281A.405, declined jurisdiction on the ground that the complaint failed to allege a pecuniary interest or a private commitment, and dismissed the complaint by Order signed by Chair Scott Scherer, Esq. The Order records that the review considered the complaint, the supporting evidence, and the recommendation of the Executive Director, and that Chair Scherer, Vice Chair Wallin, and Commissioners Langton, Lowry, Miller, Moran, Reynolds, and Smith participated.

THE OBLIGATION BEGINS NOW

The duty to preserve attaches on receipt of this notice and does not wait for a complaint to be filed. Please suspend immediately, and until further written notice, every automatic deletion, retention purge, expiration timer, archiving process, overwrite, and backup rotation that could affect the material described below, and please issue a written litigation hold to the custodians identified below.

RELEVANT TIME PERIOD

Primary period: January 1, 2024 through the present, and continuing until this notice is withdrawn in writing.

Extended period: June 1, 2021 through the present, limited to materials concerning the design, authorization, procurement, actuarial development, or bid pricing of the Battle Born State Plan program, including the State's request for proposals and any response to it.

CUSTODIANS

1. Ross E. Armstrong, Esq., Executive Director [redacted]

2. Elizabeth J. Bassett, Esq., Commission Counsel, and Curtis Hazlett, JD, Associate Counsel [redacted]

3. Erron Terry, [redacted]

4. Scott Scherer, Esq., Chair, [redacted] Vice Chair Kim Wallin, CPA, CMA, CFM, and Commissioners Michael E. Langton, Esq., Teresa Lowry, Esq., John Miller, John T. Moran III, Esq., Terry J. Reynolds, and Brianna Smith, Esq.

5. The custodians of the Commission's [redacted]

6. Each individual who administers the Commission's case management system, its document

[redacted]

opinion, inquiry, or referral concerning the Battle Born State Plan program, producer or broker compensation, or any officer or employee of the Nevada Health Authority or the Silver State Health Insurance Exchange, with the identifying details of other parties preserved in place and not disclosed.

7. The Commission's records retention schedule and destruction logs [redacted] and the configuration settings governing automatic deletion in the systems holding that file.

SYSTEMS AND REPOSITORIES

For each custodian and for the Commission generally, wherever located and whoever administers them, including systems operated by a vendor or another State entity on the Commission's behalf: electronic mail in all forms (archives, journaled copies, shared and delegated mailboxes, distribution lists, local store files, deleted items and recovery folders, any personal account used for State business); instant messaging and collaboration platforms (Microsoft Teams, Slack, Google Chat, Zoom chat, Webex; direct messages, private channels, anything set to expire automatically); text and multimedia messages on issued and personal devices; voicemail and call recordings; video conference recordings, automated transcripts, chat logs, attendee logs, host action logs; calendars, meeting invitations, meeting notes, including cancelled and deleted entries; SharePoint, OneDrive, Google Drive, Box, Dropbox, network file shares, local drives; the complaint intake and case management systems, including intake logs, screening records, status histories, and closure codes; the document management system and any workpaper or deliberation repository; meeting agenda, packet, recording, transcript, and minutes systems, including drafts; conflict, recusal, and disclosure records systems; records retention, disposition, and destruction logging systems, together with the configuration settings governing automatic deletion; structured databases, reporting environments, and analytics platforms, including queries and reports run against them; backup media, snapshots, disaster recovery copies, archive and cold storage tiers; paper files, notebooks, handwritten notes, printed materials.

PRESERVATION DIRECTIVES

1. Suspend, immediately and until further written notice, every automatic deletion, expiration, purge, archiving, and overwriting process that could affect the material described above, including mailbox size limits, message retention policies, ephemeral messaging timers, and routine destruction under any records retention schedule.

2. Suspend the rotation, recycling, reformatting, and overwriting of backup media that may contain such material.

3. Preserve each item in its native format with all metadata intact, including sender and recipient fields, blind copy recipients, dates and times, revision and version history, tracked changes, comments, and embedded or linked attachments. A printed copy or a screen image is not a substitute for the native file.

4. Do not re-image, wipe, reassign, decommission, or dispose of any computer, mobile device, or storage medium used by a custodian, and preserve a forensic image of the device of any custodian who leaves the agency before this matter concludes.

5. Do not migrate, consolidate, upgrade, or decommission any system identified above without first preserving the data in it in a form that remains usable and searchable.

6. Instruct every custodian in writing, promptly, and maintain the written hold notice, the distribution list, the acknowledgments received, and the dates of each, all of which should themselves be preserved.

7. Notify any vendor, consultant, contractor, or other State entity that holds relevant material on the agency's behalf, and confirm that it has taken the same steps.

8. Identify and preserve the retention policies, deletion schedules, and system configuration settings that were in effect during the relevant period, since the question of what was destroyed and when may itself become material.

CONSEQUENCES OF LOSS

Loss, deletion, alteration, or overwriting of material within the scope of this notice after its receipt may support sanctions and an adverse inference. If any such material has already been lost, please identify what it was, when and how it was lost, and whether a copy survives in a backup, an archive, or the file of another custodian. A loss disclosed promptly is treated very differently from one discovered later.

TWO POINTS SPECIFIC TO A PUBLIC BODY

First, this message is a preservation notice only. Any request for records under the Nevada Public Records Act, NRS Chapter 239, will be made separately and in its own correspondence, and nothing here should be treated as such a request or as starting any period for responding to one. Second, the preservation obligation described here is independent of the retention schedule of the Commission. Where the two conflict, the obligation to preserve controls, and destruction that would otherwise be routine should be suspended.

PLEASE CONFIRM

Please confirm in writing within ten days of receipt that a litigation hold has been issued, and identify the person responsible for administering it. If you believe the scope stated here is broader than is appropriate, please say so in writing, so that any narrowing of scope is documented rather than left to recollection.

Sincerely,

Derek Berger
Brokers Broker
Nevada Producer License [redacted] | Nevada Agency License [redacted]

Outlook

**Second request; litigation hold confirmation not received; Battle Born State Plan producer compensation, plan years 2026 and 2027;** [redacted]

**From** Derek Berger <[redacted]
**Date** Fri 8/14/2026 12:20 PM
**To** Nevada Commission on Ethics <ncoe@ethics.nv.gov>

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Derek Berger | Brokers Broker
[redacted] NV Producer Lic. #[redacted] | Agency Lic. #[redacted]

Nevada Commission on Ethics
Attn: Ross E. Armstrong, Esq., Executive Director, and Elizabeth J. Bassett, Esq., Commission Counsel
704 W. Nye Lane, Carson City, NV 89703

Re: Second request; litigation hold confirmation not received; Battle Born State Plan producer compensation, plan years 2026 and 2027; [redacted]

This message is sent to the general mailbox of the Commission because it is the address the Commission publishes. Please route it to the Executive Director, to Commission Counsel, and to the person responsible for the Commission's records retention.

Director Armstrong:

WHAT WAS SENT, AND WHEN

On July 28, 2026, Derek Berger and Brokers Broker sent the Commission a notice to preserve evidence concerning producer compensation on the Battle Born State Plans for plan years 2026 and 2027, and [redacted] It went by certified mail, return receipt requested, article number 9589 0710 5270 2613 6447 39, with Schedule A and Schedule B, and by electronic mail to this address on the same day. Receipt on July 28, 2026 is established by the Commission's written acknowledgment of July 30, 2026; the return receipt for the article will complete the record when it returns. The notice asked for written confirmation within ten days of receipt that a litigation hold had been issued. That period has now closed, and no confirmation has been received. The Commission's acknowledgment of July 30, 2026 is noted; it addressed receipt and the separate records request, extending that production to August 31, 2026, and it did not confirm that a litigation hold has issued.

THIS IS A SECOND REQUEST

It asks for the same three things the first notice asked for, and nothing more.

1. Written confirmation that a litigation hold has been issued.

2. The name and title of the person responsible for administering it.

3. Any objection to the scope stated in the notice, in writing, so that any narrowing of scope is documented rather than left to recollection.

It asks that nothing be produced. It is not a request for records and it is not a discovery demand.

CONFIDENTIALITY IS NOT AN ANSWER TO THIS REQUEST

Proceedings of the Commission are confidential under NRS Chapter 281A. Nothing in the original notice or in this message asks that any confidential material be disclosed. Those provisions govern disclosure. They do not govern retention, [redacted] Confirming that a hold has issued discloses nothing confidential. If the Commission's retention schedule would otherwise permit destruction of the record of a matter that has been closed or in which jurisdiction was declined, [redacted]

THE OBLIGATION HAS BEEN RUNNING SINCE DELIVERY

The duty to preserve attached on receipt of the original notice. It did not wait for the ten day period to close, it does not depend on a response, and it continues to run now. Every automatic deletion, retention purge, expiration timer, archiving process, overwrite, and backup rotation that could affect the material described in the notice should already be suspended. If any of that has not yet been done, please do it immediately.

THE SCOPE HAS NOT CHANGED

The original notice, with Schedules A and B, remains in effect exactly as sent, and nothing here narrows, expands, or supersedes it. [redacted] If the Commission's copy has been misplaced, say so and a duplicate will be sent the same day.

TWO POINTS SPECIFIC TO A PUBLIC BODY

First, this message is a preservation notice only. Any request for records under the Nevada Public Records Act, NRS Chapter 239, will be made separately and in its own correspondence, and nothing here should be treated as such a request or as starting any period for responding to one. Second, the preservation obligation described in the original notice is independent of the retention schedule of the Commission. Where the two conflict, the obligation to preserve controls, and destruction that would otherwise be routine should be suspended.

IF A HOLD HAS ISSUED AND THE CONFIRMATION SIMPLY DID NOT REACH ME

That is easily resolved. A short message saying that the hold issued, when it issued, and who administers it is all that is needed. This message is not an accusation that nothing was done. It records

that nothing has been received.

CONSEQUENCES OF LOSS

Loss, deletion, alteration, or overwriting of material within the scope of the notice after its receipt may support sanctions and an adverse inference. If any such material has already been lost, please identify what it was, when and how it was lost, and whether a copy survives in a backup, an archive, or the file of another custodian. A loss disclosed promptly is treated very differently from one discovered later.

PLEASE RESPOND

Please respond in writing within ten days of this message. The absence of a response is being recorded, and this correspondence will form part of the record in the anticipated proceedings.

Sincerely,

Derek Berger
Brokers Broker
Nevada Producer License [redacted] | Nevada Agency License [redacted]

State of Nevada Commission on Ethics

Public Records Request

**Submitted Electronically on:**

| Requestor Contact Information | |
|---|---|
| Name: | Mayes, Gerald |
| Organization: | NAACP Las Vegas #1111 |
| Address: | [redacted] |
| Phone: | [redacted] |
| E-mail: | [redacted] |

| Requested Record(s) Details | |
|---|---|
| Delivery Method: | Deliver by E-mail |
| I am requesting a full list of all investigation complaint cases (not just those that went to hearing) the commission filed going back to January 2000. | |

☑ I certify that the information I provided is true and correct to the best of my knowledge. I understand that copying and other direct costs (ink, toner, paper, media, postage, etc.) may apply and that records will not be released until the estimated fee deposit is received.

☑ By signing this document electronically, which is legally equivalent to a handwritten signature, I fully acknowledge that my electronic signature reflects my intent to validate and endorse the contents of this document; furthermore, I confirm that I have the necessary ability and authorization to sign electronically and am doing so knowingly, with the full intent of establishing a binding and authenticated record.

Signature: [redacted]

Sign Date: 03/11/2026

704 W. Nye Lane Suite 204 Carson City, NV 89703
Tel: 775-687-5469 | Fax: 775-687-1279
ncoe@ethics.nv.gov | https://ethics.nv.gov

# NEVADA PUBLIC RECORDS ACT REQUEST

**NRS CHAPTER 239 | 5 U.S.C. § 552 (FEDERAL FOIA)**

**SUBMITTED TO:**

## NEVADA COMMISSION ON ETHICS

704 W. Nye Lane, Suite 204, Carson City, NV 89703

(775) 687-5469 | ethics@ethics.nv.gov

| | |
|---|---|
| FROM: | Rachel Provstgaard |
| ADDRESS: | [redacted] |
| EMAIL: | [redacted] |
| ON BEHALF OF: | Sheril Willis Provstgaard |
| DATE: | March 3, 2025 |
| RE: | Ethics filing compliance records for all Nye County public officers and employees listed herein who have exercised authority over or had involvement in matters affecting Sheril Willis Provstgaard |
| CASE NUMBERS: | CR23-0140; 22 CR 00123 5K; 23 CR 00098 5K; 23 CR 00118 5K; Lynda Seeger case (Sheril Willis Provstgaard as victim, approx. 2022–2024) |
| TIMEFRAME: | January 1, 2010 through the present date |
| RESPONSE DUE: | Within 5 business days of receipt — NRS 239.0107 |

## I. LEGAL BASIS FOR THIS REQUEST

This request is submitted by Rachel Provstgaard on behalf of her brother, Sheril Willis Provstgaard, whose criminal cases are identified above. The requester seeks documentary confirmation of ethics filing compliance for each Nye County public officer or employee named herein who has exercised governmental authority or had direct involvement in matters affecting Sheril Willis Provstgaard.

NEVADA PUBLIC RECORDS ACT — NRS 239.010: All public books and records of a governmental entity are open to inspection by any person at any reasonable time. The burden rests entirely on the government to justify any withholding. Under NRS 239.0107, the Commission must respond within five (5) business days of receipt. Any denial must state the specific statutory basis in writing. A blanket or unsupported denial is unlawful.

FEDERAL FREEDOM OF INFORMATION ACT — 5 U.S.C. § 552: To the extent any records requested herein are held by or transmitted to any federal agency, or involve any federal program or funding, this request is simultaneously submitted as a federal FOIA request requiring response within twenty (20) business days. Any withholding requires a Vaughn index and specific exemption citation.

ETHICS IN GOVERNMENT — NRS CHAPTER 281A: Under NRS 281A.500, every public officer must file an ethics acknowledgment within 30 days of taking office or by January 15 following a general election. Under NRS 281A.600, public officers must file annual financial disclosure statements. Under NRS 281A.550, amended disclosures are required within 30 days of any material change in financial interests. The Nevada Commission on Ethics is the custodian of all such filings and is the proper respondent to this request.

**NOTE ON SCOPE — 'PUBLIC OFFICER OR EMPLOYEE': This request intentionally uses the term 'public officer or employee' as defined broadly under NRS 281A.065 and NRS 281.005, which includes elected officials, appointed officials, deputies, investigators, law enforcement officers, and county employees exercising governmental authority. All persons listed in this request fall within this definition by virtue of their employment with or contractual service to Nye County government.**

## II. RECORDS REQUESTED

For each of the thirty (30) Nye County public officers and employees identified in the table below, please produce ALL of the following categories of records:

(a) All ethics acknowledgment forms filed under NRS 281A.500, for every term or period of service within the applicable timeframe, including the EXACT DATE each filing was received by the Commission.

(b) All financial disclosure statements filed under NRS 281A.600, for every applicable period, including the EXACT DATE each filing was received.

(c) All amended disclosure statements filed under NRS 281A.550 reflecting any material change in financial interests.

(d) Written confirmation — on Commission letterhead — if NO filings are on record for any person for any applicable period. This written confirmation of absence of filing is itself a public record and is affirmatively requested.

(e) If any filing was received AFTER the applicable statutory deadline, identify: the date received, the applicable deadline, and the number of days the filing was delinquent.

(f) All communications between the Commission and the named person regarding compliance, delinquency notices, cure letters, extension requests, or waivers.

(g) All civil penalties assessed against the named person under NRS 281A.790.

(h) All formal ethics complaints filed against the named person, including date filed, nature of complaint, and final disposition.

(i) All records of any public reprimands issued under NRS 281A.780.

(j) All records of any criminal referrals made under NRS 281A.800.

## THE FOLLOWING THIRTY (30) NYE COUNTY PUBLIC OFFICERS AND EMPLOYEES ARE SUBJECT TO THIS REQUEST:

| # | FULL NAME | TITLE / POSITION | DEPARTMENT / AGENCY | PERIOD |
|---|---|---|---|---|
| 1 | Jennifer Klapper | Justice of the Peace | Tonopah Justice Court | 2013–Present |
| 2 | William 'Gus' Sullivan | Justice of the Peace | Beatty/Pahrump Justice Court | Unknown–Present |
| 3 | Robert W. Lane | District Court Judge, Dept. 2 | Fifth Judicial District Court | Unknown–Present |

| | | | | |
|---|---|---|---|---|
| 4 | Kimberly A. Wanker | District Court Judge, Dept. 1 | Fifth Judicial District Court | Unknown–Present |
| 5 | Brian T. Kunzi | District Attorney (two terms) | Nye County DA's Office | 2011–2015; 2023–Present |
| 6 | Patrick A. Ferguson | Senior Deputy District Attorney | Nye County DA's Office | Approx. 2015–Present |
| 7 | Chris Arabia | Former District Attorney | Nye County DA's Office | 2019–2023 |
| 8 | Angela Bello | Former District Attorney | Nye County DA's Office | 2015–2019 |
| 9 | Robert S. Beckett | Former District Attorney | Nye County DA's Office | 1994–2010 |
| 10 | Kirk D. Vitto | Former Chief Deputy DA / Interim DA | Nye County DA's Office | Approx. 2009–2015 |
| 11 | Brent Perceval | Senior Deputy District Attorney | Nye County DA's Office | Unknown–Present |
| 12 | John Friel | Deputy District Attorney | Nye County DA's Office | Unknown–Present |
| 13 | Kelly Blatnik Ford | Contracted Public Defender | Nye County Public Defender Services | Unknown |
| 14 | Jason Earnest | Contracted Public Defender | Mountain West Lawyers / Nye County | 2000–Present |
| 15 | Joe McGill | Sheriff | Nye County Sheriff's Office | Unknown–Present |
| 16 | Harry Means | Undersheriff | Nye County Sheriff's Office | Unknown |
| 17 | William Becht | Captain (former Undersheriff) | Nye County Sheriff's Office | Unknown |
| 18 | David Boruchowitz | Detective / Former Spokesman | Nye County Sheriff's Office | Approx. 2008–Unknown |
| 19 | Jason Blackburn | Sergeant | Nye County Sheriff's Office | Unknown–Present |
| 20 | Ricardo Ramirez | Sergeant | Nye County Sheriff's Office | Unknown–Present |
| 21 | Morgan Dillon | Sergeant / Investigator | Nye County Sheriff's Office | Unknown–Present |
| 22 | Richard Rumker | Deputy / K-9 Handler | Nye County Sheriff's Office | Unknown–Present |
| 23 | Mark Kibirus (spelling unconfirmed) | Sergeant | Nye County Sheriff's Office | Unknown |
| 24 | Mark Murphey | Deputy or Sergeant | Nye County Sheriff's Office | Unknown |
| 25 | Thomas Boni | Deputy | Nye County Sheriff's Office | Unknown–Present |

| | | | | |
|---|---|---|---|---|
| 26 | Alvin Hill | Deputy | Nye County Sheriff's Office | Unknown–Present |
| 27 | Jim Basinger | County Employee | Nye County | Unknown |
| 28 | Dillon Otteson | County Employee | Nye County | Unknown |
| 29 | Reyna Martin | County Employee | Nye County | Unknown |
| 30 | Roy Nelson | Public Works Employee | Nye County Public Works | Unknown |

*NOTE: Where the period of service is listed as 'Unknown,' the Commission is requested to search all records for any period in which that individual may have been registered as a public officer or employee with Nye County and to confirm in writing whether any ethics filings exist.*

*NOTE: 'Mark Kibirus' — spelling of surname unconfirmed. The Commission is requested to search records under all phonetically similar spellings.*

## III. ADDITIONAL COMMISSION RECORDS REQUESTED

### A. Commission Policies and Enforcement

1. All current Commission policies, procedures, and guidelines regarding enforcement of timely filing requirements under NRS 281A.500 and NRS 281A.600 for public officers and employees of Nye County.

2. All records of any systemic review, audit, or compliance assessment of Nye County public officers or employees conducted by the Commission at any time.

3. All delinquency notices, warning letters, or cure demands issued to any Nye County public officer or employee for failure to timely file under NRS Chapter 281A.

4. All records of any Commission-initiated investigations into any Nye County public officer's or employee's ethics compliance.

### B. Commission Forms and Instructions

5. The current form and complete instructions for filing a formal ethics complaint against a public officer or employee with the Nevada Commission on Ethics.

6. The current ethics acknowledgment form (NRS 281A.500) and current financial disclosure form (NRS 281A.600) along with all current filing instructions.

## FORMAT AND DELIVERY

Please produce all responsive records electronically in PDF format to dueprocessai@gmail.com. If electronic production is not possible, please produce records by certified mail to PO Box 393, Gabbs, NV 89409. For any record withheld in whole or in part, you are required under NRS 239.0107(4) to provide a written index identifying each withheld document and the specific statutory exemption claimed. Blanket denials without document-by-document justification are unlawful.

## NOTICE OF LEGAL CONSEQUENCES FOR NON-COMPLIANCE

Failure to respond within five (5) business days of receipt, failure to produce responsive records without lawful justification, or an unlawful denial of this request may subject this agency and its responsible officers to: (a) court-ordered production under NRS 239.011; (b) an award of attorney's fees and costs to the requester; and (c) referral to the Nevada Attorney General's Office. All records produced or withheld will be preserved as evidence in all pending and future legal and administrative proceedings relating to the above-referenced cases.

Respectfully submitted,

Signature: _____

Printed Name: Rachel Provstgaard

On Behalf of: Sheril Willis Provstgaard

Date: March 3, 2025

Email: [redacted]

Mailing Address: [redacted]

*CERTIFICATE OF SERVICE: This request is submitted by certified mail with return receipt requested and simultaneously by email to ethics@ethics.nv.gov. The requester will retain all proof of delivery as evidence of timely submission. Certified mail tracking number: _____ (to be completed upon mailing).*

# NEVADA PUBLIC RECORDS ACT REQUEST

**Date:** July 6, 2026

**To:**
Public Records Officer
Nevada Department of Education
700 E. Fifth Street
Carson City, Nevada 89701

**Hand Delivered**

**From:**

Drew Ribar
Auditing Reno 911
[redacted]

## RE: Public Records Request Concerning Educator Conduct, Parental Notification Policies, Licensure Complaints, and State Oversight

Dear Public Records Officer:

Pursuant to the Nevada Public Records Act, NRS Chapter 239, I request to inspect and obtain copies of the following public records in the possession, custody, or control of the Nevada Department of Education.

Unless otherwise specified, the time period for this request is **January 1, 2023, through the date this request is fulfilled.**

This request includes all records regardless of format, including but not limited to emails, letters, memoranda, reports, notes, investigative files, text messages, Microsoft Teams messages, Slack messages, electronic communications, audio recordings, video recordings, and documents maintained on government-issued or personal devices if they concern the transaction of public business.

Please provide the following:

### I. Christopher Michael Segal

1. All complaints, reports, referrals, or allegations received by the Nevada Department of Education concerning Christopher Michael Segal (also known as Christopher Segal or "Mx. Segal"), employed by the Clark County School District.
2. All investigative records, case files, correspondence, findings, reports, recommendations, disciplinary actions, or licensing reviews concerning Christopher Michael Segal.
3. All communications between the Nevada Department of Education and the Clark County School District concerning Christopher Michael Segal.
4. All communications referencing:

- Christopher Segal
- Christopher Michael Segal
- Mx. Segal
- Gunderson Middle School
- O'Keefe Media Group
- James O'Keefe
- undercover video
- pronouns
- parental notification
- gender identity
- preferred pronouns

## II. Statewide Guidance

Please produce all records concerning statewide policies, directives, guidance, recommendations, memoranda, training materials, presentations, manuals, bulletins, or legal opinions concerning:

- student gender identity;
- preferred names or preferred pronouns;
- parental notification;
- parental consent;
- confidentiality of student gender identity;
- teacher responsibilities regarding gender identity;
- classroom discussions regarding gender identity;
- educator professional conduct involving these subjects.

## III. Complaints and Investigations

Please provide records sufficient to identify:

1. The total number of complaints received by the Nevada Department of Education since January 1, 2023, alleging:

- failure to notify parents regarding gender identity;
- educators concealing information from parents;
- inappropriate classroom discussions concerning sexuality or gender identity;
- violations of educator professional standards related to these issues.

2. Final investigative findings for such complaints, with personally identifying student information redacted as required by law.

## IV. Licensure Standards

Please provide:

- policies governing educator discipline for unprofessional conduct;
- policies defining "immorality," "unprofessional conduct," or "evident unfitness";
- Commission on Professional Standards guidance concerning these subjects;
- any advisory opinions issued relating to these issues.

## V. Communications With Other Agencies

Please produce all communications between the Nevada Department of Education and:

- Clark County School District;
- the Nevada Attorney General;
- the Governor's Office;
- the Commission on Professional Standards in Education;

concerning:

- Christopher Michael Segal;
- parental notification policies;
- student gender identity;
- educator discipline relating to these topics.

## VI. Media and Public Relations

Please provide all communications concerning:

- O'Keefe Media Group;
- James O'Keefe;
- media inquiries;
- press statements;
- talking points;
- public relations responses;
- crisis communications;

related to this incident.

## VII. Search Requirements

Please search records maintained on:

- Department email systems;
- Microsoft Teams;
- archived email;
- text messages;
- personal devices used for public business;
- cloud storage;
- electronic document management systems.

## VIII. Production

I request these records electronically whenever possible.

If any portion of a record is exempt from disclosure, please redact only the exempt material and produce the remainder pursuant to NRS 239.010.

For every withheld or redacted record, please identify:

- the specific record withheld;
- the statutory exemption relied upon;
- the legal basis supporting the withholding.

If any request is unclear, please contact me so it may be clarified rather than denied.

If estimated fees exceed $25.00, please notify me before processing.

Thank you for your prompt attention to this request.

Respectfully,

**Drew Ribar**
Auditing Reno 911
[redacted]

STATE OF NEVADA

# Public Records Request

5500 Snyder Avenue
Carson City, Nevada 89701

Department of Corrections (NDOC)
email: publicrecords@doc.nv.gov

## Attention: Public Information Officer

| Date of Request | |
|---|---|
| **Requestor Contact Information** | |
| Name: | |
| Organization: | |
| Address: | |
| City, State, Zip: | |
| Phone: | |
| E-mail: | |

**Records Requested:**

Check one: ☐ Paper copies ☐ Electronic copies ☐ Certified copies ☐ Inspection (in person)

*Please be specific and include as much detail as possible regarding the records you are requesting.*

*To complete an estimate, the agency will need the following information:*

| ☐ I will pick up | ☐ Please FedEx<br>*Fed Ex billing number:* | ☐ Please send USPS | ☐ E-mail (if format allows) |
|---|---|---|---|

**Statement**

☐ I understand there is a charge for copies of public records. I understand I will receive a written estimate for production of the records indicated above if the estimated cost is expected to be over $25.00, which I will be required to pay in full prior to inspection or reproduction. Materials will be held for 30 days.

**Requester Signature** [redacted]

Signature

**Office Use Only**

| Request status: | | Estimate: | |
|---|---|---|---|
| Date | | | |
| _____ | Request received | Estimate: | $ |
| _____ | Receipt acknowledgement issued | Date deposit received | _____ |
| _____ | Request filled | Actual (if different): | $ _____ |
| _____ | Estimated completion | Date final payment received | _____ |
| _____ | Estimate provided | Completed by | _____ |
| _____ | Request denied in whole | | |
| _____ | *Other:* | *Retain request form for three (3) calendar years from the end of the calendar year in which the response was completed according to RDA 2015013* | |

Date: 9/18/26

To: Nevada Department of Corrections
Submitted via online portal

Re: Public records request – Healthcare statistics and cost estimates for electronic medical records

To whom it may concern:

ACLU Nevada

4362 W. Cheyenne Ave.
North Las Vegas, NV 89032
702-366-1226
aclunv.org

This letter serves as a request under the Nevada Public Records Act, NRS § 239 *et seq*, by the American Civil Liberties Union of Nevada (ACLUNV) for public records held by the Nevada Department of Corrections and its associated subdivisions as detailed below.

**A. The Requester**

The ACLUNV is a statewide affiliate of the American Civil Liberties Union, a national organization whose work protects the civil liberties and civil rights of all people. Our mission includes safeguarding the basic constitutional rights to due process, equal protection, and the civil rights of marginalized communities including individuals in the criminal legal system. One of the ACLUNV's main functions is disseminating information to the public about issues of concern to the ACLUNV and its members.

**B. Request**

The ACLUNV requests, in electronic format where available and pursuant to NRS 239.010(3-5):

As this is a large request, please feel free to release records in batches as they become available. Timeframes for individual requests, unless otherwise stated, should be between 2021 and 2026.

1. All records related to electronic medical record systems, including:

a. Emails, memoranda, agendas, bill draft requests, budget proposals, and reports containing keywords: "electronic medical records," "update medical records"

2. All records related to paper medical record systems, including:

a. Emails, memoranda, agendas, bill draft requests, budget proposals, and reports containing keywords: "paper medical records," "medical AND record AND (inefficient OR outdated)"

3. All records related to delayed scheduling for medical care, including:

a. Emails, memoranda, agendas, and reports containing keywords: "(medical OR health OR doctor OR clinic) AND (schedule OR appointment) AND (delay OR missed OR cancelled OR urgent)"

ACLU Nevada

4362 W. Cheyenne Ave.
North Las Vegas, NV 89032
702-366-1226
aclunv.org

b. Any records containing statistics, audits, evaluations, or internal reviews related to delays in scheduling medical care

c. Any records containing statistics, audits, evaluations, or internal reviews related to response times for kites and grievances related to medical care

d. Any records containing statistics, audits, evaluations, or internal reviews related to processing times for the Utilization Review Committee

4. Any records containing anonymized statistics related to the number of offenders in NDOC custody diagnosed with or receiving treatment for the following medical conditions:

a. gastrointestinal cancer or stomach cancer

b. colorectal cancer or colon cancer

c. skin cancer or melanoma

d. breast cancer

e. cervical cancer

f. lymphoma

g. deep vein thrombosis

h. pulmonary embolism

i. Von Willebrand Disease

j. leukemia

k. spinal stenosis

l. herniated disc

m. chronic pain

n. chronic kidney disease

5. Any emails, memoranda, or redacted URC records containing the keywords: ("Eliquis" OR "apixaban") AND ("cost" OR "price" OR "approved" OR "denied")

6. Any records containing statistics, audits, evaluations, or internal reviews related to the number of anonymized offenders who have received pap smears/cervical cancer screenings, mammograms, breast examinations, pelvic/vaginal examinations between June 2023 and the present

7. Any records related to amounts billed to Nevada Medicaid, Clark County, and Washoe County for offender medical care. These numbers can be provided in aggregate form by fiscal year or in whatever format is most convenient

ACLU Nevada

4362 W. Cheyenne Ave.
North Las Vegas, NV 89032
702-366-1226
aclunv.org

## C. Waiver of Fees

The ACLUNV requests a waiver of fees associated with this request.

In relation to both federal and state public records requests, fees are generally waived for nonprofit organizations seeking copies of materials without commercial interest and for the purpose of contributing to public understanding and education. See *Friends of the Coast Fork v. U.S. of the Interior*, 110 F.3d 53 (9th Cir. 1997); *Friends of Oceano Dunes, Inc. v. Salazar*, No. C-11-1476 EMC, 2011 WL 6748575 (N.D. Cal. Dec. 22, 2011); *North Cnty. Parents Org. for Children with Special Needs v. Dep't of Educ.*, 23 Cal. App. 4th 144 (Cal. Ct. App. 1994).

Here, the documents requested benefit the public's knowledge and are not sought for commercial interest. As a nonprofit 501(c)(3) and 501(c)(4) organization, the ACLUNV is well situated to disseminate information it gains from this request to the general public as well as to other targeted communities. Dissemination of information to the public is a critical and substantial component of ACLUNV's mission and work.

## D. Fulfillment of Request

The State of Nevada mandates that all state agency records are public unless declared confidential by law. NRS § 239.010. Recent changes to the Public Records Act reaffirm the state's commitment to transparency and maximizing the public's right of access to agency records. NRS § 239.001.

As of October 1, 2019, Nevada law imposes additional duties on governmental entities to fulfill requests. If a governmental entity willfully fails to comply with any provision of NRS § 239 *et* seq, it is subject to up to $10,000 in civil penalties "in addition to any other rights or remedies that may exist in law or in equity." NRS § 239.340.

ACLU Nevada

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aclunv.org

If all or any part of this request is denied, Nevada law requires that you provide the ACLUNV a written statement of the grounds for the denial, citing the law or regulations under which you believe you may deny access for each document. NRS 239.0107. Furthermore, if you determine that some portions of the requested records are exempt from disclosure, we expect that you provide us with any reasonable severable portion of the records sought.

Please be advised that if any refusal to disclose is based on confidentiality, then "[t]he public official or agency bears the burden of establishing the existence of privilege based upon confidentiality. It is settled that privileges, whether creatures of statute or the common law, should be interpreted and applied narrowly." *D.R Partners v. Board of County Com'rs of Clark County*, 116 Nev. 616, 622 (2000).

Pursuant to state law, we request copies and/or access to these public records be forwarded to the ACLUNV within five (5) business days of this letter, by 9/25/26. NRS 239.0107(1). If you are unable to make the records available by this date, you are statutorily required to state that fact in writing explaining why the book or record is unavailable and a date and time when the record will be available. NRS 239.1007(1)(c)(1).

The updated Public Records Act imposes a duty on governmental entities to "make a reasonable effort to assist the requester to focus the request such a manner as to maximize the likelihood the requestor will be able to access the public book or record as expeditiously as possible." NRS 239.1007(1)(c)(2). Please contact the ACLUNV within the five (5) day statutory time frame if, for some reason, this request requires clarification.

Please forward copies of documents as they are identified, even if production is not fully complete. We appreciate your assistance with this request. You may contact me directly at bennett@aclunv.org.

Best,

Danielle Bennett
Prisoners Rights Attorney
American Civil Liberties Union of Nevada

ACLU
Nevada

4362 W. Cheyenne Ave.
North Las Vegas, NV 89032
702-366-1226
aclunv.org

# STATE OF NEVADA

## Department of Administration
## Public Records Request

Deliver, Mail, or Email to:
209 E. Musser St. Suite 304 Carson City, NV 89701 Email: deptadmin@admin.nv.gov
Attention: Director's Office Information Officer

DEPARTMENT OF ADMINISTRATION
OFFICE OF THE DIRECTOR
RECEIVED
OCT 09 2026

| | |
|---|---|
| **Date of Request** | 9/30/2026 |
| **Requestor Contact Information** | |
| Name: | Kurt D. Anderson |
| Organization: | Shook & Stone, CHTD. |
| Address: | [redacted] |
| City, State, Zip: | |
| Phone: | |
| E-mail: | |

**Records Requested:**

Check one: ☐ Paper copies ■ Electronic copies ☐ Certified copies ■ Inspection (in person)

*Please be specific and include as much detail as possible regarding the records you are requesting.*

See attached

*To complete an estimate, the agency will need the following information:*

| | | | |
|---|---|---|---|
| ☐ I will pick up | ☐ Please FedEx<br>*Fed Ex billing number:* | ■ Please send USPS | ■ E-mail (if format allows) |

**Statement**

■ I understand there is a charge for copies of public records. I understand I will receive a written estimate for production of the records indicated above if the estimated cost is expected to be over $25.00, which I will be required to pay in full prior to inspection or reproduction. Materials will be held for 30 days.

**Requester Signature** [redacted] Signature

**Office Use Only**

| Request status: | | Estimate: | |
|---|---|---|---|
| Date | | | |
| _____ | Request received | Estimate: | $ _____ |
| _____ | Receipt acknowledgement issued | Date deposit received | _____ |
| _____ | Request filled | Actual (if different): | $ _____ |
| _____ | Estimated completion | Date final payment received | _____ |
| _____ | Estimate provided | Completed by | _____ |
| _____ | Request denied in whole | | |
| _____ | *Other:* | *Retain request form for three (3) calendar years from the end of the calendar year in which the response was completed according to RDA 2015013* | |

**PUBLIC RECORDS REQUEST**
**(Nevada Public Records Act – NRS Chapter 239)**

To: Custodians of Record

| | | |
|---|---|---|
| Nevada Public Works Division<br>Buildings and Grounds<br>2300 McLeod Dr, Las Vegas, NV 89104 | Nevada Public Works Division<br>Facility Condition Assessment<br>Ken Forbes, Construction Project Coordinator III<br>kforbes@admin.nv.gov<br>Carol Myers<br>mc.myers@admin.nv.gov | Nevada Public Works Division<br>Building Maintenance<br>CMMS and Maximo records |

Date: 9/30/26

**Re: Public Records Request for records relating to the Indian Springs Correctional Center Complex 9952 – High Desert State Prison Site 22010 Cold Creek Road, Indian Springs, Nevada**

I. Cell door, lock, and security systems for Housing Units 9, 10, 11 and 12 original construction.

Please produce all records relating to the construction, installation, manufacture, operation, failure, bypass, manipulation, defect, maintenance, repair, inspection, replacement, or known vulnerability of any cell door, lock, latch, controller, override mechanism, or related security system relevant to the housing unit, area, or circumstances from the date of original construction in 2009. This disclosure should include, but not be limited to:

1. Construction blueprints and drawings.
2. Identity of the general contractor and subcontractors who constructed, assembled, or installed the cell doors, locks and related security systems.
3. The manufacturer(s) of the cell doors, locks and related security systems.
4. Warranties or guarantees made by the manufacturers of the cell doors, locks and related security systems.
5. Maintenance records, inspection records, work orders, service tickets, and repair logs as maintained on the CMMS and Maximo systems or their predecessors programs.

6. Reports of malfunction, bypass, tampering, unauthorized opening, or design vulnerability.

7. Records referencing known flaws, vulnerabilities, or workarounds which permitted prisoner access to the cells of other prisoners.

8. Vendor contracts, communications, proposals, warranty materials, manuals, defect notices, and service bulletins.

9. Records of prior complaints or reports involving similar door, lock, or confinement failures in the same unit or related systems.

II. For the capital improvement just bid for changes or upgrades to the cell doors, door locks and security systems for Housing Units 9, 10, 11 and 12.

10. Construction blueprints and drawings.

11. Identity of the general contractor and subcontractors who will construct, assemble, or install the cell doors, locks and related security systems.

12. The manufacturer(s) of the cell doors, locks and related security systems.

13. Warranties or guarantees made by the manufacturers of the cell doors, locks and related security systems.

III. For the time frame from the original construction to the date of the remodel of the facility with respect to the cell doors, door locks and security systems for Housing Units 9, 10, 11 and 12 please identify.

14. Incidents involving unauthorized inmate movement, cell door failures, bypassed locks, or inmate-on-inmate assaults facilitated by security door failures.
15. Records reflecting knowledge of such risks, including emails, warnings, memoranda, meeting minutes, or corrective recommendations.
16. Records concerning deaths or serious injuries in 2025 involving cell-door failures, unauthorized inmate movement, or failures to keep inmates confined.

IV. Communications regarding cell doors, door locks and security systems for Housing Units 9, 10, 11 and 12.

17. Emails.
18. Text messages.
19. Messaging platform communications.
20. Memoranda.
21. Letters and written correspondence.
22. Communications among line staff, supervisors, wardens, administrators, NDOC central office personnel, medical contractors, vendors, law enforcement, prosecutors, and public officials.
23. Communications with media or public-information personnel concerning the incident or death.

V. Preservation, retention of the records requested.

Please produce all records relating to preservation, retention, or destruction of responsive materials, including but not limited to:

24. Preservation notices or litigation hold notices.
25. Retention schedules applicable to video, logs, emails, texts, and other responsive records.
26. Records reflecting deletion, overwrite, destruction, loss, or corruption of responsive materials.
27. Records identifying who made any decision to preserve, not preserve, delete, overwrite, or dispose of responsive evidence.

VI. Search, production, and format

Please produce records in native electronic format where available, together with associated metadata and attachments.

If responsive records are maintained by a third party, contractor, or vendor on behalf of NDOC or HDSP, please identify that entity and produce responsive records in NDOC's possession, custody, or control, and identify any additional custodian believed to possess responsive materials.

In responding to this request, please identify:

1. The offices, institutions, departments, units, systems, and custodians searched.
2. The date ranges searched.
3. The categories of records searched.
4. Whether any potentially responsive records were not searched because of claimed burden, inaccessibility, or exemption.

VII. Withholding, redactions, and segregable material

If any record or portion of a record is withheld or redacted, please:

1. Identify the specific record or category of record withheld.
2. State whether the record is withheld in full or produced in redacted form.
3. Identify the specific statutory or other legal basis for withholding or redaction.
4. Produce all reasonably segregable nonexempt portions.
5. Provide a privilege or withholding log sufficient to assess the claim.

If any requested record does not exist, cannot be located, was destroyed, was overwritten, or is no longer available, please state that expressly and identify, if known, when and how that occurred.

VIII. Statutory response

Pursuant to NRS 239.0107, please provide a response within five business days, including production of records, a written statement of when records will be available, or the specific legal basis for any denial, withholding, or delay.

IX. Continuing request

This is a continuing request. If additional responsive records are identified after the initial response or production, please produce them promptly.

X. Certification of Records

Pursuant to NRS Chapter 239 and applicable evidentiary rules, please provide a written certification from the Custodian of Records (or other qualified records custodian) for all records produced in response to this request.

The certification shall:

1. Identify the custodian of records by name, title, and agency.
2. State that the records produced are true, correct, and complete copies of records maintained by the Nevada Department of Corrections and/or High Desert State Prison in the ordinary course of business.
3. State that the records were made at or near the time of the events recorded by, or from information transmitted by, a person with knowledge of those events.
4. State that the records are kept in the course of regularly conducted activity of NDOC/HDSP.
5. State that it is the regular practice of NDOC/HDSP to make and maintain such records.
6. Identify the systems, departments, or custodians from which the records were obtained.

7. Identify any categories of records that were not produced and the reason for nonproduction (e.g., do not exist, destroyed, withheld, or not located after a reasonable search).

The certification shall be provided in the form of a sworn declaration or affidavit, notarized, and compliant with NRS 53.045 (unsworn declarations) and NRS 52.260 (business records).

If different categories of records are maintained by different custodians (e.g., medical contractor, internal affairs, facility operations, or third-party vendors), please provide a separate certification for each custodian or entity.

| | |
|---|---|
| **From:** | Ashley Shead |
| **To:** | NDOC Public Records Request |
| **Subject:** | Public Records Request – Food Consumption and Loss Control Documentation (Per AR 269.03) |
| **Date:** | Thursday, October 9, 2025 1:32:40 PM |
| **Attachments:** | Public Records Request form Food Consumption and Loss Control Documentation (Per AR 269.03).pdf |

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

**From: Ashley Shead**

[redacted]

**To: Nevada Department of Corrections**
Public Records Officer
Nevada Department of Corrections
5500 Snyder Avenue, Bldg. 17
Carson City, NV 89701

**Date:** October 9th, 2025

**Subject:**

Dear Public Information Officer,

Pursuant to the Nevada Public Records Act, NRS 239.010 et seq., We are submitting this request for public records maintained by the Nevada Department of Corrections (NDOC).

Specifically, we are requesting copies of all Food Consumption and Loss Control documents maintained by the Food Service Manager (FSM) for each NDOC facility, as described in Administrative Regulation (AR) 269.03 – Food Service Manager Responsibilities, for the most recent twelve (12) months.

This request includes, but is not limited to:

- Monthly Food Consumption Reports submitted by FSMs to the NDOC Food Service Administrator or Warden;

- Loss Control Reports documenting food shortages, spoilage, overproduction, theft, or other discrepancies;

- Inventory and usage summaries that correspond to consumption tracking;
- Supporting “back documentation” (as referenced in AR 269.03) including worksheets, logs, or records used to verify data submitted in the monthly reports;
- Any related internal memoranda, communications, or audit summaries that accompany or explain these reports.

Please include records from October 1, 2024 through the date of this request.

If separate OPs exist for individual institutions (e.g., Ely State Prison, Lovelock Correctional Center, High Desert State Prison, Florence McClure Women’s Correctional Center, Southern Desert Correctional Center, Northern Nevada Correctional Center, Carlin Conservation Camp, Jean Conservation Camp, Pioche Conservation Camp, Stewart Conservation Camp, Stewart Conservation Camp, Three Lakes COnservation Camp), please include those versions as well.

Please provide the records in electronic format if available. If any portion of this request is denied, please provide the specific legal citation authorizing the withholding and describe the nature of the withheld material as required by NRS 239.0107(1)(d).

If any portion of this request is unclear or would benefit from clarification, please feel free to contact me. If the cost of fulfilling this request exceeds $25, kindly provide an estimate before proceeding.

Thank you in advance for your time and attention. We look forward to your response within five business days as required by Nevada law.

Sincerely,
Ashley Shead
[redacted]

(706)-974-4774

**From:** Amber Buell
**To:** NDOC Public Records Request
**Subject:** Public Records Request – NDOC Medical Contractor Insurance, Medical Malpractice & Surety/Bond Records
**Date:** Thursday, October 8, 2026 12:27:42 PM

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[You don't often get email from [redacted]. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification ]

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To: Nevada Department of Corrections – Public Records

Dear Public Records Officer:

Pursuant to the Nevada Public Records Act, I am requesting copies of public records relating to the medical services contractor providing services to the Nevada Department of Corrections (NDOC), including services provided at NDOC facilities in Clark County, Nevada.

I am specifically requesting the following records:

1. The complete executed contract and all amendments, renewals, extensions, exhibits, attachments, and addenda relating to contract 99SWC-NV20-5284 / 99SWC-S947, including the contract with Reliable Health Care Services of Southern Nevada, Inc.

2. The complete solicitation/RFP identified as 99SWC-S947, including all exhibits, attachments, addenda, questions and answers, and bid specifications.

3. Attachment BB – Insurance Schedule, including the complete original document and any revised or amended versions.

4. All insurance requirements applicable to the medical contractor, including required:
- Medical malpractice/professional liability insurance
- General liability insurance
- Automobile liability insurance
- Workers' compensation coverage
- Umbrella/excess liability coverage
- Any other required insurance

5. The specific minimum coverage limits required for each type of insurance, including per-occurrence and aggregate limits.

6. Copies of any certificates of insurance, declarations pages, insurance schedules, endorsements, or other documents submitted by the contractor to demonstrate compliance with NDOC/Nevada insurance requirements.

7. Copies of any documents identifying the State of Nevada, Nevada Department of Corrections, or other state entity as an additional insured, loss payee, certificate holder, or otherwise protected party.

8. Copies of any surety bond, performance bond, payment bond, fidelity bond, or other bond required of the medical contractor, including:
- The bond amount
- Surety company
- Effective and expiration dates
- Bond number
- Conditions of the bond

- Any amendments, riders, or renewals

9. Any records showing whether the medical contractor is required to maintain medical malpractice or professional liability coverage specifically for services provided to NDOC inmates, including the required policy limits and applicable exclusions or endorsements.

10. Any records identifying the NDOC facilities covered by the contract, including facilities located in Clark County, Nevada, and any allocation of services or coverage among those facilities.

11. Any notices of default, claims, insurance claims, bond claims, cancellations, non-renewals, or lapses in required insurance or bonding relating to this contract.

12. The Notice of Award, bid tabulation, evaluation/scoring documents, and any other records identifying the awarded contractor and the basis for the award.

13. Any subsequent contract, solicitation, amendment, or replacement agreement that currently provides medical services to NDOC facilities in Clark County, if contract 99SWC-NV20-5284 / 99SWC-S947 is no longer the controlling agreement.

I am requesting the records in electronic PDF format, if available.

If any portion of the requested records is exempt from disclosure, please provide the non-exempt portions and identify the specific statutory basis for withholding or redacting each withheld portion.

If the requested records are maintained by another Nevada state agency, department, or procurement office, please advise me of the appropriate agency or forward this request to the appropriate records custodian if permitted.

If there are fees associated with locating or reproducing these records, please provide an estimate before incurring fees.

Please also let me know if you need any additional information from me to process this request.

Thank you for your assistance.

Sincerely,

Amber Buell
Email: [redacted]

Outlook

# Public Records Request (NRS ch. 239) – NDOT correspondence with autonomous vehicle operators, labor organizations and the Legislature; agreements and launch records, January 1, 2024 to present

**From** [redacted]
**Date** Wed 9/16/2026 10:27 AM
**To** Public Records Requests <PublicRecordsReq@dot.nv.gov>

**This Message Is From an Untrusted Sender**
You have not previously corresponded with this sender.

Report Suspicious

Dear Records Official:

Thank you for your time and help with this records request.

Under the Nevada Public Records Act, NRS ch. 239, I request the following records from January 1, 2024 through the date of your search:

(1) All correspondence (including email), meeting requests, meeting notes, calendar entries, agendas and presentations between department executive staff or program staff and Waymo LLC, Tesla, Inc., Zoox, Inc., May Mobility, Inc., Motional AD Inc., Avride Inc., Nuro, Inc., Cruise LLC, Aurora Innovation, Inc., Kodiak Robotics, Inc., the Autonomous Vehicle Industry Association, or their representatives, lobbyists or counsel, concerning autonomous, automated or driverless vehicles.

(2) All correspondence, meeting notes and presentations between department staff and labor organizations or advocacy groups concerning autonomous vehicles.

(3) All department bill analyses, fiscal notes, testimony, comments and correspondence with the Legislature or the Governor's office concerning autonomous vehicle legislation or executive orders.

(4) All records concerning the planning, announcement or promotion of any autonomous vehicle launch, expansion or pilot in the state in which the department participated, including press releases and their drafts and event briefing materials.

(5) All agreements, memoranda of understanding, permits or right-of-way authorizations between the department and any named entity, and any incident notifications or complaints received by the department concerning autonomous vehicles.

Please provide records in electronic form (NRS 239.010(4)), with any log, spreadsheet or database in its native format (CSV or Excel) and documents as native or searchable PDF.

I am an investigator with Hunterbrook Media, a news organization, and I am requesting these records to gather information of public interest for dissemination to the public. This request is not made for a commercial purpose. Please notify me before incurring any charge under NRS 239.052.

If any record or portion is withheld, please cite the specific statute or other legal authority that makes the record confidential, as NRS 239.0107(1)(d) requires, and release all reasonably segregable non-confidential material. Please acknowledge receipt and respond within five business days as NRS 239.0107(1) requires. If any item is unclear, contact me at [redacted] so that we can narrow it.

Sincerely,

[redacted]

Outlook

# Nevada Department of Transportation: Public Record Request from Website

**From** info@dot.nv.gov <info@dot.nv.gov>
**Date** Mon 12/16/2024 2:57 PM
**To** Public Records Requests <PublicRecordsReq@dot.nv.gov>

**This Message Is From an External Sender**
This message came from outside your organization.

Report Suspicious

A new entry to a form/survey has been submitted.

| | |
|---|---|
| **Form Name:** | Public Records Request |
| **Date & Time:** | 12/16/2024 2:57 PM |
| **Response #:** | 3633 |
| **Submitter ID:** | 29797 |
| **IP address:** | [redacted] |
| **Time to complete:** | 53 min. , 35 sec. |

**Survey Details**

**Page 1**

**1. Contact Information**

| | | | |
|---|---|---|---|
| ***Name:** | [redacted] | ***Street Address:** | [redacted] |
| ***City, State, and Zip Code** | Las Vegas, NV 89147 | ***Phone Number:** | |
| ***Email address:** | [redacted] | **Company (optional)** | Not answered |

**2. Item Info (if additional space is needed please use Detailed Description below)**

| | | | |
|---|---|---|---|
| **Project #** | Not answered | **Parcel #** | Not answered |
| **Contract #** | Not answered | **Agreement #** | Not answered |
| **City/County** | Not answered | **Location** | Not answered |

**3. Please be specific and include/provide as much information as possible. Missing information may delay your request for records.**

Pursuant to the Nevada Public Records Act (NRS Chapter 239) and applicable federal statutes, I hereby request access to and copies of records related to data collection, storage, and access mechanisms utilized within transportation systems, including automated, smart city, and vehicle tracking technologies. This request includes, but is not limited to, the following:

Devices, Software, and Unique Identifiers Collected
A comprehensive list of all devices, hardware, and software currently employed or under evaluation to collect data within transportation systems, including the types of unique identifiers collected, stored, or evaluated. Include:

Vehicle Related Identifiers:
-License Plate Numbers and Recognition Systems
Bluetooth Addresses and Capture Devices
-Wi-Fi MAC Addresses and Capture Devices
Vehicle Identification Numbers (VIN) and Scanners

-Electronic Toll Collection (ETC) Transponder IDs and Readers
On Board Diagnostics (OBD) Device IDs and Readers
-Telematics Device IDs and Systems
Radio Frequency Identification (RFID) Tags and Systems
-LiDAR and Radar Signatures (vehicle detection and identification)
Acoustic Signatures (vehicle specific sound detection)

Personal Identifiers for Devices Humans Carry:

Smartphones and Tablets:
--IMEI (International Mobile Equipment Identity)
IMSI (International Mobile Subscriber Identity)
--MAC Addresses (Wi-Fi and Bluetooth)
Device Serial Numbers
--SIM Card IDs

-Wearable Devices:
Bluetooth MAC Addresses
--Device Serial Numbers (e.g., fitness trackers, smartwatches, AR/VR devices)

-Smart Payment Systems:
NFC (Near Field Communication) Secure Element IDs
--RFID Tag UIDs (e.g., contactless credit/debit cards)

-Personal Electronics:
Laptop and Peripheral Device MAC Addresses
--Device Serial Numbers for laptops, e-readers, and other portable devices
RFID Enabled Badges and Smart Cards:
--RFID Chip UIDs (employee badges, transit cards)

-Other IoT-Connected Devices:
Device Serial Numbers or MAC Addresses for connected earbuds, headsets, etc.

Biometric Collection Systems:
-Facial Recognition Systems and Collected Data
Gait Analysis Systems (analysis and recording of walking patterns)
-Fingerprint Scanners and Collected Data
Iris Scanners and Patterns
-Voice Recognition Systems and Voiceprints

Include manufacturer names and model numbers for all devices, hardware, or systems used to collect, process, or evaluate the above identifiers.

Records detailing any additional unique identifiers collected beyond those explicitly listed here or under consideration for implementation.

Data Storage, Access, and Third-Party Information
A description of how these unique identifiers are stored and secured.
-Records identifying all state, federal, or third-party agencies with access to this data, including the scope and nature of their access.
-A list of software, tools, or platforms used to access, analyze, or process this data.
Access logs, audit trails, or records documenting user activity related to these systems, including timestamps, IT user groups, and permission levels.
Records identifying third party entities, contractors, or vendors with access to any of these systems or unique identifiers, including the scope and duration of their access.
Third Party Transactions: A list of all third parties from whom your agency purchases data or to whom your agency sells or shares collected data, including the scope and purpose of these transactions.

Opt-Out Management
Records identifying the individual(s) or department responsible for managing opt out requests from individuals who do not wish to have their data collected or stored.
Policies, procedures, or documentation outlining the process for individuals to opt out of data collection, including how such requests are tracked and fulfilled.

Records Readily Available

Records related to asset management, IT systems, and access logs are routinely maintained and can be easily generated without substantial effort.

Please Note: This request does not seek any personal identifying information (PII). Any such information may be redacted prior to fulfillment.

Thank you,
**Nevada Department of Transportation**

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**This is an automated message generated by Granicus. Please do not reply directly to this email.**

**From:** Public Records Requests
**To:** AGGeneralCounsel
**Subject:** PRTF Survey – NDOT
**Date:** Tuesday, September 22, 2026 11:06:12 AM
**Attachments:** Outlook-cid1_image.png
PRR Technology Overly Broad Example_Redacted.pdf
PRR Subject Matter Overly Broad_Redacted.pdf
NDOT Public Records Fee Schedule.pdf

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Good Morning,

Below is NDOT's response to the supplemental questions related to the Public Records Task Force Survey.

1. Up to three (3) examples of public records requests your entity considered overbroad or unduly burdensome:
    a. Attachement PRR Technology Overly Broad Example_Redacted is an example of an overly broad request that specifically is requesting very technical and at times confidential information that had the potential to expose our technology infrastructure. In addition, the public records team would receive communication from the requester such as:
        i. *"This is electronically stored by asset management. How can it take month to show assets? I think the days of hiding the spy tactics have passed. We shouldn't have to prove we know what you have for you to say OK and give us records. Still not as bad as RTC losing a bus in Ireland and using Hart & Holand to cover it up. But not good David. Hart & Holand can't mark things attorney client privilege for funzies. We deserve to know the truth."*
    b. Attachement PRR Subject Matter Overly Broad_Redacted is an example in which we can provide records related to the request. The records search resulted in 189,000 search results which requires years for a member of the NDOT public records team to review based on available work hours and balanced against current PRR workload (currently, NDOT has 125 PRRs open and being processed, so far this year NDOT has received 1143 PRRs).
    c. Finally, we received a request from an individual who requested the entire contents of a single employee's email over the course of a 1-year period which resulted in over 33,000 search results. She refused to narrow her parameters when asked. In addition, she had another request that appeared to be a duplicate of this request. She also refused to close this request in lieu of fulfilling her already open request. I have not included communication with the requester in this response as she is party to litigation with NDOT.
2. Attached is the NDOT fee schedule. Currently, NDOT does not charge any of the

fees reflected in the fee schedule.

If there is any addition information or documentation the task force would like to review, please me know and I am happy to provide what I can.

Thanks so much,

**Heather Hahn, CRM**
**Records Manager**
Nevada Department of Transportation
o 775-888-7978
e heather.hahn@dot.nv.gov | w dot.nv.gov

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**From:** Shirley Tanaka
**To:** EMRB; FID Master; NHD Info; MCS Mailbox; Mines Safety and Training; WCS Helpdesk; Contact Email; MLD Info; nta; NRED Record Requests; TA Administration; [redacted]; Paula L. Hlade; [redacted]; Nv St Board of Architecture; Athletic Trainers; info@barber.nv.gov; [redacted]; chirobd@chirobd.nv.gov; publicrecordsrequest@nscb.state.nv.us; info@nvcosmo.com; Board of Dental Examiners; info@nvopticians.org; Loretta Ponton; nvfuneralboard@fb.nv.gov; support@nvbhme.org; NVLABoard@outlook.com; [redacted] Nevada Board of Massage Therapists; Nevada State Board of Medical Examiners; Nursing Board; board@nvot.org; admin@nvoptometry.org; [redacted] Board Coordination; NVPTB Administration; NV ST Board of Podiatry; Board E-Mail; NBOP Admin; PILB Information; socwork; vetbdinfo@vetboard.nv.gov
**Subject:** Important Nevada Public Records Request
**Date:** Monday, August 17, 2026 11:26:00 AM

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You don't often get email from [redacted] Learn why this is important

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

PUBLIC RECORDS REQUEST

Under the authority of the Nevada public records law, I request public records maintained from November 2023 through the present concerning instances in which the Department of Business and Industry Director's Office became involved in matters that were otherwise being handled by your division, board, commission, bureau, program, or agency.

Specifically, I am requesting records involving Perry Faigin, Dr. Kristopher Sanchez, Marcel Schaerer, Nikki Haag, Amanda Flocchini (Johnson) or other Director's Office employees when they reviewed, commented on, participated in, approved, rejected, modified, delayed, directed, recommended, or otherwise became involved in a matter that was originally being handled within your office.

This request includes, but is not limited to, matters involving:

- Enforcement actions;
- Investigations;
- Licensing decisions;
- Administrative complaints;
- Settlement discussions;
- Penalty recommendations or assessments;
- Audits or examinations;
- Regulatory actions;
- Employee misconduct investigations; (including but not limited to timesheet fraud, sexual misconduct, or substance abuse)
- Ethics complaints;
- Conflicts of interest;
- Retaliation complaints;
- Personnel investigations;
- Workplace safety concerns; and
- Misuse of state resources;

I am interested in understanding the extent to which the Director's Office became involved in decisions that would ordinarily be made by the individual divisions, boards, commissions,

bureaus, programs, or agencies within the Department.

This request is not limited to final decisions. It also includes situations where the Director's Office was consulted before a decision was made, asked to provide input, requested updates, attended meetings concerning a matter, requested additional information, or otherwise participated before the matter was resolved.

Please include records such as emails, Microsoft Teams messages, text messages, memoranda, meeting invitations, calendars, briefing materials, presentations, notes, routing communications, recommendations, draft decision documents, approval requests, status updates, attachments, and similar records reflecting the Director's Office's involvement.

If responsive records are maintained by both your office and the Director's Office, please search both locations for responsive records.

To assist in locating responsive records, searches may include communications referencing Perry Faigin, Kristopher Sanchez, Marcel Schaerer, Nikki Haag, Amanda Flocchini (Johnson), the Director's Office, Director Sanchez, enforcement, settlement, investigation, licensing, penalty, audit, examination, personnel matter, fraud, employee complaint, ethics, retaliation, conflict of interest, management review, or similar terms.

If any records are withheld or redacted, please identify the specific statutory basis for the withholding and produce all reasonably segregable nonconfidential portions as required by the Nevada public records law.

I request production in electronic format.

JOE LOMBARDO
*Governor*

HELEN PARK
*President*

J. DAVID WUEST
*Executive Secretary*

**STATE OF NEVADA**
**BOARD OF PHARMACY**

985 Damonte Ranch Pkwy, Ste 206
Reno, NV 89521

October 1, 2026

**Via Email**
Shirley Tanaka
[redacted]

**Re: August 17, 2026 Public Records Request**

Dear Ms. Tanaka:

The Nevada State Board of Pharmacy (Board) received your public records request dated August 17, 2026, and timely provided an initial response advising that the Board was reviewing the request and identifying potentially responsive records.

The Board continued its review of your request pursuant to the Nevada Public Records Act (NPRA), Chapter 239 of the Nevada Revised Statutes (NRS) and Nevada Administrative Code (NAC), together with the statutes governing the Board.

Your request seeks records maintained from November 2023 through the present concerning instances in which employees of the Department of Business and Industry Directors Office became involved in matters otherwise being handled by the Board. The request identifies Perry Faigin, Dr. Kristopher Sanchez, Marcel Schaerer, Nikki Haag, Amanda Flocchini (Johnson), and "other Director's Office employees," and includes numerous categories of regulatory, investigative, licensing, enforcement, personnel, and administrative matters.

Based on the Board's review, portions of your request potentially include records that are confidential or privileged under Nevada law. Other portions are overly broad or do not sufficiently identify a particular record or reasonably identifiable class of records. Pursuant to NAC 239.867, a Nevada governmental agency is not required to create a public record that does not exist to satisfy a request or otherwise required to conduct research for a requestor.

NAC 239.865 permits the Board to request additional information or clarification to identify the public records being requested. Accordingly, please clarify or narrow the following portions of your request:

**Enforcement and Regulatory Actions**: The terms "regulatory actions" and "enforcement actions" do not sufficiently identify a particular record or reasonably identifiable class of records. To the extent you seek disciplinary records, NRS 639.2485(2) provides that the complaint or other document initiating disciplinary action, and documents and information considered by the Board when determining whether to impose discipline, are public records. Please identify the applicant, licensee, registrant, permit holder, facility, matter, approximate date, or other information sufficient to identify the records sought.

**Investigations:** Pursuant to NRS 639.2485 and NRS 622A.330(2), any materials, records, and reports related to Board investigations are confidential.

**Licensing Decisions:** The Board regulates numerous categories of licenses. The request for involvement in any "licensing decision" from November 2023 through the present does not identify a particular matter or reasonably identifiable class of records. Please identify the applicant, licensee, facility, application, license type, approximate date, or other information sufficient to identify the licensing decision at issue.

**Administrative complaints:** Pursuant to NRS 639.2485(2), the complaint or other document initiating disciplinary action, and documents and information considered by the Board when determining whether to impose discipline, are public records. Please identify the particular complaint, licensee, registrant, applicant, facility, disciplinary proceeding, or other Board matter sought.

**Settlement Discussions:** Settlement agreements approved by the Board are public records pursuant to NRS 622.330(3). Settlement-related records, however, may include attorney-client privileged communications under NRS 49.095, attorney work product, or other protected material. Please identify the parties, approximate date or date range, or other information sufficient to identify the settlement records sought.

**Penalty recommendations or assessments**: To the extent the request seeks records or information obtained or generated during a Board investigation, such records are confidential pursuant to NRS 639.2485(1), unless made public pursuant to NRS 639.2485(2). Disciplinary matters and proposed penalties may also be considered at public Board meetings, recordings of which are public records. Please identify the disciplinary matter, licensee, type of penalty, or relevant time period sought.

**Audits or Examinations:** This category does not sufficiently identify a particular record or reasonably identifiable class of records. To the extent audit, examination, or inspection records constitute records of a Board investigation, NRS 639.2485(1) applies. Please identify the type of audit, examination, or inspection, the licensee or entity involved, and the relevant time period.

**Employee misconduct investigations, including alleged timesheet fraud, sexual misconduct, or substance abuse; ethics complaints; conflicts of interest; retaliation complaints; personnel investigations; workplace safety concerns; and misuse of state resource**s: These categories are overly broad and potentially include substantially different records subject to different confidentiality requirements. Personnel and related records may be

restricted from disclosure depending on the nature of the particular record, including under NAC 284.718, NRS 284.4086, NRS 281A.350, or other applicable law. Please identify the employee, complaint, incident, investigation, or matter and provide an approximate date or narrower time period, to the extent known.

Upon receipt of your clarification, the Board will evaluate the narrowed request, identify potentially responsive records within its legal custody or control, and proceed in accordance with the NPRA.

Sincerely,

/s/ Skylar Young
Assistant General Counsel
Nevada State Board of Pharmacy

**From:** Brett Kandt
**To:** [redacted]
**Cc:** Darlene Nases
**Subject:** Fw: Public Records Request – RAADfest peptide/compounding investigation (July 2025)
**Date:** Thursday, July 31, 2025 11:46:20 AM
**Attachments:** BOP response Pascoe public records request.pdf
Outlook-4tqdn21b

---

Mr. Pascoe-

Please see the attached response to your public records request.

Regards,

**Brett Kandt**
**General Counsel**
**Nevada State Board of Pharmacy**



NOTICE: This information is provided as a courtesy on behalf of the Nevada State Board of Pharmacy. This information does not constitute legal advice and does not establish an attorney-client relationship. This information does not override the specific provisions of Nevada law as applied to a particular set of facts.

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**From:** Dave Pascoe [redacted]
**Sent:** Thursday, July 31, 2025 9:46 AM
**To:** Board Coordination <teambc@pharmacy.nv.gov>
**Subject:** Public Records Request – RAADfest peptide/compounding investigation (July 2025)

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Attn: Public Records Officer, Darlene Nases

Dear Public Records Officer,

Pursuant to NRS 239, I request records related to the RAADfest peptide injection incidents reported in Las Vegas on July 13, 2025 (Red Rock Casino).

Date range: July 1–Aug 31, 2025.

Records requested:

1. Complaints, investigations, inspection reports, notices of correction/violation, enforcement actions, or advisory memos regarding on-site injections/dispensing at RAADfest (including any temporary/remote clinic or booth) in Clark County.

2. Licensure/authorization records (including special event permissions) for any practitioner or entity providing peptide injections or handling prescription drugs at RAADfest, including any Nevada-licensed practitioner contracted by Dr. Kent Holtorf/Holtorf Medical Group.

3. Communications (emails/letters/memos) with LVMPD and SNHD concerning the RAADfest incidents.

4. Communications/records naming suppliers/manufacturers/compounders of peptides associated with RAADfest (including any reference to "Forgotten Formula"), and any product testing, detentions, or recalls.

Production: Electronic delivery preferred. If withholding any portion, please produce all segregable material and cite the exact NRS for each redaction/withholding. I am fine with staggered/rolling releases as records are located.

Fees: Provide a cost estimate before processing if > $50.

Requester: Dave Pascoe
Email: [redacted]
Phone: [redacted]
Address: [redacted]

Thank you.

**From:** Brett Kandt
**To:** [redacted]
**Cc:** Board Coordination; Darlene Nases
**Subject:** Fw: Public records request for pharmacy disciplinary actions
**Date:** Monday, August 3, 2026 8:57:44 AM
**Attachments:** NV_Board_of_Pharmacy_Disciplinary_Request_Signed_2026-07-31.pdf
BOP response Reckton public records request.pdf
Outlook-e1z0giui

---

Attached please find a response to your request.

**Brett Kandt**
**General Counsel**
**Nevada State Board of Pharmacy**

NOTICE: This information is provided as a courtesy on behalf of the Nevada State Board of Pharmacy. This information does not constitute legal advice and does not establish an attorney-client relationship. This information does not override the specific provisions of Nevada law as applied to a particular set of facts.

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**From:** Kingsong Chen [redacted]
**Sent:** Sunday, August 2, 2026 1:21 PM
**To:** Board Coordination <teambc@pharmacy.nv.gov>
**Subject:** Public records request for pharmacy disciplinary actions

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello,

Attached is Reckton's completed request for the existing electronic table of final public disciplinary and enforcement actions covering current and former Board credential classes.

Please provide a written estimate and wait for my approval before incurring any charge.

Thank you,

Kingsong Chen
Reckton

[redacted]

**From:** Lilly Ava Tochner
**To:** Kathy Floyd
**Subject:** Re: Public Records Request
**Date:** Wednesday, November 5, 2025 12:47:50 PM

---

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hi Kathy,

Thank you so much for letting me know! I look forward to hearing from you soon.

Best,
Lilly

On Mon, Nov 3, 2025 at 2:45 PM Kathy Floyd <kfloyd@post.state.nv.us> wrote:

> Good Afternoon!
>
> Pursuant to NRS239.0107 I am making you aware POST is unable to provide these items per this request within 5 days as we are consulting with our legal advisor to determine what records we are able to provide. We anticipate giving you a further response within 2 weeks.
>
> Thank you,
>
> *Kathy Floyd*
>
> Chief, Standards Division
>
> Nevada Commission on POST
>
> post.nv.gov
>
> (775) 687-3335
>
> ---
>
> **From:** Lilly Ava Tochner [redacted]
> **Sent:** Saturday, November 1, 2025 9:25 PM
> **To:** Michael D. Sherlock <msherlock@post.state.nv.us>; Rene Caldara <rcaldara@post.state.nv.us>

**Subject:** Public Records Request

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To whom it may concern,

I hope this email finds you well. My name is Lilly Tochner, and I am a Research Assistant at UC Berkeley. I'm writing to make a public records request. Specifically, I'm requesting individual employment records for all police departments in Nevada, including local (municipal + county) and state police departments, for the period between January 1, 1980 and January 1, 2025, or the closest possible period.

I'm interested in all available data years containing the employment records of individual police officers

1. Full name

2. Employee badge number

3. Date of employment

4. Police department

5. Primary unit assignment

6. Tenure, education

7. Rank

8. Race

9. Gender

10. Type of contract [part-time "reserve" police officer or full-time]

11. Salary

12. Veteran status

13. Date or year of birth

14. Exam score in entry exams such as civil service service exam, if applicable.

15. Date of separation, if applicable).

If applicable, please include a separate entry in case an officer receives a salary for different positions in a given year.

I request that the information I seek be provided in electronic format via email, sent to [redacted]

Hopefully, the data will, therefore, be able to produce estimates of the number of separations (via retirement, layoffs, and resignations) and hires for each year. This request is for academic research on the police labor market.

Thanks in advance,

Lilly Tochner

--

[redacted]

University of California, Berkeley

Research Assistant | B.A. Political Science

[redacted]

**From:** [redacted]
**To:** Michael D. Sherlock
**Subject:** Nevada Public Records Act Request: Nevada police certification data request
**Date:** Monday, July 24, 2023 7:31:12 AM

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Nevada Commission On Peace Officer Standards And Training
Nevada Public Records Act Office
5587 Wa Pai Shone Avenue
Carson City, NV 89701

July 24, 2023

To Whom It May Concern:

This is a public records request made via MuckRock under the Nevada Open Records Act § 239 et seq., seeking records related to law enforcement officer certification in this state.

I are seeking data regarding all law enforcement officers who are actively certified as of the date of this request (or when the request is processed). If your system maintains historical records of previously certified officers who are no longer active, please include them as far back as possible. If correctional officers are certified by your agency, please include them as well.

Please provide as many of the following data points as are maintained for every certified or formerly certified officer:
* Officer unique ID number
* POST or state certification ID number
* Officer's full name
* Officer's date of birth or, if not releasable, year of birth or current age
* Officer's city and/or zip code of residence
* Officer's last/current department or agency
* Officer's last/current department or agency start date
* Officer's last/current position and/or rank at that department or agency
* Officer's previous departments/agencies (employment history), with start and end dates
* Officer's positions and/or ranks at previous departments or agencies
* Officer's original date of certification
* Current status of certification (active, lapsed, expired, suspended, etc.)
* Last action taken on certification
* Date of last action on certification
* Disciplinary actions taken against this officer's certification
* Dates of disciplinary actions taken against this officer's certification
* Decertification action taken (revocation, suspension, voluntary surrender, etc.), if applicable
* Date decertification action taken, if applicable
* POST case number, if applicable, if applicable
* Reason for decertification or similar action, if applicable
* Training history/additional certifications of this officer, if available

If your certification system contains data elements not listed above, please include them in the response, provided they are releasable under the law.

The Invisible Institute is an award-winning nonprofit journalistic production company based in Chicago's Woodlawn neighborhood. Our mission is to enhance the capacity of citizens to hold public institutions accountable.

Because I, the requestor, am a journalist, and because the information regards the safety, welfare, and legal rights of the general public, I request a fee waiver for this data. It is not for commercial benefit because I am a member of the nonprofit news media whose principal purpose is to access and disseminate information regarding the general public's safety, welfare, and legal rights. To the extent you intend to assess any charges, please notify me to discuss first.

Thank you for your time and prompt attention to this matter. Please contact me should you have any questions related to this request.

Sam Stecklow
Journalist
Invisible Institute

View request history, upload responsive documents, and report problems here:
https://accounts.muckrock.com/accounts/login/?next=https%3A%2F%2Fwww.muckrock.com%2Faccounts%2Flogin%2F%3Fnext%3D%252Faccounts%252Fagency_login%252Fnevada-commission-on-peace-officer-standards-and-training-33967%252Fnevada-police-certification-data-request-149811%252F%253Femail%253Dmsherlock%252540post.state.nv.us&url_auth_token=AAGL2L83vGDoAoTHa2_Z_JhnPL8%3A1qNwaQ%3Ayopeins2L0hZxgv4czkX5c3L2AzJqT4fRe93CEQuuGg

If prompted for a passcode, please enter:
MHEEJHYU

Filed via MuckRock.com
E-mail (Preferred): 149811-27254481@requests.muckrock.com

PLEASE NOTE OUR NEW ADDRESS
For mailed responses, please address (see note):
MuckRock News
[redacted]

PLEASE NOTE: This request is not filed by a MuckRock staff member, but is being sent through MuckRock by the above in order to better track, share, and manage public records requests. Also note that improperly addressed (i.e., with the requester's name rather than "MuckRock News" and the department number) requests might be returned as undeliverable.

**From:** Kathy Floyd
**To:** Teresa Varney
**Cc:** Michael D. Sherlock
**Subject:** Re: FOIA request
**Date:** Tuesday, August 4, 2026 7:07:57 AM

---

Good Morning,

I am in receipt of your request and will provide a response within 5 business days.

Thank you,

Kathy Floyd
Chief, Standards Division

---

**From:** Teresa Varney [redacted]
**Sent:** Thursday, July 30, 2026 1:51 PM
**To:** Kathy Floyd <kfloyd@post.state.nv.us>
**Subject:** FOIA request

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Kathy Floyd Nevada POST
Subject: Research Project-Esmeralda County Sheriff's Office/Nye County Sheriff's Office
Under the Nevada Public Records Act I am writing to formally request access to and copies of public records maintained by your agency Nevada POST.
Description of Requested Records:

Please provide copies of the following records:

The full reports, emails, from Nevada POST, Nevada Attorney General, Nevada Division of investigations,the Esmeralda County Sheriff Office or Nye County Sheriff's, office between years 2022, 2023, 2024, 2025 and 2026 , any and all forms and emails of investigations into any and all Nevada Peace Officers found or suspected to have domestic violence convictions or any other conditions under NRS289 or NAC289 making them ineligible for certification, including names and reasons why.

I am looking for all information about what actions Nevada POST took in regards to the April 2026 POST audit that stated there was a sworn Esmeralda County employee working with a domestic violence conviction listed in the background narrative.

Any records and emails that exist of investigations or investigation forms that exist submitted to or from Nevada POST by or to any agency or other person for former Deputy Michael

Tulipat of the Esmeralda County Sheriff's Office as required under NRS 289.585 when a peace officer is under investigation and resign or terminated from employment.

Complete employment records including dates of service and all agencies employed by and all forms and emails submitted to or from anyone to or from Nevada POST for former Deputy Michael Tulipat formerly of the Nye County and Esmeralda County Sheriff and any other agencies worked for if any others exist.

Any other records that contain the name or words "Michael Tulipat" or "Deputy Tulipat" and the words "Domestic Violence" or "Domestic Battery"

Any records forms that contain the words "Esmeralda County Sheriff Domestic Violence "

Separately

All Peace Officer records forms and emails for former Peace Officer Ryan Schmall including total service time as a peace officer and his training records and anything else with the words "Ryan Schmall". Or "Deputy Schmall"

I request that these records be provided in an electronic format (such as PDF attachments via email or a secure download link).
Pursuant to NRS 239.052, any fees charged may not exceed the actual cost of reproducing the record. If your agency charges for electronic distribution or if duplication costs, please notify me of the estimated costs in writing before fulfilling this request.
I also request a waiver of all fees, as the disclosure of this information is in the public interest and accountability.
As required by NRS 239.0107, your office must respond to this request within five business days of receipt. Your response must either provide the records, provide a written estimate of the time needed to comply, or provide a written explanation citing the specific statutory exception authorizing the withholding of the records.
If any portion of this request is deemed exempt or confidential, please redact that specific portion and produce the remainder of the records as required by law.
This important matter is in the interest of public accountability and transparency.
Thank you for your time and assistance.
Please reply your response to this email address
Sincerely,
Teresa Varney
[redacted]

| | |
|---|---|
| **From:** | Cyndi Shein |
| **To:** | AGGeneralCounsel |
| **Cc:** | Mike Strom |
| **Subject:** | Public Records Request - State Archives - Example of burdensome request |
| **Date:** | Wednesday, October 7, 2026 4:50:19 PM |

Good afternoon,

Thank you for the opportunity to provide information to the Public Records Task Force.

**Example of unduly burdensome public records request:**

The State Archives has been working on a public records request for 6 months. Using the search terms specified in the request, the State Archives downloaded relevant Governor's Office emails (from a previous administration) and converted them to PDF. Archives staff identified 1,565 files (474 MB) that meet the search criteria. Archives staff redacted personally identifiable information. Before the response can be sent to the requestor, the Attorney General's Office must review the records, and the Governor's Office Legal Counsel will be given the opportunity to review them for records protected by executive privilege.

The State Archives' fee schedule does not include digital deliverables or compensation for staff time spent on the search.

**Fees**
The State Archives has been uncertain about collecting fees for digital deliverables or the staff time dedicated to fulfilling public records requests. Staff feel empowered to collect fees for paper copies of records or for the media (USB drive) used to deliver digital copies. The fee schedule is here: https://nsla.nv.gov/archives/reproduction-fees

The State Library, Archives, and Public Records responded to your survey based strictly on the number of formal public records requests we received during the specified years. The nature of our role in state government requires staff to respond in a timely manner to all requests for information, whether the request is designated as a formal public records request or not. For example, in FY2026 staff received nearly 1,000 requests for records, but only 27 of the requests were designated by the requestors as "public records requests."

Please let us know if we can provide any additional information to assist the Task Force.

Sincerely,

*Cyndi Shein*

State Archivist and Deputy Administrator, Archives and Records
Nevada State Library, Archives and Public Records
Department of Administration
(775) 684-3306 · cshein@admin.nv.gov
https://nsla.nv.gov/home

Chair, State Historical Records Advisory Board
https://nsla.nv.gov/state-historical-records-advisory-board

**From:** Lawson, Jacqueline
**To:** AGGeneralCounsel
**Cc:** Dixon, Erin P.
**Subject:** Survey of Government Entities re: Public Records
**Date:** Thursday, October 1, 2026 12:29:25 PM
**Attachments:** image001.png
image002.png
image004.png
image005.png
image006.png
image007.png
image003.png
nnph-public-records-request-fees.pdf

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**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good afternoon,

Here are some examples of recent requests we have had difficulties with. The problems stemmed from releasing HIPAA protected and/or PHI information.

- One of our clients got Salmonella Poisoning, and i wanted to see where i can request the Health Department Report, she made.
- Pursuant to the Nevada Public Records Act, I am requesting the **Final Outbreak Investigation Summary Report**, **Epidemiological Case Tracking Summaries (anonymized)**, and **joint agency correspondence logs with the Nevada Department of Agriculture** regarding the Northern Nevada Public Health investigation launched in May 2026 concerning the **Cryptosporidiosis outbreak cluster associated with the animal yoga event on April 12, 2026, at Ferrari Farms**.

Most requests NNPH receives are straightforward and easy to respond to.

Attached is a copy of the current NNPH fee policy, which differs slightly from the Washoe County policy.

Thank you,
Jackie

**Jacqueline Lawson**
*Administrative Assistant I*
*Office of the District Health Officer*

**From:** Christian Salmon
**To:** Susan Broili-Kamesch
**Subject:** Re: NPRA Request: NSCB Records for Listed Contractors, Individuals, and Complaint Matters
**Date:** Wednesday, July 29, 2026 7:55:05 AM
**Attachments:** image004.png
image005.png
image006.png
image002.png

---

Dear Ms. Broili-Kamesch,

Thank you for providing the final page count and invoice.

I am prepared to remit the $19.10 payment so that production of the records is not delayed. Please advise whether payment may be made remotely by credit card or another electronic method, and how. If not, please confirm that payment may be made at the Las Vegas office and that the records will be released electronically promptly after payment is received.

For clarification and to complete the record regarding this request, please also confirm:

- Whether the 432-page total excludes public-meeting minutes and audio recordings available without charge;
- Whether responsive records already available online were excluded and direct links will be provided;
- Whether exact duplicates and previously produced records were excluded as requested;
- Whether the $0.05-per-page charge for electronic production includes employee time or represents another type of cost;
- Whether NSCB has a written fee-waiver policy and, if so, please provide it;
- Whether NSCB has written policies or procedures governing public-records requests, fees, electronic production, fee waivers, or fee calculations and, if so, please provide them; and
- Whether the records will remain available for release by July 31, 2026, once payment is received.

I am proceeding with payment to avoid delaying access to the records while preserving these outstanding requests for clarification.

Thank you.

Respectfully,

Christian Salmon
[redacted]

On Tuesday, July 21, 2026 at 10:52:43 AM PDT, Susan Broili-Kamesch <sbroili-kamesch@nscb.state.nv.us> wrote:

Mr. Salmon:

The total number of public documents compiled per your below request is 432. After subtracting fifty (50) pages, the total page count is 382. The charge is $.05 per page, therefore the cost to compile these records is $19.10.

Attached is an invoice related to your request.

Once payment is received, the records will be released.

Payment will be accepted at either office of the Nevada State Contractors Board by cash (exact change only), check or credit card.

Thank you.

**Susan Broili Kamesch**
***Licensing Administrator***
Nevada State Contractors Board
5390 Kietzke Lane, Ste. 102
Reno, Nevada 89511
Email: sbroili-kamesch@nscb.state.nv.us

"Model Regulatory Board"

Please visit our website at https://www.nscb.nv.gov

**We, at the Nevada State Contractors Board, value your time and opinion. Please complete our short survey and let us know how well we served you today: https://www.research.net/s/NSCBCustomerSurvey. Thank you!**

Please consider the environment before printing this e-mail.

CONFIDENTIALITY NOTICE: This email may contain confidential and privileged material for the sole use of the intended recipient(s). Any review, use, distribution or disclosure by others is strictly prohibited. If you have received this communication in error, please notify the sender immediately by email and delete the message and any file attachments from your computer. Thank you.

**From:** Christian Salmon [redacted]
**Sent:** Thursday, July 16, 2026 3:56 PM
**To:** Susan Broili-Kamesch <SBroili-Kamesch@nscb.state.nv.us>
**Subject:** Re: NPRA Request: NSCB Records for Listed Contractors, Individuals, and Complaint Matters

====
CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or on clicking links from unknown senders.
====

Dear Ms. Broili-Kamesch,

Thank you for your response. I am willing to clarify the scope of my request to avoid unrelated historical material and unnecessary duplication while preserving the records relevant to the listed complaint matters and entities.

**Date range and clarified scope**

1. **Records relating to my complaints and cases**

   Please use January 1, 2019 through the date the request is fulfilled for all records relating to my complaints, property, complaint numbers, and the listed contractors, persons, and entities.

   Please also include older records if they are contained in, attached to, referenced by, relied upon in, or maintained as part of a responsive complaint, investigation, enforcement, disciplinary, licensing, or closure file.

2. **Other complaints involving the listed contractors, persons, and entities**

   For complaints not filed by me, please limit the search to January 1, 2019 through the date the request is fulfilled and produce existing public records showing, where available:

   - The complaint or case number;
   - The date received and date closed;
   - The general complaint category;
   - The disposition or outcome;
   - Whether the matter resulted in a Notice to Correct, citation, disciplinary action, license action, fine, probation, suspension, revocation, criminal referral, recovery-fund matter, bond claim, hearing, settlement, or other enforcement action; and
   - Any public citation, disciplinary complaint, final order, settlement, or other public final-action document.

   Older records need only be included if they were incorporated into, referenced by, or relied upon in a post-2019 complaint, citation, disciplinary matter, enforcement action, or license action.

3. **Records that may be excluded to reduce unnecessary pages**

   To avoid unnecessary duplication, you may exclude:

   - Exact duplicates of documents I submitted, unless NSCB's copy contains stamps, annotations, handwritten notes, routing information, metadata, internal markings, or other material differences;
   - Duplicate copies of the same email or attachment;
   - Blank forms, generic brochures, and general informational materials;
   - Routine license-renewal, bond-renewal, and insurance-renewal records that are unrelated to the relevant work period, complaint decision, disciplinary action, enforcement action, bond claim, or license status at issue; and
   - General license information that is already available online, provided the applicable direct link is supplied.

This clarification is intended to eliminate unrelated and duplicative material. It does not narrow the requested records concerning my own complaints, cases, property, communications, or the actions taken by NSCB in those matters.

**Fee and production clarification**

Before I authorize or agree to any charge, please provide the following information:

- The final or reasonably estimated page count, separated by contractor, person, case, or record category;
- An itemized estimate showing how the proposed charge is calculated;
- An explanation of how the $0.05-per-page charge applies to records that will be transmitted electronically;
- Whether that charge includes employee time for searching, reviewing, redacting, organizing, scanning, converting, or transmitting records and, if so, how those costs are included in the per-page amount;
- Confirmation that the first 50 qualifying pages will be provided without charge under NSCB's published fee schedule;
- Identification and separation of any meeting minutes and audio recordings that will be provided without charge;
- Identification and links for responsive records already publicly available online;
- Identification of any documents previously produced that have been excluded as duplicates;
- The number of pages remaining after the no-charge records, online records, and excluded duplicates are removed; and
- A copy of NSCB's current written fee-waiver policy and criteria, together with the reason my waiver request was denied under that policy. If NSCB does not have a written fee-waiver policy, please confirm that.
- NSCB's current written policies and procedures governing public-records requests, fees, electronic production, fee waivers, and fee calculations.

Please also advise whether I may inspect any remaining chargeable records without charge before deciding which records I need copied or transmitted.

**Rolling and no-charge production**

Please proceed with rolling production of:

- Records available online through direct links;
- Meeting minutes and audio recordings available without charge;
- The first 50 qualifying pages available without charge; and
- Any other responsive records for which NSCB determines no charge applies.

For the first 50 pages, please provide complete records rather than splitting documents, using the following order of priority:

1. B & F Electric, LLC dba B & F Construction—closure, administrative-citation, Notice-to-Correct decision, compliance, and contractor-only communication records;
2. New Gen Electric, LLC / Carlos Bracho—closing, disposition, and communication records;
3. Vegas Sprinkler Specialists, LLC dba U.S. Sprinklers—closure, reopening, and later unlicensed-activity records;
4. Ultimate Service Plumbing LLC / Luis Delgado—closure, action-taken, Notice-to-Correct, and unanswered-communication records;
5. Lisa Bozek / Design Therapy Consulting LLC records; and
6. Jose Andres Lopez / GC Construction / JJ&D Investments, LLC referral and closure records.

I understand that July 31, 2026 is NSCB's estimated completion date. Please continue with the search and rolling production while the fee questions above are being clarified.

Please confirm receipt of this clarification and advise whether it changes the estimated page count or production date.

Respectfully,

Christian Salmon
[redacted]

On Wednesday, July 15, 2026 at 09:20:47 AM PDT, Susan Broili-Kamesch <sbroili-kamesch@nscb.state.nv.us> wrote:

> Good morning.

In preparing records in connection with this request, some of these records go back 15 years, which you may not find helpful.

To help narrow down the search, as well as reduce the number of pages, please provide a date range in relation to your request.

Also, we do not yet have a final page count, but, if the request moves forward as requested below, we expect the page count to be over 500 pages and possibly close to 1,000 pages. Your request for waiver of fees cannot be granted. The NSCB will charge $.05 per page and the documents will be transmitted electronically.

Also, given the very large scope of this request, you are hereby advised that these documents will be provided to you no later than July 31, 2026.

Please advise if you would like to narrow the scope of your request.

Thank you.

**Susan Broili Kamesch**
***Licensing Administrator***
Nevada State Contractors Board
5390 Kietzke Lane, Ste. 102
Reno, Nevada 89511
Email: sbroili-kamesch@nscb.state.nv.us

"Model Regulatory Board"

Please visit our website at https://www.nscb.nv.gov

**We, at the Nevada State Contractors Board, value your time and opinion. Please complete our short survey and let us know how well we served you today: https://www.research.net/s/NSCBCustomerSurvey. Thank you!**

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**From:** Christian Salmon [redacted]
**Sent:** Thursday, July 9, 2026 3:57 PM
**To:** Susan Broili-Kamesch <SBroili-Kamesch@nscb.state.nv.us>
**Subject:** Re: NPRA Request: NSCB Records for Listed Contractors, Individuals, and Complaint Matters

====
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====

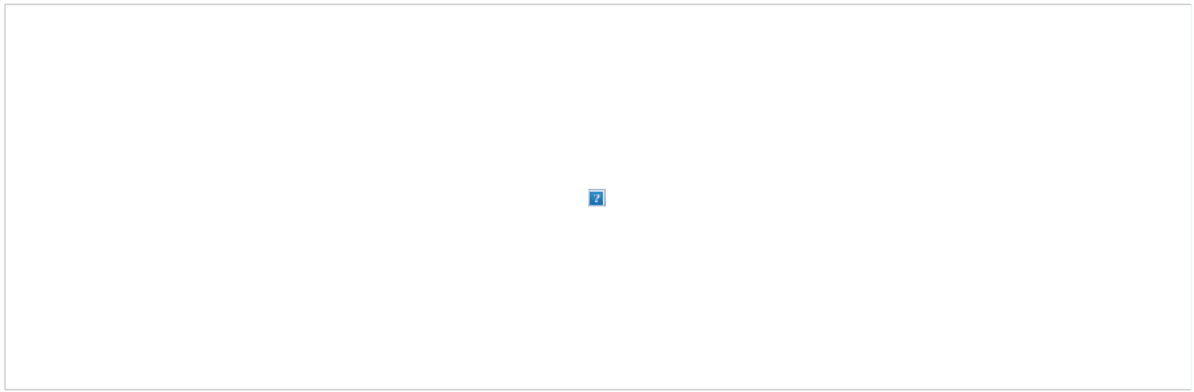
Hi Susan Broili-Kamesch,

Both NPRAs should be the same, soI'm not sure where the discrepancy is coming from. Nonetheless, so we can proceed, please retract the 9 page NPRA, and move forward with the page NPRA. Thank you,

Christian Salmon
**On Thursday, July 9, 2026 at 03:02:57 PM PDT, Susan Broili-Kamesch <sbroili-kamesch@nscb.state.nv.us> wrote:**

Mr. Salmon.

You will notice my email indicated "future" request should be sent to the dedicated email address, see below screenshot:



Please advise if you wish to retract or cancel the initial request received early this morning? The first request contains 9 pages and the second request contains 17 pages.

Thank you.

**Susan Broili Kamesch**
***Licensing Administrator***
Nevada State Contractors Board
5390 Kietzke Lane, Ste. 102
Reno, Nevada 89511
Email: sbroili-kamesch@nscb.state.nv.us



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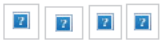
Please visit our website at https://www.nscb.nv.gov



**We, at the Nevada State Contractors Board, value your time and opinion. Please complete our short survey and let us know how well we served you today: https://www.research.net/s/NSCBCustomerSurvey. Thank you!**



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---

**From:** Christian Salmon [redacted]
**Sent:** Thursday, July 9, 2026 2:54 PM
**To:** Susan Broili-Kamesch <SBroili-Kamesch@nscb.state.nv.us>
**Subject:** Re: NPRA Request: NSCB Records for Listed Contractors, Individuals, and Complaint Matters

====
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====

Hi Susan Broili-Kamesch,

Thank you for your reply. I thought you had asked me to redirect / resubmit my NPRA Request to the *publicrecordsrequest@nscb.state.nv.us* email address. Pardon me for misunderstanding. Both submissions sent to sbroili-*kamesch@nscb.state.nv.us*, and *publicrecordsrequest@nscb.state.nv.us*, are identical.

How would you prefer to proceed? Thank you.

Best regards,
Christian Salmon

On Thursday, July 9, 2026 at 02:40:13 PM PDT, Susan Broili-Kamesch <sbroili-kamesch@nscb.state.nv.us> wrote:

Mr. Salmon.

Does this request supersede the request received earlier today or are you expecting separate responses to both requests?

**Susan Broili Kamesch**
***Licensing Administrator***
Nevada State Contractors Board
5390 Kietzke Lane, Ste. 102
Reno, Nevada 89511
Email: sbroili-kamesch@nscb.state.nv.us



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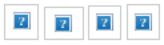
Please visit our website at https://www.nscb.nv.gov



**We, at the Nevada State Contractors Board, value your time and opinion. Please complete our short survey and let us know how well we served you today: https://www.research.net/s/NSCBCustomerSurvey. Thank you!**



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**From:** Christian Salmon [redacted]
**Sent:** Thursday, July 9, 2026 2:29 PM
**To:** Public Records Request <PublicRecordsRequest@nscb.state.nv.us>
**Subject:** NPRA Request: NSCB Records for Listed Contractors, Individuals, and Complaint Matters

====
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====

Dear Nevada State Contractors Board - Public Records Department,

Pursuant to the Nevada Public Records Act, NRS Chapter 239, I request the public records described below.

I am requesting all public records in the Nevada State Contractors Board's legal custody or control concerning the matters, contractors, persons, complaint numbers, license numbers, and subjects listed below. The categories of records listed are intended as examples and specific directions for searching, and are not intended to limit this request. I am requesting any and all responsive records, whether or not specifically named below.

Please search records from January 1, 2019 through the date this request is fulfilled, including older records if they are contained in, attached to, referenced by, relied upon in, or maintained as part of any responsive complaint, licensing, disciplinary, enforcement, public-records, or meeting file.

Please search all NSCB-controlled locations where responsive records may exist, including but not limited to complaint files, licensing files, investigation files, public-records request files, disciplinary files, administrative-citation files, meeting/hearing files, paper files, scanned files, email accounts, attachments, shared drives, case-management systems, licensing databases, and any other NSCB repository.

This request includes records memorializing, summarizing, reflecting, referring to, or arising from oral communications, phone calls, voicemail messages, meetings, conferences, internal discussions, supervisory discussions, investigator discussions, or oral decisions, including but not limited to call logs, contact logs, investigator notes, case notes, handwritten notes, calendar entries, meeting notes, voicemail recordings, voicemail transcripts, internal summaries, task notes, and case-management entries.

For each listed contractor, licensee, person, business, DBA, owner, qualifier, managing member, responsible managing employee, agent, associate, salesperson, predecessor, successor, or related entity, please include all public complaint-history, disciplinary-history, citation-history, investigation-history, enforcement-history, license-action, bond-claim, recovery-fund, suspension, cancellation, reinstatement, revocation, probation, fine, settlement, hearing, closure, and public disciplinary records, whether or not the complaint was filed by Christian Salmon.

1. B & F Electric, LLC dba B & F Construction

Please produce all public records concerning:

- B & F Electric, LLC dba B & F Construction;
- NSCB Case No. 30066199;
- License No. 0086062;
- Administrative Citation No. C-2510-4892;
- Christian Salmon / 9060 W. Washburn Road, Las Vegas, Nevada 89149;
- Paul Amenta, Evolution Solar, Eduardo De Posada, OutboxTek LLC, Tim Fromhart, Jerome Blitz, and any related person or entity referenced in the complaint, investigation, licensing, administrative-citation, bond, disciplinary, or closure records.

This request includes, without limitation:

- The complete complaint file.
- The complete administrative-citation file and packet, including all attachments, exhibits, supporting evidence, proof of service, payment records, compliance records, final-order records, and records showing whether the citation was contested, modified, paid, closed, or made final.
- Any Notice to Correct, proposed Notice to Correct, draft Notice to Correct, internal discussion regarding whether to issue a Notice to Correct, decision memorandum, supervisor review, legal review, or record explaining why no Notice to Correct was issued.
- All records concerning corrective action, consumer-impact items, workmanship issues, permitting issues, roof or leak issues, generator issues, solar/battery system issues, Home Management / Load Controller issues, EMP-hardening issues, labeling issues, remaining incomplete work, or alleged incomplete contract scope.
- All correspondence between NSCB and B & F, Tim Fromhart, Jerome Blitz, Paul Amenta, Eduardo De Posada, Evolution Solar, OutboxTek, Paramount, any surety/bond company, any attorney, Clark County, NV Energy, the Attorney General, the Clark County District Attorney, or any other agency concerning this matter.
- All correspondence sent to the contractor or related parties that was not copied to me.
- All internal NSCB communications about this matter, including communications involving investigators, supervisors, leadership, legal counsel, licensing staff, public-information staff, public-records staff, or executive staff.
- All records concerning any public-records request relating to this matter, including search logs, custodian communications, production decisions, withholding decisions, redaction decisions, exemption decisions, and transmittal records.
- All bond, cash-bond, surety, insurance, recovery-fund, license-history, classification, monetary-limit, qualifier, managing-member, responsible-managing-employee, disciplinary, suspension, reinstatement, cancellation, renewal, and complaint-history records for all involved B & F licenses and related entities to the extent disclosable.
- All public complaint-history, disciplinary-history, citation-history, investigation-history, enforcement-history, license-action, bond-claim, recovery-fund, suspension, cancellation, reinstatement, revocation, probation, fine, settlement, hearing, closure, and public disciplinary records involving B & F Electric, LLC dba B & F Construction, its licenses, owners, qualifiers, managing members, agents, associates, salespersons, DBAs, predecessor entities, successor entities, or related entities, whether or not the complaint was filed by Christian Salmon.

2. Vegas Sprinkler Specialists, LLC dba U.S. Sprinklers

Please produce all public records concerning:

- Vegas Sprinkler Specialists, LLC dba U.S. Sprinklers;
- NSCB Case No. 30063207;
- License No. 0084772;
- Christian Salmon / 9060 W. Washburn Road, Las Vegas, Nevada 89149;
- Damien Bilyeu, Terry Wike, Jason Pugh, Charlene Fitzharris, Santiago, and any person or entity referenced in the original complaint, reopening request, or unlicensed-contractor complaint materials.

This request includes, without limitation:

- The complete original complaint file.
- The December 14, 2023 closing-letter file and all records supporting or explaining the statement that the complaint was withdrawn.
- All records concerning any request to reopen, re-file, reconsider, or continue the matter.
- All records concerning any statute-of-limitations, timeliness, four-year complaint-period, reopening, or new-complaint analysis.
- All records concerning the August 2025 unlicensed-activity complaint, including intake review, enforcement review, criminal-referral review, supervisor review, legal review, and any decision not to proceed.
- All records concerning the contractor's license status, cancellation, non-renewal, reinstatement, bond, insurance, disciplinary history, or authority to solicit or perform work.
- All records concerning the invoice provision or practice stating that "Contractors' Board Disputes" would add a $100 fee if the Board did not find negligence.
- All correspondence with the contractor, the complainant, NSCB staff, NSCB leadership, the Attorney General, the Clark County District Attorney, or any other agency concerning this matter.
- All records showing what written notification of action taken on the complaint was provided to the licensee and to me.
- All public complaint-history, disciplinary-history, citation-history, investigation-history, enforcement-history, license-action, bond-claim, recovery-fund, suspension, cancellation, reinstatement, revocation, probation, fine, settlement, hearing, closure, and public disciplinary records involving Vegas Sprinkler Specialists, LLC dba U.S. Sprinklers, its owners,

qualifiers, managing members, agents, associates, salespersons, DBAs, predecessor entities, successor entities, or related entities, whether or not the complaint was filed by Christian Salmon.

3. New Gen Electric, LLC / Carlos Bracho

Please produce all public records concerning:

- New Gen Electric, LLC;
- Carlos Bracho;
- NSCB Case No. 30065100;
- License No. 0091226;
- Christian Salmon / 9060 W. Washburn Road, Las Vegas, Nevada 89149;
- the kitchen-remodel electrical work, complaint, investigation, closure, and any Better Business Bureau-related correspondence or records.

This request includes, without limitation:

- The complete complaint file.
- The March 22, 2024 closing letter and all records showing to whom it was sent.
- All records explaining why the complaint was closed on the basis that the evidence did not support, or was inconclusive regarding, a violation.
- All records showing whether any closing letter, closure notice, disposition notice, action-taken notice, explanation of reasons, appeal information, reconsideration information, or similar record was sent to me.
- All communications between NSCB and New Gen Electric, Carlos Bracho, the Better Business Bureau, Clark County, any inspector, any attorney, or any other agency.
- All internal NSCB communications, supervisor reviews, legal reviews, evidence reviews, investigator notes, disposition notes, and case-management notes concerning this complaint.
- All licensing, bond, insurance, disciplinary, qualifier, monetary-limit, classification, renewal, suspension, reinstatement, and complaint-history records for New Gen Electric, LLC / Carlos Bracho to the extent disclosable.
- All records showing what written notification of action taken on the complaint was provided to the licensee and to me.
- All public complaint-history, disciplinary-history, citation-history, investigation-history, enforcement-history, license-action, bond-claim, recovery-fund, suspension, cancellation, reinstatement, revocation, probation, fine, settlement, hearing, closure, and public disciplinary records involving New Gen Electric, LLC, Carlos Bracho, its owners, qualifiers, managing members, agents, associates, salespersons, DBAs, predecessor entities, successor entities, or related entities, whether or not the complaint was filed by Christian Salmon.

4. Ultimate Service Plumbing LLC / Luis Delgado

Please produce all public records concerning:

- Ultimate Service Plumbing LLC;
- Luis Delgado;
- NSCB Case No. 30063683;
- NSCB Case No. 30068041;
- License No. 0082241;
- Christian Salmon / 9060 W. Washburn Road, Las Vegas, Nevada 89149.

This request includes, without limitation:

- The complete complaint files for Case Nos. 30063683 and 30068041.
- All Notice to Correct records, amended Notice to Correct records, compliance records, permit records, inspection records, proof-of-completion records, closure records, and communications concerning the original repair and later repeated malfunction.
- All records concerning my question to Raymond Zack asking whether the "date of completion" is the date Luis Delgado installed the Stiebel Eltron under-counter unit as a result of my complaint.
- All records showing whether NSCB responded to that question or considered the issue internally.
- All closing letters, closure notices, disposition notices, action-taken notices, reasons for action, final-action records, or similar records sent to Ultimate Service Plumbing LLC, Luis Delgado, or me.
- All internal NSCB communications, supervisor reviews, legal reviews, investigator notes, disposition notes, and case-management notes concerning these matters.
- All licensing, bond, insurance, disciplinary, qualifier, monetary-limit, classification, renewal, suspension, reinstatement, and complaint-history records for Ultimate Service Plumbing LLC / Luis Delgado to the extent disclosable.
- All records showing what written notification of action taken on the complaint was provided to the licensee and to me.
- All public complaint-history, disciplinary-history, citation-history, investigation-history, enforcement-history, license-action, bond-claim, recovery-fund, suspension, cancellation, reinstatement, revocation, probation, fine, settlement, hearing, closure, and public disciplinary records involving Ultimate Service Plumbing LLC, Luis Delgado, its owners, qualifiers, managing members, agents, associates, salespersons, DBAs, predecessor entities, successor entities, or related entities, whether or not the complaint was filed by Christian Salmon.

5. Lisa Bozek / Design Therapy Consulting LLC

Please produce all public records concerning:

- Lisa Bozek;
- Design Therapy Consulting LLC;
- Design Therapy;
- DesignTherapyLB@gmail.com;
- 9729 Peacock Hill Cir, Las Vegas, Nevada 89117;
- 702-461-2913;
- the kitchen-remodel complaint materials submitted by Christian Salmon;
- 9060 W. Washburn Road, Las Vegas, Nevada 89149;
- any allegation, report, investigation, intake review, referral, or decision concerning unlicensed contracting, acting as a contractor without a license, arranging construction work, coordinating licensed or unlicensed subcontractors, or using/arranging contractors while not licensed as a Nevada contractor.

This request includes, without limitation:

- The complete complaint/intake file.
- Any decision not to investigate, not to open a case, not to pursue unlicensed-contracting enforcement, or to refer the matter elsewhere.
- Any correspondence sent to Lisa Bozek, Design Therapy Consulting LLC, Design Therapy, me, any subcontractor, any licensed contractor, or any other agency concerning this matter.
- Any records concerning whether NSCB determined Lisa Bozek, Design Therapy Consulting LLC, or Design Therapy did or did not require a contractor's license for the work at issue.
- Any records concerning criminal referral, civil enforcement, cease-and-desist action, citation, warning, or closure.
- All public complaint-history, disciplinary-history, citation-history, investigation-history, enforcement-history, license-action, bond-claim, recovery-fund, suspension, cancellation,

reinstatement, revocation, probation, fine, settlement, hearing, closure, and public disciplinary records involving Lisa Bozek, Design Therapy Consulting LLC, Design Therapy, any related business name, trade name, DBA, agent, associate, salesperson, predecessor entity, successor entity, or related entity, whether or not the complaint was filed by Christian Salmon.

6. Jose Andres Lopez / GC Construction / JJ&D Investments, LLC

Please produce all public records concerning:

- Jose Andres Lopez;
- GC Construction;
- JJ&D Investments, LLC;
- any related name, business name, trade name, DBA, owner, agent, associate, salesperson, predecessor entity, successor entity, or related entity connected to my complaint and the criminal matter referred for prosecution.

This request includes, without limitation:

- Records documenting NSCB's intake, investigation, referral, cooperation with the Clark County District Attorney, communications with me, disciplinary records, closure records, public disciplinary records, and any records concerning restitution, victim participation, or agency follow-through.
- All public complaint-history, disciplinary-history, citation-history, investigation-history, enforcement-history, license-action, bond-claim, recovery-fund, suspension, cancellation, reinstatement, revocation, probation, fine, settlement, hearing, closure, and public disciplinary records involving Jose Andres Lopez, GC Construction, JJ&D Investments, LLC, any related business name, trade name, DBA, owner, agent, associate, salesperson, predecessor entity, successor entity, or related entity, whether or not the complaint was filed by Christian Salmon.

7. Public meeting, disciplinary hearing, board-meeting, and related public records

Please produce all public records, including agendas, agenda packets, supporting materials, staff reports, briefing memoranda, exhibits, minutes, transcripts, audio recordings, video recordings, disciplinary-hearing records, administrative-law-judge records, public-comment records, and board-meeting supporting materials where any of the following were discussed, considered, noticed, heard, voted upon, approved, closed, disciplined, cited, paid, referred, or otherwise acted upon:

- B & F Electric, LLC dba B & F Construction;
- Administrative Citation No. C-2510-4892;
- Case No. 30066199;
- Vegas Sprinkler Specialists, LLC dba U.S. Sprinklers;
- Case No. 30063207;
- New Gen Electric, LLC / Carlos Bracho;
- Case No. 30065100;
- Ultimate Service Plumbing LLC / Luis Delgado;
- Case Nos. 30063683 and 30068041;
- Lisa Bozek;
- Design Therapy Consulting LLC;
- Design Therapy;
- Jose Andres Lopez;
- GC Construction;
- JJ&D Investments, LLC.

For meeting minutes and audio recordings, I request production at no charge under NRS 241.035.

8. Search terms

Please use at least the following search terms, names, and identifiers:

- Christian Salmon
- TheChristianJSalmon@gmail.com
- ChristianJSalmon@aol.com
- 9060 W. Washburn
- 9060 West Washburn
- Case 30066199
- C-2510-4892
- B & F
- B&F
- B & F Electric
- B & F Construction
- Tim Fromhart
- Timothy Fromhart
- Jerome Blitz
- Paul Amenta
- Evolution Solar
- Eduardo De Posada
- Eduardo Posada
- OutboxTek
- Case 30063207
- Vegas Sprinkler Specialists
- U.S. Sprinklers
- Damien Bilyeu
- Terry Wike
- Jason Pugh
- Case 30065100
- New Gen Electric
- Carlos Bracho
- Case 30063683

Case 30068041

- Ultimate Service Plumbing
- Luis Delgado
- Raymond Zack
- Lisa Bozek
- Design Therapy Consulting LLC
- Design Therapy
- DesignTherapyLB@gmail.com
- Jose Andres Lopez
- GC Construction
- JJ&D Investments

Withholding/Redaction Log

If any responsive record is withheld or redacted, please provide a Withholding/Redaction Log identifying:

- The record withheld or redacted;
- The date of the record;
- The record type;
- The author, sender, recipient, or custodian, if applicable and disclosable;
- Whether the record is withheld in full or redacted in part;
- The specific legal authority relied upon for withholding or redaction;
- Whether the non-confidential portions can be produced with redactions.

Please do not withhold an entire record if redaction of confidential information would allow production of the non-confidential portions.

Format and fees

Please produce the records electronically by email, secure download link, or other electronic method. I request searchable PDFs where available, native/exported email or PDF with complete header information for emails, and native format for spreadsheets or databases where practical.

I request that no fee be charged because no paper copies are requested. If NSCB contends any fee applies, please provide an itemized written estimate and legal basis before incurring or charging any fee, including the specific authority for the fee, the calculation method, and whether the fee is based on actual cost.

I do not authorize paid copying, media charges, or other costs without prior written notice and my written approval.

Rolling production

Please produce records on a rolling basis. If some records are readily available, please produce those records now rather than delaying production until every search is complete.

Five-business-day response

Please provide the written response required by NRS 239.0107 within five business days, including one or more of the following as applicable:

- Production of readily available records;
- Written notice that NSCB does not have legal custody or control of any requested records, including the name and address of the governmental entity that does have custody or control if known;
- Written notice identifying the earliest date and time after which records will be available;
- Written notice of any denial based on confidentiality, including the specific statute or other legal authority making the record, or part of the record, confidential.

Please confirm receipt of this request.

Respectfully,

Christian Salmon
[redacted]

[redacted]

----- Forwarded Message -----
**From:** Christian Salmon[redacted]
**To:** Susan Broili-Kamesch <sbroili-kamesch@nscb.state.nv.us>
**Cc:** Public Records Request <publicrecordsrequest@nscb.state.nv.us>
**Sent:** Thursday, July 9, 2026 at 02:22:46 PM PDT
**Subject:** Re: NPRA Request: NSCB Records for Listed Contractors, Individuals, and Complaint Matters

Ms. Susan Broili-Kamesch,

I will resend the NPRA Request there. Thank you.

Best regards,
Christian Salmon

On Thursday, July 9, 2026 at 10:48:39 AM PDT, Susan Broili-Kamesch <sbroili-kamesch@nscb.state.nv.us> wrote:

Mr. Salmon.

To ensure receipt of future requests, please use the following dedicated email address: publicrecordsrequest@nscb.state.nv.us

The Nevada State Contractors Board will respond as outlined on the attached document. You will be notified if the request cannot be satisfied within five (5) business days.

Thank you.

**Susan Broili Kamesch**
***Licensing Administrator***
Nevada State Contractors Board
5390 Kietzke Lane, Ste. 102
Reno, Nevada 89511

Email: sbroili-kamesch@nscb.state.nv.us

"Model Regulatory Board"

Please visit our website at https://www.nscb.nv.gov

We, at the Nevada State Contractors Board, value your time and opinion. Please complete our short survey and let us know how well we served you today: https://www.research.net/s/NSCBCustomerSurvey. Thank you!

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**From:** Christian Salmon [redacted]
**Sent:** Thursday, July 9, 2026 10:24 AM
**To:** Susan Broili-Kamesch <SBroili-Kamesch@nscb.state.nv.us>
**Subject:** NPRA Request: NSCB Records for Listed Contractors, Individuals, and Complaint Matters

====
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====

Dear Ms. Broili-Kamesch,

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I am requesting all public records in the Nevada State Contractors Board's legal custody or control concerning the matters, contractors, persons, complaint numbers, license numbers, and subjects listed below. The categories of records listed are intended as examples and specific directions for searching, and are not intended to limit this request. I am requesting any and all responsive records, whether or not specifically named below.

Please search records from January 1, 2019 through the date this request is fulfilled, including older records if they are contained in, attached to, referenced by, relied upon in, or maintained as part of any responsive complaint, licensing, disciplinary, enforcement, public-records, or meeting file.

Please search all NSCB-controlled locations where responsive records may exist, including but not limited to complaint files, licensing files, investigation files, public-records request files, disciplinary files, administrative-citation files, meeting/hearing files, paper files, scanned files, email accounts, attachments, shared drives, case-management systems, licensing databases, and any other NSCB repository.

This request includes records memorializing, summarizing, reflecting, referring to, or arising from oral communications, phone calls, voicemail messages, meetings, conferences, internal discussions, supervisory discussions, investigator discussions, or oral decisions, including but not limited to call logs, contact logs, investigator notes, case notes, handwritten notes, calendar entries, meeting notes, voicemail recordings, voicemail transcripts, internal summaries, task notes, and case-management entries.

For each listed contractor, licensee, person, business, DBA, owner, qualifier, managing member, responsible managing employee, agent, associate, salesperson, predecessor, successor, or related entity, please include all public complaint-history, disciplinary-history, citation-history, investigation-history, enforcement-history, license-action, bond-claim, recovery-fund, suspension, cancellation, reinstatement, revocation, probation, fine, settlement, hearing, closure, and public disciplinary records, whether or not the complaint was filed by Christian Salmon.

1. B & F Electric, LLC dba B & F Construction

Please produce all public records concerning:

- B & F Electric, LLC dba B & F Construction;
- NSCB Case No. 30066199;
- License No. 0086062;
- Administrative Citation No. C-2510-4892;
- Christian Salmon / 9060 W. Washburn Road, Las Vegas, Nevada 89149;
- Paul Amenta, Evolution Solar, Eduardo De Posada, OutboxTek LLC, Tim Fromhart, Jerome Blitz, and any related person or entity referenced in the complaint, investigation, licensing, administrative-citation, bond, disciplinary, or closure records.

This request includes, without limitation:

- The complete complaint file.
- The complete administrative-citation file and packet, including all attachments, exhibits, supporting evidence, proof of service, payment records, compliance records, final-order records, and records showing whether the citation was contested, modified, paid, closed, or made final.
- Any Notice to Correct, proposed Notice to Correct, draft Notice to Correct, internal discussion regarding whether to issue a Notice to Correct, decision memorandum, supervisor review, legal review, or record explaining why no Notice to Correct was issued.
- All records concerning corrective action, consumer-impact items, workmanship issues, permitting issues, roof or leak issues, generator issues, solar/battery system issues, Home Management / Load Controller issues, EMP-hardening issues, labeling issues, remaining incomplete work, or alleged incomplete contract scope.
- All correspondence between NSCB and B & F, Tim Fromhart, Jerome Blitz, Paul Amenta, Eduardo De Posada, Evolution Solar, OutboxTek, Paramount, any surety/bond company, any attorney, Clark County, NV Energy, the Attorney General, the Clark County District Attorney, or any other agency concerning this matter.
- All correspondence sent to the contractor or related parties that was not copied to me.
- All internal NSCB communications about this matter, including communications involving investigators, supervisors, leadership, legal counsel, licensing staff, public-information staff, public-records staff, or executive staff.
- All records concerning any public-records request relating to this matter, including search logs, custodian communications, production decisions, withholding decisions, redaction decisions, exemption decisions, and transmittal records.
- All bond, cash-bond, surety, insurance, recovery-fund, license-history, classification, monetary-limit, qualifier, managing-member, responsible-managing-employee, disciplinary, suspension, reinstatement, cancellation, renewal, and complaint-history records for all involved B & F licenses and related entities to the extent disclosable.
- All public complaint-history, disciplinary-history, citation-history, investigation-history, enforcement-history, license-action, bond-claim, recovery-fund, suspension, cancellation, reinstatement, revocation, probation, fine, settlement, hearing, closure, and public disciplinary records involving B & F Electric, LLC dba B & F Construction, its licenses, owners, qualifiers, managing members, agents, associates, salespersons, DBAs,

predecessor entities, successor entities, or related entities, whether or not the complaint was filed by Christian Salmon.

2. Vegas Sprinkler Specialists, LLC dba U.S. Sprinklers

Please produce all public records concerning:

- Vegas Sprinkler Specialists, LLC dba U.S. Sprinklers;
- NSCB Case No. 30063207;
- License No. 0084772;
- Christian Salmon / 9060 W. Washburn Road, Las Vegas, Nevada 89149;
- Damien Bilyeu, Terry Wike, Jason Pugh, Charlene Fitzharris, Santiago, and any person or entity referenced in the original complaint, reopening request, or unlicensed-contractor complaint materials.

This request includes, without limitation:

- The complete original complaint file.
- The December 14, 2023 closing-letter file and all records supporting or explaining the statement that the complaint was withdrawn.
- All records concerning any request to reopen, re-file, reconsider, or continue the matter.
- All records concerning any statute-of-limitations, timeliness, four-year complaint-period, reopening, or new-complaint analysis.
- All records concerning the August 2025 unlicensed-activity complaint, including intake review, enforcement review, criminal-referral review, supervisor review, legal review, and any decision not to proceed.
- All records concerning the contractor's license status, cancellation, non-renewal, reinstatement, bond, insurance, disciplinary history, or authority to solicit or perform work.
- All records concerning the invoice provision or practice stating that "Contractors' Board Disputes" would add a $100 fee if the Board did not find negligence.
- All correspondence with the contractor, the complainant, NSCB staff, NSCB leadership, the Attorney General, the Clark County District Attorney, or any other agency concerning this matter.
- All records showing what written notification of action taken on the complaint was provided to the licensee and to me.
- All public complaint-history, disciplinary-history, citation-history, investigation-history, enforcement-history, license-action, bond-claim, recovery-fund, suspension, cancellation, reinstatement, revocation, probation, fine, settlement, hearing, closure, and public disciplinary records involving Vegas Sprinkler Specialists, LLC dba U.S. Sprinklers, its owners, qualifiers, managing members, agents, associates, salespersons, DBAs, predecessor entities, successor entities, or related entities, whether or not the complaint was filed by Christian Salmon.

3. New Gen Electric, LLC / Carlos Bracho

Please produce all public records concerning:

- New Gen Electric, LLC;
- Carlos Bracho;
- NSCB Case No. 30065100;
- License No. 0091226;
- Christian Salmon / 9060 W. Washburn Road, Las Vegas, Nevada 89149;
- the kitchen-remodel electrical work, complaint, investigation, closure, and any Better Business Bureau-related correspondence or records.

This request includes, without limitation:

- The complete complaint file.
- The March 22, 2024 closing letter and all records showing to whom it was sent.
- All records explaining why the complaint was closed on the basis that the evidence did not support, or was inconclusive regarding, a violation.
- All records showing whether any closing letter, closure notice, disposition notice, action-taken notice, explanation of reasons, appeal information, reconsideration information, or similar record was sent to me.
- All communications between NSCB and New Gen Electric, Carlos Bracho, the Better Business Bureau, Clark County, any inspector, any attorney, or any other agency.
- All internal NSCB communications, supervisor reviews, legal reviews, evidence reviews, investigator notes, disposition notes, and case-management notes concerning this complaint.
- All licensing, bond, insurance, disciplinary, qualifier, monetary-limit, classification, renewal, suspension, reinstatement, and complaint-history records for New Gen Electric, LLC / Carlos Bracho to the extent disclosable.
- All records showing what written notification of action taken on the complaint was provided to the licensee and to me.
- All public complaint-history, disciplinary-history, citation-history, investigation-history, enforcement-history, license-action, bond-claim, recovery-fund, suspension, cancellation, reinstatement, revocation, probation, fine, settlement, hearing, closure, and public disciplinary records involving New Gen Electric, LLC, Carlos Bracho, its owners, qualifiers, managing members, agents, associates, salespersons, DBAs, predecessor entities, successor entities, or related entities, whether or not the complaint was filed by Christian Salmon.

4. Ultimate Service Plumbing LLC / Luis Delgado

Please produce all public records concerning:

- Ultimate Service Plumbing LLC;
- Luis Delgado;
- NSCB Case No. 30063683;
- NSCB Case No. 30068041;
- License No. 0082241;
- Christian Salmon / 9060 W. Washburn Road, Las Vegas, Nevada 89149.

This request includes, without limitation:

- The complete complaint files for Case Nos. 30063683 and 30068041.
- All Notice to Correct records, amended Notice to Correct records, compliance records, permit records, inspection records, proof-of-completion records, closure records, and communications concerning the original repair and later repeated malfunction.
- All records concerning my question to Raymond Zack asking whether the "date of completion" is the date Luis Delgado installed the Stiebel Eltron under-counter unit as a result of my complaint.
- All records showing whether NSCB responded to that question or considered the issue internally.

- All closing letters, closure notices, disposition notices, action-taken notices, reasons for action, final-action records, or similar records sent to Ultimate Service Plumbing LLC, Luis Delgado, or me.
- All internal NSCB communications, supervisor reviews, legal reviews, investigator notes, disposition notes, and case-management notes concerning these matters.
- All licensing, bond, insurance, disciplinary, qualifier, monetary-limit, classification, renewal, suspension, reinstatement, and complaint-history records for Ultimate Service Plumbing LLC / Luis Delgado to the extent disclosable.
- All records showing what written notification of action taken on the complaint was provided to the licensee and to me.
- All public complaint-history, disciplinary-history, citation-history, investigation-history, enforcement-history, license-action, bond-claim, recovery-fund, suspension, cancellation, reinstatement, revocation, probation, fine, settlement, hearing, closure, and public disciplinary records involving Ultimate Service Plumbing LLC, Luis Delgado, its owners, qualifiers, managing members, agents, associates, salespersons, DBAs, predecessor entities, successor entities, or related entities, whether or not the complaint was filed by Christian Salmon.

5. Lisa Bozek / Design Therapy Consulting LLC

Please produce all public records concerning:

- Lisa Bozek;
- Design Therapy Consulting LLC;
- Design Therapy;
- DesignTherapyLB@gmail.com;
- 9729 Peacock Hill Cir, Las Vegas, Nevada 89117;
- 702-461-2913;
- the kitchen-remodel complaint materials submitted by Christian Salmon;
- 9060 W. Washburn Road, Las Vegas, Nevada 89149;
- any allegation, report, investigation, intake review, referral, or decision concerning unlicensed contracting, acting as a contractor without a license, arranging construction work, coordinating licensed or unlicensed subcontractors, or using/arranging contractors while not licensed as a Nevada contractor.

This request includes, without limitation:

- The complete complaint/intake file.
- Any decision not to investigate, not to open a case, not to pursue unlicensed-contracting enforcement, or to refer the matter elsewhere.
- Any correspondence sent to Lisa Bozek, Design Therapy Consulting LLC, Design Therapy, me, any subcontractor, any licensed contractor, or any other agency concerning this matter.
- Any records concerning whether NSCB determined Lisa Bozek, Design Therapy Consulting LLC, or Design Therapy did or did not require a contractor's license for the work at issue.
- Any records concerning criminal referral, civil enforcement, cease-and-desist action, citation, warning, or closure.
- All public complaint-history, disciplinary-history, citation-history, investigation-history, enforcement-history, license-action, bond-claim, recovery-fund, suspension, cancellation, reinstatement, revocation, probation, fine, settlement, hearing, closure, and public disciplinary records involving Lisa Bozek, Design Therapy Consulting LLC, Design Therapy, any related business name, trade name, DBA, agent, associate, salesperson, predecessor entity, successor entity, or related entity, whether or not the complaint was filed by Christian Salmon.

6. Jose Andres Lopez / GC Construction / JJ&D Investments, LLC

Please produce all public records concerning:

- Jose Andres Lopez;
- GC Construction;
- JJ&D Investments, LLC;
- any related name, business name, trade name, DBA, owner, agent, associate, salesperson, predecessor entity, successor entity, or related entity connected to my complaint and the criminal matter referred for prosecution.

This request includes, without limitation:

- Records documenting NSCB's intake, investigation, referral, cooperation with the Clark County District Attorney, communications with me, disciplinary records, closure records, public disciplinary records, and any records concerning restitution, victim participation, or agency follow-through.
- All public complaint-history, disciplinary-history, citation-history, investigation-history, enforcement-history, license-action, bond-claim, recovery-fund, suspension, cancellation, reinstatement, revocation, probation, fine, settlement, hearing, closure, and public disciplinary records involving Jose Andres Lopez, GC Construction, JJ&D Investments, LLC, any related business name, trade name, DBA, owner, agent, associate, salesperson, predecessor entity, successor entity, or related entity, whether or not the complaint was filed by Christian Salmon.

7. Public meeting, disciplinary hearing, board-meeting, and related public records

Please produce all public records, including agendas, agenda packets, supporting materials, staff reports, briefing memoranda, exhibits, minutes, transcripts, audio recordings, video recordings, disciplinary-hearing records, administrative-law-judge records, public-comment records, and board-meeting supporting materials where any of the following were discussed, considered, noticed, heard, voted upon, approved, closed, disciplined, cited, paid, referred, or otherwise acted upon:

- B & F Electric, LLC dba B & F Construction;
- Administrative Citation No. C-2510-4892;
- Case No. 30066199;
- Vegas Sprinkler Specialists, LLC dba U.S. Sprinklers;
- Case No. 30063207;
- New Gen Electric, LLC / Carlos Bracho;
- Case No. 30065100;
- Ultimate Service Plumbing LLC / Luis Delgado;
- Case Nos. 30063683 and 30068041;
- Lisa Bozek;
- Design Therapy Consulting LLC;
- Design Therapy;
- Jose Andres Lopez;

- GC Construction;
- JJ&D Investments, LLC.

For meeting minutes and audio recordings, I request production at no charge under NRS 241.035.

8. Search terms

Please use at least the following search terms, names, and identifiers:

- Christian Salmon
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- Case 30066199
- C-2510-4892
- B & F
- B&F
- B & F Electric
- B & F Construction
- Tim Fromhart
- Timothy Fromhart
- Jerome Blitz
- Paul Amenta
- Evolution Solar
- Eduardo De Posada
- Eduardo Posada
- OutboxTek
- Case 30063207
- Vegas Sprinkler Specialists
- U.S. Sprinklers
- Damien Bilyeu
- Terry Wike
- Jason Pugh
- Case 30065100
- New Gen Electric
- Carlos Bracho
- Case 30063683
- Case 30068041
- Ultimate Service Plumbing
- Luis Delgado
- Raymond Zack
- Lisa Bozek
- Design Therapy Consulting LLC
- Design Therapy
- DesignTherapyLB@gmail.com
- Jose Andres Lopez
- GC Construction
- JJ&D Investments

Withholding/Redaction Log

If any responsive record is withheld or redacted, please provide a Withholding/Redaction Log identifying:

- The record withheld or redacted;
- The date of the record;
- The record type;
- The author, sender, recipient, or custodian, if applicable and disclosable;
- Whether the record is withheld in full or redacted in part;
- The specific legal authority relied upon for withholding or redaction;
- Whether the non-confidential portions can be produced with redactions.

Please do not withhold an entire record if redaction of confidential information would allow production of the non-confidential portions.

Format and fees

Please produce the records electronically by email, secure download link, or other electronic method. I request searchable PDFs where available, native/exported email or PDF with complete header information for emails, and native format for spreadsheets or databases where practical.

I request that no fee be charged because no paper copies are requested. If NSCB contends any fee applies, please provide an itemized written estimate and legal basis before incurring or charging any fee, including the specific authority for the fee, the calculation method, and whether the fee is based on actual cost.

I do not authorize paid copying, media charges, or other costs without prior written notice and my written approval.

Rolling production

Please produce records on a rolling basis. If some records are readily available, please produce those records now rather than delaying production until every search is complete.

Five-business-day response

Please provide the written response required by NRS 239.0107 within five business days, including one or more of the following as applicable:

- Production of readily available records;
- Written notice that NSCB does not have legal custody or control of any requested records, including the name and address of the governmental entity that does have custody or control if known;

Written notice identifying the earliest date and time after which records will be available;

- Written notice of any denial based on confidentiality, including the specific statute or other legal authority making the record, or part of the record, confidential.

Please confirm receipt of this request.

Respectfully,

Christian Salmon
[redacted]

**From:** Susan Broili-Kamesch
**To:** Electrical Exam Seminars
**Subject:** RE: Public Records Request – Pending C-2 Electrical Contractor License Applications
**Attachments:** image002.png
image004.png
image005.png

---

Good morning.

The total number of records meeting criteria defined in your emails below, for the last 6 months, is 157 applications. The information you have requested is contained on 3 pages within the application. Therefore, the total cost to prepare these records is $235.50.

Please advise if you'd like to move forward with this request or if you would like to modify your request.

Once approval for this fee is confirmed, the records will begin to be compiled.

Please be advised that the due date of August 31, 2026 may need to be extended due to the voluminous number of records and amount of time to prepare then.

Thank you.


## Susan Broili Kamesch

***Licensing Administrator***
Nevada State Contractors Board
5390 Kietzke Lane, Ste. 102
Reno, Nevada 89511
Email: sbroili-kamesch@nscb.state.nv.us


-

"Model Regulatory Board"

Please visit our website at https://www.nscb.nv.gov

We, at the Nevada State Contractors Board, value your time and opinion. Please complete our short survey and let us know how well we served you today: https://www.research.net/s/NSCBCustomerSurvey. Thank you!

Please consider the environment before printing this e-mail.


CONFIDENTIALITY NOTICE: This email may contain confidential and privileged material for the sole use of the intended recipient(s). Any review, use, distribution or disclosure by others is strictly prohibited. If you have received this communication in error, please notify the sender immediately by email and delete the message and any file attachments from your computer. Thank you.

**From:** Electrical Exam Seminars [redacted]
**Sent:** Tuesday, August 18, 2026 3:45 PM
**To:** Susan Broili-Kamesch <SBroili-Kamesch@nscb.state.nv.us>
**Subject:** RE: Public Records Request – Pending C-2 Electrical Contractor License Applications

Can you provide the pricing for receiving the public applications related to the electrical examination described in your initial email from January 2026 to the present?

Thank you.

---

**From:** Susan Broili-Kamesch <SBroili-Kamesch@nscb.state.nv.us>
**Sent:** Tuesday, August 18, 2026 7:11 AM
**To:** Electrical Exam Seminars [redacted]
**Subject:** RE: Public Records Request – Pending C-2 Electrical Contractor License Applications

Good morning.

As stated in my first response, the Nevada State Contractors Board does not have the list you are requesting.

You may obtain the records as described in my first response.

Please advise if you would like these records; otherwise, your request will be unable to be completed.

Thank you.


## Susan Broili Kamesch

***Licensing Administrator***
Nevada State Contractors Board
5390 Kietzke Lane, Ste. 102
Reno, Nevada 89511
Email: sbroili-kamesch@nscb.state.nv.us


-

"Model Regulatory Board"

Please visit our website at https://www.nscb.nv.gov

We, at the Nevada State Contractors Board, value your time and opinion. Please complete our short survey and let us know how well we served you today: https://www.research.net/s/NSCBCustomerSurvey. Thank you!

Please consider the environment before printing this e-mail.

CONFIDENTIALITY NOTICE: This email may contain confidential and privileged material for the sole use of the intended recipient(s). Any review, use, distribution or disclosure by others is strictly prohibited. If you have received this communication in error, please notify the sender immediately by email and delete the message and any file attachments from your computer. Thank you.

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**From:** Electrical Exam Seminars [redacted]
**Sent:** Monday, August 17, 2026 4:56 PM
**To:** Susan Broili-Kamesch <SBroili-Kamesch@nscb.state.nv.us>
**Subject:** RE: Public Records Request – Pending C-2 Electrical Contractor License Applications

Ms. Kamesch,

We are interested in obtaining a list of electrical exam applicants from January 2026 to the present date. Please advise what the cost would be for this list.

Thank you.

---

**From:** Susan Broili-Kamesch <SBroili-Kamesch@nscb.state.nv.us>
**Sent:** Friday, August 14, 2026 9:34 AM
**To:** Electrical Exam Seminars [redacted]
**Cc:** publicrecords@nscb.state.nv.us; Sally Putman <SPutman@nscb.state.nv.us>
**Subject:** RE: Public Records Request – Pending C-2 Electrical Contractor License Applications

Good morning.

The Nevada State Contractors Board does not have a list reflecting the information you are requesting.

This agency can provide copies of public applications, however, depending on the date range requested, the fee may be up to $.50 per page if determined to be an excessive request for records.

Regarding your request under #3 in your email below, you are welcome to access each publicly available Board meeting agenda on the NSCB website to perform a key word search for the information. If this agency compiles the information for you, you will be charged a per page fee.

Please advise if you would like to receive copies of applications reflecting applicant name, qualified individual and classification and also the date range requested. Once received, an estimate of cost will be provided.

Finally, payment must be received prior to distribution of records.

Thank you.

**Susan Broili Kamesch**
***Licensing Administrator***
Nevada State Contractors Board
5390 Kietzke Lane, Ste. 102
Reno, Nevada 89511
Email: sbroili-kamesch@nscb.state.nv.us

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"Model Regulatory Board"

Please visit our website at https://www.nscb.nv.gov

We, at the Nevada State Contractors Board, value your time and opinion. Please complete our short survey and let us know how well we served you today: https://www.research.net/s/NSCBCustomerSurvey. Thank you!

Please consider the environment before printing this e-mail.

CONFIDENTIALITY NOTICE: This email may contain confidential and privileged material for the sole use of the intended recipient(s). Any review, use, distribution or disclosure by others is strictly prohibited. If you have received this communication in error, please notify the sender immediately by email and delete the message and any file attachments from your computer. Thank you.

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**From:** Electrical Exam Seminars [redacted]
**Sent:** Thursday, August 13, 2026 3:55 PM
**To:** Public Records Request <PublicRecordsRequest@nscb.state.nv.us>
**Cc:** publicrecords@nscb.state.nv.us
**Subject:** Public Records Request – Pending C-2 Electrical Contractor License Applications

Dear Nevada State Contractors Board,
Pursuant to the Nevada Public Records Act (NRS Chapter 239), I am requesting access to public records related to pending C-2 (Electrical Contracting) license applications currently on file with the Board.
Specifically, we would like to request:

1. A list of applicants who have submitted a C-2 Electrical Contractor license application that is pending, approved-pending-exam, or awaiting the PSI trade/business-and-law examination, for the period of [insert date range, e.g., the last 6 months].
2. For each applicant, to the extent it is part of the public record: applicant/qualifying

individual name, business name (if applicable), classification requested (C-2, C-2d, C-2g, etc.), and application status.

3. Copies of recent Board meeting agendas/exhibits (or the underlying "Ratification of Staff Approved License Applications" attachment lists) that identify C-2 applicants noted as contingent on passing the required exam.

If any of the above cannot be provided in the requested form, please let us know what format is available, or point us to the appropriate public records search tool.

We understand normal application information is deemed public record. Please advise of any applicable copying/processing fees before fulfilling this request.

Thank you for your assistance.

Lynn Woods
Electrical Exam Seminars
[redacted]

**Lenda Murnane**

**From:** WordPress [redacted]
**Sent:** Sunday, November 26, 2023 4:35 PM
**To:** Public Records Request
**Subject:** NSHE PUBLIC RECORDS REQUEST: Eugene Gnandt

⚠ External Email:

NSHE PUBLIC RECORDS REQUEST
==========
Request Type: Electronic Delivery (when file size permits)
From: Eugene Gnandt
Phone: [redacted]
Email: [redacted]
Agency:
Physical Address:
[redacted]

Requested Documents:
All emails between Carol Del Carlo and Mark Doubrava.
All emails between Carol Del Carlo and Jason Geddes.

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This e-mail was sent from a contact form on Nevada System of Higher Education (https://nshe.nevada.edu)

## Lenda Murnane

**From:** NSHE <wp_administrators@nshe.nevada.edu>
**Sent:** Thursday, March 28, 2024 1:04 PM
**To:** Public Records Request
**Subject:** NSHE PUBLIC RECORDS REQUEST: Eli Segall

⚠ External Email:

NSHE PUBLIC RECORDS REQUEST
==========
Request Type: Electronic Delivery (when file size permits)
From: Eli Segall
Phone: [redacted]
Email: [redacted]
Agency: Las Vegas Review-Journal
Physical Address:

Requested Documents:
Digital copies of any economic impact reports, fiscal analysis studies and the like, that were produced by outside companies for the Nevada System of Higher Education since 2014. This request, as further outlined below, also seeks copies of invoices showing what the companies were paid to produce those reports.

The reports sought with this request include, but are not limited to, reports or studies that address:
* Economic impact, economic analysis and economic forecasts
* Fiscal impact, fiscal analysis and fiscal forecasts
* Market research and market analysis
* Real estate analysis, including in regards to land, housing and commercial real estate

As part of this request, please also include:
* Requests-for-proposals issued by NSHE for any of the above-mentioned reports
* Proposals by outside companies that sought to produce any of the above-mentioned reports
* Invoices showing what outside companies were paid to produce any of the above-mentioned reports

Please let me know if you have any questions about this request or need any additional information

Thanks

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This e-mail was sent from a contact form on Nevada System of Higher Education (https://nshe.nevada.edu)

**From:** NSHE
**To:** Public Records Request
**Subject:** NSHE PUBLIC RECORDS REQUEST: Danielle Bennett
**Date:** Tuesday, June 4, 2024 12:33:14 PM

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External Email:

NSHE PUBLIC RECORDS REQUEST
==========

Request Type: Electronic Delivery (when file size permits)
From: Danielle Bennett
Phone: [redacted]
Email: [redacted]
Agency: American Civil Liberties Union of Nevada
Physical Address:
[redacted]

Requested Documents:
I am requesting any and all records relating to investments in or financial ties to companies with ties to Israel, weapons manufacturing, or weapons distribution, including but not limited to:
AeroVironment
Agilite
Ahava
Aimpoint AB
Airbnb
AM General
Amazon
Atlas Air of Purchase/Appollo Asset Management/J.F. Lehman & Company/Hill City Capital
Axa
BAE Systems
Barclays
Boeing
Booking.com
Cadre Holdings Inc.
CAF
CAL Cardo Airlines/Challenge Airlines
Caltex
Carrefour
Caterpillar
Chevron
Colt/Colt CZ Group SE
Corsight AI
Day & Zimmerman
Disney
DJI
Dynamit Nobel Defense
Elbit Systems
Elvo
Emtan Karmiel
Expedia
Flyer Defense
Ford Motor Company
Genasys Inc.
General Dynamics
General Electric

General Mills
General Motors
Genie Energy Ltd.
Ghost Robotics
Google/Alphabet
HD Hyundai
Hewlett Packard
HIK Vision
Hoplite Group
InfiniDome
Intel
Israel Aerospace Industries
Israel Shipyards
JCB/J.C. Bamford Excavators Limited
Kalitta Air
L3Harris Technologies Inc.
Leonardo SpA/DRS Sustainment Systems
Leupold & Stevens
Lockheed Martin
MDT Armor/Shladot
Meprolight
Mercedes-Benz
Motorola
National Airlines
NextVision
Nordic Ammunition Company (Nammo)
Northrup Grumman
Oshira
Oshkosh Corporation
Overseas Shipholding Group
Paz Oil
Planatir Technologies
Plasan
Pratt & Whitney
Puma
Rafael Advanced Defense Systems
ReMax
Renk Group
Rheinmetall AG
Rolls-Royce Holdings
RTX/Raytheon
s Manufacturing Company
Shield AI
Siemens
Sigmatech Inc.
SK Group
Skydio
Smartshooter
Soda Stream
SpearUAV
Sturm Ruger & Co
Teva
Texaco
Textron
ThyssenKrup
TKH Security
Toyota

TripAdvisor
Uni-Scope
Valero Energy Corporation
Volvo
Western Global Airlines
Woodward/Woodward HRT
Xtend

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This e-mail was sent from a contact form on Nevada System of Higher Education (https://nshe.nevada.edu)

**Stephanie Mears**

**From:** [redacted]
**Sent:** Wednesday, July 8, 2026 12:04 PM
**To:** State Archives
**Subject:** Nevada Public Records Act Request — Session Laws and Historical Code (GavelSight LLC)

**[You don't often get email from [redacted] Learn why this is important at https://aka.ms/LearnAboutSenderIdentification ]**

**WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.**

**To the Administrator, Nevada State Archives, Department of Administration:**

**Under the Nevada Public Records Act, NRS 239.010, GavelSight LLC requests public records concerning the Laws of Nevada — the State's session laws — and the historical compilations of Nevada's statutory code.**

**V3 EVIDENCE FUSION — worker closeout of record (fused 2026-07-05).**

**This section states, on the record, exactly what GavelSight already captured directly from NV's own official sources, exactly what remained blocked or absent, and the precise access GavelSight seeks. It is the factual predicate for the grounds that follow, and it forecloses the response that the material is "already on the website."**

**- WHAT GAVELSIGHT CAPTURED FROM CLEAN OFFICIAL SOURCES: 0. Accounted across 1169 from official hosts (www.leg.state.nv.us LCB Law Library/NRS/Statutes; NSLA and LCB Research Library finding aids only). Held bodies carry full provenance — raw bytes, source URL, source host, fetch timestamp, and a SHA-256 checksum.**
**- WHAT REMAINS MISSING OR BLOCKED: Storage guard fired with /Volumes/overflow about 188 MiB free; manifest maps 835 live NRS chapter targets, 824 local markdown files without raw SHA, 319 Statutes of Nevada entrypoints across 109 session folders, and access-only rows for territorial laws, historical code editions, superseded snapshots, and bulk/export Missing-provenance count among held bodies: not applicable for new raw bodies; existing current-code markdown lacks raw provenance. Banned-vendor delivery hits in the held corpus: 0 banned-vendor delivery-path hits in official LCB NRS/Statutes probes.**
**- BLOCKER CLASS: TARGET-MAP ONLY (official source map proven; no clean raw-provenance corpus held yet — capture pending storage/access).**
**- WHY THE PUBLIC WEBSITE IS INSUFFICIENT: Nevada has clean official LCB pages for current NRS and Statutes of Nevada, but website availability is not corpus possession: no raw law bodies were fetched under the storage guard, current code is current-only, session laws still need body expansion, and territorial/historical/superseded/bulk materials remain missing**
**- THE PRECISE ACCESS GAVELSIGHT SEEKS: Storage/offload before raw fetch; current NRS raw-byte provenance; full Statutes of Nevada body crawl/export for 1864-2025; territorial laws 1861-1864; historical code editions/supplements; superseded NRS snapshots; bulk/API/source database export; NSLA/LCB physical-holdings inventory and direct official files**
**- SUPPORTING RECORD (available to the custodian on request): Application/states/NV/NV_STATUTES_PLANB_CERTIFICATION_2026-07-05.md; Application/states/NV/nv_statutes_official_manifest_2026-07-05.jsonl;**

**Application/states/NV/nv_statutes_coverage_matrix_1861_2026_2026-07-05.csv; Application/states/NV/nv_statutes_foia_access_targets_2026-07-05.csv.**

**GavelSight does not treat current-code capture as historical statute completion, and does not treat NV's law as "done" simply because a current-code interface exists. Every statute, session law, chaptered/enrolled act, and historical or superseded code edition the jurisdiction ever passed or officially published — from earliest territorial/statehood coverage through the present — is within the scope of this request until it is represented with clean, government-sourced provenance.**

**GavelSight opens by stating what it has already done and what it recognizes the State does well, because both define where this request begins.**

**WHAT NEVADA DOES WELL — AND GAVELSIGHT KNOWS IT. The Nevada Legislature publishes the Nevada Revised Statutes on leg.state.nv.us/NRS/ in HTML and PDF formats, with a programmatic API that makes the current statutory code accessible in a way most states do not match. GavelSight has used that resource and has already downloaded 825 NRS files directly from the Legislature's servers. Nevada also publishes its session laws — the Statutes of Nevada — in a collection that reaches back to the first Territorial session in 1861. That is extraordinary. Most states publish session laws online starting in the 1990s or 2000s at best; Nevada's collection spans over 160 years. GavelSight recognizes this as among the most complete session-law archives any state makes available.**

**A NOTE ON WHAT THIS REQUEST IS — AND IS NOT. GavelSight is not asking the State to build a website, create new records, or do anything it has not already done. The State necessarily holds the source files from which its website is built — the database, the XML or word-processing source, the typesetting files used to produce the compiled statutes. Those source files are public records. This request asks the State to copy them and provide them — the same act of production that any public-records request contemplates. Directing a requester to browse a website page by page is not a records production. It is the equivalent of telling someone to photograph each page of a book rather than handing them the book. The State holds the book.**

**THE GAP — AND WHY "IT'S ON OUR WEBSITE" DOES NOT ANSWER THIS REQUEST. GavelSight has independently audited every official NEVADA state website that publishes statutory materials. The following are the specific, independently sufficient grounds for this request. Each stands on its own. Each is a separate and complete basis for the production GavelSight seeks. A response that addresses one while ignoring the others does not satisfy the request:**

**GROUND 1 — NO BULK DOWNLOAD EXISTS. The Nevada Revised Statutes are published at leg.state.nv.us/nrs/ as individual HTML chapter pages — GavelSight has downloaded 825 of them, one at a time, because no alternative exists. Nevada offers no ZIP archive, no database export, no XML or JSON feed, and no API. The Legislative Counsel Bureau maintains the master statutory database internally; the only public path is to navigate the table of contents at leg.state.nv.us/law1.html and click through each chapter individually. Posting that database as a downloadable archive costs nothing and satisfies every future requester at once. Colorado, for comparison, offers its entire Revised Statutes as downloadable ZIP archives in HTML, PDF, and DOCX, and provides its official SGML database on request. Nevada can do the same.**

**GROUND 2 — SCRAPING IS NOT A SUBSTITUTE FOR A RECORDS PRODUCTION. GavelSight acknowledges that Nevada's statute site uses straightforward HTML and does not employ aggressive bot-blocking technology. GavelSight's engineers were able to extract the current NRS chapter by chapter. But the fact that a well-resourced engineering team can reverse-engineer a website does not convert that website into a records production. The NRS contains thousands of individual sections spread across hundreds of chapter pages, each requiring a separate HTTP**

request, and the site's navigation and search functions require JavaScript to operate. A citizen without GavelSight's technical resources faces a site designed for one-at-a-time browsing, not bulk retrieval. The State holds the source database from which the website is generated; producing a copy of that database is simpler for the State than the scraping effort is for the requester — and it satisfies every future requester at once.

GROUND 3 — SESSION LAWS LACK BULK ACCESS AND PRE-STATEHOOD COVERAGE IS ABSENT. GavelSight recognizes that Nevada publishes an unusually complete session-law collection: the Statutes of Nevada from the 1st Session (1864) through the 83rd Regular Session (2025), including all special sessions, are listed at leg.state.nv.us/law1.html with individual chapter HTML pages. That is among the deepest session-law archives any state makes available. However, these session laws are accessible only one chapter at a time — there is no bulk download of any session volume, no ZIP archive, and no compiled PDF. A researcher studying 160 years of Nevada legislation must click through thousands of individual pages. More significantly, the Laws of the Territory of Nevada (1861-1864) — the four sessions of territorial legislation that preceded statehood — are entirely absent from the Legislature's site and available only through commercial subscription services or physical archives. Session laws are the primary legal authority: when a court must determine what the legislature actually enacted, the session law controls. The territorial sessions established the legal foundation on which the State was built; their absence from the State's own site is a gap this request targets.

GROUND 4 — HISTORICAL CODE EDITIONS ARE ABSENT. Nevada publishes only the current NRS on its website. No prior compiled editions — not the original 1957 NRS, not the 1929 Nevada Compiled Laws (or its supplements), not the 1912 Revised Laws, not the 1900 Cutting compilation, not the 1885 Bailey & Hammond compilation, not the 1873 Bonnifield & Healy compilation — are available in any digital form on any official state website. These editions exist in print at the Nevada Supreme Court Law Library, the State Archives (NSLA), and the Research Library; some have been digitized by HeinOnline for subscription access. But a citizen seeking to determine what Nevada law said in 1920 or 1940 has no path through the State's own systems. A statute that was in force decades ago and has since been repealed or amended is part of Nevada's legal history and may still govern vested rights, pending litigation, or retroactive analysis. The historical editions are public records.

GROUND 5 — THIS IS A REASONABLE REQUEST AND THE RIGHT THING TO DO. GavelSight is not filing this request to make a point or to test the public-records process. GavelSight will read every statute NEVADA produces — every section, every session law, every historical compilation, cover to cover. GavelSight is building the most comprehensive legal-research system ever constructed: one that cross-references every state's statutes with its courts' own opinions so that any citizen — any NEVADA citizen — can trace a statute from its first enactment through every amendment to the present day, see what the courts have held it means, and do so without paying a commercial vendor for access to the government's own work. That system does not exist today. GavelSight is building it, state by state, and NEVADA's contribution is a file transfer the State already has the capacity to make. These records should have been posted as bulk downloads years ago. Every state that publishes its law in machine-readable form eliminates this request entirely and serves every future researcher, journalist, lawyer, and citizen at once. GavelSight asks NEVADA to join them. The production is straightforward, the cost is minimal, and the public benefit is permanent.

THE REQUEST — stated so either remedy fully satisfies it:

(a) PUBLISH THE RECORDS — post the session laws in machine-readable form (searchable text, OCR-corrected PDFs, or natively-digital files) and the historical code-edition snapshots as downloadable files on the State's own systems. This resolves the request for every future requester at once; or

**(b) PRODUCE THE RECORDS — provide copies of: (i) the Statutes of Nevada (session laws) from the first Territorial session (1861) through the most recent completed session, in the best available machine-readable form — natively-digital files for modern sessions, OCR text for older sessions, raw scans only where no text layer exists; (ii) any pre-statehood territorial enactments, provisional codes, or organic acts the Archives holds; (iii) historical NRS edition snapshots and any superseded statutory compilations (Nevada Compiled Laws, etc.) in electronic form; by download link, bulk transfer, or media at GavelSight's expense.**

**OBJECTIONS ANSWERED IN ADVANCE, so this resolves in one round:**

**- "Browse the website." The NRS site at leg.state.nv.us/nrs/ presents the current code as individual HTML chapter pages with JavaScript-dependent navigation and search. A citizen seeking Nevada's full statutory corpus must click through hundreds of chapter pages one at a time, with no export, no download, and no API. The State holds the source database from which the site is built; those source files are the public records this request seeks. A website is an interface, not a records production.**

**- "The NRS is already online." Yes — the current NRS, and GavelSight has it. This request is for the historical code editions (1873 through the original 1957 NRS), the territorial-era enactments (1861-1864), and a bulk export of the current NRS in machine-readable form — none of which is available on the Legislature's current site. A reference to leg.state.nv.us/NRS/ does not address the gap.**

**- "The session laws are already online." Nevada's session-law collection is extensive and GavelSight acknowledges that. But the collection is accessible only one chapter at a time — no bulk download exists for any session volume. And the pre-statehood territorial sessions (1861-1864) are entirely absent. This request targets those gaps plus the historical code editions that are not on the site at all.**

**- "Obtain them from LexisNexis or Westlaw." A commercial publisher's product is not the public record. The Supreme Court of the United States made clear that no one can own the law. Georgia v. Public.Resource.Org, Inc., 590 U.S. 255 (2020). Steering a requester to a private vendor's proprietary edition of the State's own enactments is the precise arrangement that decision condemned.**

**- "The purpose of the request / commercial requester." NRS 239.010 grants the right to inspect and copy public records to "any person" and does not condition access on the requester's purpose. The enacted law of Nevada belongs to the public, for any lawful use.**

**- "Burdensome." GavelSight asks for existing records in existing electronic form. Session laws are enacted in public, published in public, and carry no exemption. Nothing needs to be created, compiled, or reviewed for confidentiality. Rolling production by decade or era is welcome — GavelSight will take 1861-1900 first if that is simplest. GavelSight pays reasonable charges for electronic copies per NRS 239.055.**

**- "Wrong custodian." If the Legislative Counsel Bureau, the State Library, or another office holds a portion, please identify the custodian and forward the request per NRS 239.0107. GavelSight asks that the Archives produce what it holds in the meantime.**

**FOR CONTEXT. GavelSight LLC is building the most authoritative legal-research foundation that has ever existed — a system in which every statute traces to the government that enacted it, sourced directly from the State, with no vendor intermediary and no paywall. Nevada already**

publishes one of the strongest current-code interfaces in the country, and its session-law archive reaching to 1861 is among the deepest anywhere. This request asks for the last piece: those session laws in machine-readable text, the historical code editions, and the Territorial-era records that complete the picture. Most recently, Virginia pointed GavelSight to a site that already had its entire Code in bulk-downloadable PDF, HTML, and DOCX — no special production needed. States that publish this way resolve every future request at once at no additional cost.

SO THAT THIS REQUEST CAN BE RESOLVED IN A SINGLE RESPONSE. The following provisions are part of the request. Each removes a reason to pause, telephone, or write back before producing. Nothing in this section narrows the request; it exists so the office can act on this letter alone.

1. FEES — PRE-AUTHORIZED. GavelSight LLC pre-authorizes reasonable, itemized, actual duplication and retrieval costs up to $100 without further correspondence. Processing should not be suspended to await fee confirmation within that authorization. If estimated costs exceed it, the office is asked to produce the records that fall within the authorization and provide a written, itemized estimate for the remainder. A fee estimate does not withdraw or suspend any part of this request.

2. CLARIFICATION — DOES NOT STOP THE CLOCK. If any item is considered ambiguous, the office is asked to identify that item in writing and to continue processing and producing every unambiguous item without delay. A question about one item is not a basis to hold the rest.

3. ROLLING PRODUCTION — AUTHORIZED. Records may be produced as they are located, in any order. No portion should be held pending completion of the whole.

4. DELIVERY — ELECTRONIC. Production by download link, bulk transfer, or SFTP/cloud transfer (GavelSight operates a receiving endpoint), or by physical media at GavelSight's expense. Where records exist electronically, an offer of in-person inspection is not a substitute for copies; the request is for copies of the electronic records themselves.

5. PARTIAL WITHHOLDING — PRODUCE THE REST. If any record is withheld in whole or in part, the office is asked to produce everything else and to identify, in writing, each withheld record and the specific statutory exemption claimed for it. Withholding some records is not a basis to delay the remainder, and segregable non-exempt portions are requested.

6. IF NO RESPONSIVE RECORDS ARE HELD. For any item the office concludes it does not hold, a written statement to that effect identifying that item — and, where known, the agency or office that does hold it — is requested, so the item can be directed to the correct custodian without a second exchange.

7. ELECTION AND WRITTEN COURSE OF DEALING. Either remedy stated in this request — publication or production — fully satisfies it, at the office's election. No conference or discussion is required; this letter is intended to contain everything needed to act on it. All communications concerning this request should be in writing, by reply to the address from which it was transmitted.

A written response is requested within five business days per NRS 239.0107, identifying which remedy the Archives elects, the format, and a timeframe. If any record is withheld, a written statement citing the specific statutory exemption is requested per NRS 239.0107. All grounds — statutory, common-law, and constitutional — are expressly reserved.

**Respectfully,**
**GavelSight LLC**
[redacted]

Gmail Antinette Maestas <maestas.a@barber.nv.gov>

# Important Nevada Public Records Request

3 messages

**Shirley Tanaka** [redacted] Mon, Aug 17, 2026 at 11:25 AM

To: "emrb@emrb.nv.gov" <emrb@emrb.nv.gov>, "fidmaster@fid.state.nv.us" <fidmaster@fid.state.nv.us>, "nhdinfo@housing.nv.gov" <nhdinfo@housing.nv.gov>, "mcs@dir.nv.gov" <mcs@dir.nv.gov>, "mines@business.nv.gov" <mines@business.nv.gov>, "WCSHelp@dir.nv.gov" <WCSHelp@dir.nv.gov>, "mail1@labor.nv.gov" <mail1@labor.nv.gov>, "mldinfo@mld.nv.gov" <mldinfo@mld.nv.gov>, "nta@nta.nv.gov" <nta@nta.nv.gov>, "RecordRequests@red.nv.gov" <RecordRequests@red.nv.gov>, "taadministration@taxi.state.nv.us" <taadministration@taxi.state.nv.us>, "cpa@nvaccountancy.com" <cpa@nvaccountancy.com>, "phlade@adgc.nv.gov" <phlade@adgc.nv.gov>, "information@nvababoard.org" <information@nvababoard.org>, "nsbaidrd@nsbaidrd.nv.gov" <nsbaidrd@nsbaidrd.nv.gov>, "atrainer@nsbat.nv.gov" <atrainer@nsbat.nv.gov>, "info@barber.nv.gov" <info@barber.nv.gov>
[redacted]
"chirobd@chirobd.nv.gov" <chirobd@chirobd.nv.gov>, "publicrecordsrequest@nscb.state.nv.us" <publicrecordsrequest@nscb.state.nv.us>, "info@nvcosmo.com" <info@nvcosmo.com>, "nsbde@dental.nv.gov" <nsbde@dental.nv.gov>, "info@nvopticians.org" <info@nvopticians.org>, [redacted] "nvfuneralboard@fb.nv.gov" <nvfuneralboard@fb.nv.gov>, [redacted] <support@certemy.com>, "nvmassagebd@lmt.nv.gov" <nvmassagebd@lmt.nv.gov>, "nsbme@medboard.nv.gov" <nsbme@medboard.nv.gov>, "nursingboard@nsbn.state.nv.us" <nursingboard@nsbn.state.nv.us> [redacted] "teambc@pharmacy.nv.gov" <teambc@pharmacy.nv.gov>, "ptapplication@govmail.state.nv.us" <ptapplication@govmail.state.nv.us>, "nvpodiatry@bop.nv.gov" <nvpodiatry@bop.nv.gov>, "board@nvbpels.nv.gov" <board@nvbpels.nv.gov>, "nbop.admin@govmail.state.nv.us" <nbop.admin@govmail.state.nv.us>, "pilbinfo@pilb.nv.gov" <pilbinfo@pilb.nv.gov>, "socwork@besw.nv.gov" <socwork@besw.nv.gov>, "vetbdinfo@vetboard.nv.gov" <vetbdinfo@vetboard.nv.gov>

PUBLIC RECORDS REQUEST

Under the authority of the Nevada public records law, I request public records maintained from November 2023 through the present concerning instances in which the Department of Business and Industry Director's

Office became involved in matters that were otherwise being handled by your division, board, commission, bureau, program, or agency.

Specifically, I am requesting records involving Perry Faigin, Dr. Kristopher Sanchez, Marcel Schaerer, Nikki Haag, Amanda Flocchini (Johnson) or other Director's Office employees when they reviewed, commented on, participated in, approved, rejected, modified, delayed, directed, recommended, or otherwise became involved in a matter that was originally being handled within your office.

This request includes, but is not limited to, matters involving:

- Enforcement actions;
- Investigations;
- Licensing decisions;
- Administrative complaints;
- Settlement discussions;
- Penalty recommendations or assessments;
- Audits or examinations;
- Regulatory actions;
- Employee misconduct investigations; (including but not limited to timesheet fraud, sexual misconduct, or substance abuse)
- Ethics complaints;
- Conflicts of interest;
- Retaliation complaints;
- Personnel investigations;
- Workplace safety concerns; and
- Misuse of state resources;

I am interested in understanding the extent to which the Director's Office became involved in decisions that would ordinarily be made by the individual divisions, boards, commissions, bureaus, programs, or agencies within the Department.

This request is not limited to final decisions. It also includes situations where the Director's Office was consulted before a decision was made, asked to provide input, requested updates, attended meetings concerning a matter, requested additional information, or otherwise participated before the matter was resolved.

Please include records such as emails, Microsoft Teams messages, text messages, memoranda, meeting invitations, calendars, briefing materials, presentations, notes, routing communications, recommendations, draft decision documents, approval requests, status updates, attachments, and similar records reflecting the Director's Office's involvement.

If responsive records are maintained by both your office and the Director's Office, please search both locations for responsive records.

To assist in locating responsive records, searches may include communications referencing Perry Faigin, Kristopher Sanchez, Marcel Schaerer, Nikki Haag, Amanda Flocchini (Johnson), the Director's Office, Director Sanchez, enforcement, settlement, investigation, licensing, penalty, audit, examination, personnel matter, fraud, employee complaint, ethics, retaliation, conflict of interest, management review, or similar terms.

If any records are withheld or redacted, please identify the specific statutory basis for the withholding and produce all reasonably segregable nonconfidential portions as required by the Nevada public records law.

I request production in electronic format.

From: Tahoe Multisport [redacted]

Sent: Friday, September 18, 2026 7:38 AM

To: stparks stparks@parks.nv.gov

Subject: To the Nevada Division of State Parks Public Information Officer:

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

To the Nevada Division of State Parks Public Information Officer:

Pursuant to the Nevada Public Records Act, NRS Chapter 239, Tahoe Multisport LLC requests electronic copies of the public records described below.

Time Period

January 1, 2022 through the date the search for responsive records is conducted.

Records Requested

Please provide all communications, records, photographs, videos, screenshots, attachments, and other materials sent to, received by, forwarded by, or exchanged between Nevada Division of State Parks personnel and any

owner, employee, representative, agent, or person associated with any of the following businesses or operators, where the communication or record mentions, depicts, discusses, complains about, reports on, or otherwise concerns Tahoe Multisport LLC, Sand Harbor

Kayak, Sand Harbor Multisport, JP Donovan/John Donovan, Belinda Quene, or Tahoe Multisport employees or operations:

- 

Tahoe Jack's

- 

Clearly Tahoe

- 

Tahoe Paddle Sports / Tahoe Tony's

- 

Tahoe Adventure Company

- 

Any other commercial non-motorized watersports operator or applicant at Sand Harbor that communicated with State Parks concerning Tahoe Multisport

This request includes, without limitation:

SMS and MMS text messages; iMessages; other electronic or app-based messages; emails; photographs; videos; screenshots; attachments; forwarded communications; records or notes of complaints; and communications among

State Parks personnel forwarding, discussing, responding to, investigating, or acting upon such materials.

We specifically request records concerning allegations or reports that Tahoe Multisport or its owners, employees, guides, vehicles, trailers, kayaks, guests, or other operations were violating or operating outside the

terms of a permit, SCUP, contract, park rule, policy, direction, or operational requirement.

This includes, but is not limited to, records concerning:

- 

Rental activity or allegations that Tahoe Multisport was conducting rentals;

- 

Numbers of kayaks, boats, guides, guests, vehicles, shuttles, or trailers;

- 

Launching, recovering, transporting, or shuttling guests;

- 

Parking or vehicle access;

- 

Additional or backup trailers;

- 

Guests originating from or being transported from locations outside Sand Harbor;

- 

Employee uniforms or clothing;

- 

Equipment placement or storage;

- 

Tour operations;

- 

Safety practices or incidents;

- 

Weather-related operations;

- 

Photographs or videos purporting to document violations;

- 

Complaints or allegations regarding Tahoe Multisport's compliance with its permit, SCUP, contract, or State Parks requirements; and

- 

Tahoe Multisport's performance, compliance history, or suitability to receive or continue a commercial permit or contract.

State Parks Personnel/Custodians

The search should include records maintained by or involving personnel who worked at Sand Harbor, the Tahoe Region, or Division administration during the requested period, including, but not limited to:

Makaila Erdody, Allen Wooldridge, Marisa Cook, Brett Hartley, Kevin Fromherz, Sand Harbor rangers and supervisors, Tahoe Region personnel, and any other State Parks employee who received, was forwarded, reviewed, discussed,

or responded to communications concerning Tahoe Multisport.

Please do not limit the search to the specifically named custodians if other State Parks personnel possess responsive records.

Text Messages, Photographs and Videos

Because a significant purpose of this request is to obtain communications reportedly made to State Parks personnel by competing commercial operators through text messages and photographs/videos sent by cellular telephone,

please specifically search State-issued mobile devices, retained text-message records, messaging systems, email accounts, and other repositories reasonably likely to contain these records.

To the extent State-business communications responsive to this request were conducted or retained on personal devices, personal email accounts, or other non-State communications systems and constitute public records

subject to NRS Chapter 239, please include those responsive records as well.

For photographs and videos, please provide the original electronic file where reasonably available, including associated metadata retained by the agency, rather than only a printed copy or screenshot.

Please also include the communication accompanying or transmitting each photograph or video and any subsequent forwarding, response, or internal discussion of that material.

Complete Conversations

Where a responsive message is part of a longer text-message conversation, email thread, or other communication chain necessary to understand its context, please provide the complete responsive conversation or sufficient

surrounding messages to preserve the context and meaning of the communication.

Electronic Format

Please provide the records electronically in their existing electronic format where reasonably practicable.

If portions of responsive records are confidential or otherwise exempt from disclosure, please redact or segregate those portions and provide the remainder of the record, together with the applicable legal authority

supporting each withholding or redaction.

If the Division determines that any portion of this request requires clarification or narrowing, please contact us before excluding potentially responsive records. We are willing to work with the Division to reasonably

focus searches while preserving the categories of records described above.

Because this request specifically encompasses electronic communications, photographs, videos, and text messages that may be subject to ordinary retention or deletion practices, please preserve potentially responsive

records while this request is pending.

Thank you for your assistance.

JP Donovan

Tahoe Multisport

Sent from my iPhone

**From:** Patricia Olmstead
**To:** AGGeneralCounsel
**Subject:** Public Records Survey responses
**Date:** Monday, September 28, 2026 11:28:26 AM
**Attachments:** image001.png

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Hello,

Please see responses to the Public Records survey below.

1. Up to three (3) examples of public records requests your Government Entity deemed overbroad or unduly burdensome, and –
    a. The Nevada Department of Taxation ("Department") is in receipt of your public records request received October 16, 2024, requesting any and all correspondence between the Nevada Department of Taxation's senior leadership – including Shellie Hughes, Yvonne Nevarez-Goodson, Joe Bernardy, Jeff Mitchell – and any individual working in the Nevada Office of the Governor between the dates of January 3, 2023, and October 3, 2024.
    b. All emails, email attachments, Microsoft Teams direct messages, group messages, channel messages, meeting-chat messages, and documents shared through those communications that concern or refer to (employee name) or his employment with the Department of Taxation. This request includes communications between or among the identified custodians, other Department of Taxation employees, the Division of Human Resource Management, the Office of the Attorney General, or other State officials concerning: his probationary or employment status; his job performance, conduct, supervision, management style, working relationships, or interactions with employees; his three-month evaluation, performance evaluation, performance improvement plan, or PIP; complaints, allegations, concerns, investigations, interviews, witness statements, or reports concerning him; grievances filed by him or grievances he was alleged to have discussed or assisted with; team assignments, employee reassignment, training, supervisory responsibilities, attendance, leave, discipline, demotion, reversion, separation, or termination involving him. To reduce duplication and the burden of production, the initial production may exclude communications in which Mark Helton was a sender or recipient, except when those messages are necessary to provide the complete context of a responsive conversation or thread. Please include the complete conversation or thread, attachments, sender and recipient information, dates and times, subject lines, Teams conversation or channel names, and other reasonably available metadata necessary to understand the communication. Please provide the records electronically, preferably as searchable PDFs or in a Microsoft 365 export format

that preserves conversation context and metadata. I request rolling production of responsive records as they become available.

2. A copy of your Government Entity's fee schedule. – The Department of Taxation does not have a fee schedule.

***Important Notice:** *Sales & Use Tax Returns are now due on the 20th of the month. Please file all Modified Business Tax and Commerce Tax returns through My Nevada Tax.*


*Patricia Olmstead*
Public Information Officer
Nevada Department of Taxation
9850 Double R Blvd.
Reno, NV 89521
Phone: 775-687-9998
Email: polmstead@tax.state.nv.us

Mailing Address:
3850 Arrowhead Drive
Carson City, NV 89706


Find careers at: NVJobs


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**From:** Julie Wootton-Greener
**To:** AGGeneralCounsel
**Subject:** Supplemental materials for Public Records Taskforce survey
**Date:** Wednesday, October 7, 2026 8:41:57 AM
**Attachments:** image001.png

---

Good morning,

Below are supplemental materials from the Nevada Department of Education in response to the Public Records Taskforce survey. Please let me know if additional information or clarification is needed.

Thank you.

---

**Fee Schedule for Public Records Requests:**
No fees will be assessed until total costs reach $10. If the cost of producing the records is estimated to be more than $10, the records will not be produced until payment is received, unless a decision to waive fees has been made.

**Copying fees:**

- Black & white, 8 %" x 11" $0.03 per page
- Black & White, 8 %" x 14" $0.06 per page
- Color up to 8 %" x 14" $0.10 per page
- Electronic scanning to CD $5 per disc
- Certified true copies: $5 per page

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Up to three (3) examples of public records requests your Government Entity deemed overbroad or unduly burdensome

- **12/1/25**

Dear Public Records Officer,
Under Nevada Revised Statutes Chapter 239, I request copies of the following records (2019–2025) in the possession of Superintendent Jhone Ebert or the Nevada Department of Education:
1. All annual lists of “resources that reflect nationally accepted best practices for addressing the rights and needs of persons with diverse gender identities or expressions” distributed pursuant to NAC 388.880(5), including dates of distribution and any approval signatures.
2. All emails, memos, or correspondence to/from Jhone Ebert containing the terms: “NAC 388.880,” “best practices,” “gender identity,” “GLSEN,” “HRC Welcoming Schools,” “transgender student,” “parental notification,” or “confidentiality” in connection with NRS 388.133 or student gender policies.

3. Any meeting agendas, minutes, or briefing materials presented by or to Superintendent Ebert regarding gender identity guidance, confidentiality, or NAC 388.880 compliance.
4. All training materials or guidance documents approved or distributed by Superintendent Ebert related to supporting transgender or gender-diverse students.
I request these records in electronic format (PDF or searchable text) and ask that fees be waived as the disclosure is in the public interest. If fees exceed $25, please notify me first. Thank you.

- **One constituent filed 13 separate public records requests in April 2026 and an additional 12 separate requests in August 2026. All of the requests were for electronic summaries of purchase orders.**

- **5/17/26**

Pursuant to Nevada public records law, I respectfully request copies of records related to the creation, development, branding, procurement, implementation, and operation of the "Nevada COMPASS" program, platform, mobile application, and/or related initiatives. This request includes, but is not limited to:
1. Creation and Development
* Records regarding the origin, conception, naming, branding, or development of Nevada COMPASS * Internal communications discussing the name "Nevada COMPASS" * Planning documents, proposals, concept papers, meeting notes, or presentations
2. Procurement and Contracts
* Requests for proposals (RFPs), requests for information (RFIs), scopes of work, bids, contracts, amendments, purchase orders, invoices, and vendor agreements related to Nevada COMPASS * Records identifying any contractors, subcontractors, developers, consultants, nonprofits, or partner organizations involved
3. Funding Sources
* Records identifying funding sources, including federal grants, state appropriations, McKinney-Vento funding, ESSER funding, or other grant programs used for development or implementation
4. Data Sharing and Privacy
* Data-sharing agreements, memorandums of understanding (MOUs), privacy policies, FERPA-related reviews, cybersecurity assessments, or legal analyses related to the platform * Records identifying what user data is collected, stored, shared, or accessible through the platform
5. Communications
* Communications between NDE employees, contractors, vendors, nonprofits, advocacy organizations, school districts, or partner agencies regarding Nevada COMPASS * Communications referencing branding concerns, naming discussions, trademark considerations, or confusion with similarly named Nevada organizations or initiatives
6. Public Rollout and Implementation
* Rollout plans, onboarding materials, training materials, pilot program documentation, implementation timelines, and statewide deployment records *

Records identifying participating agencies, districts, schools, or providers
7. Domains and Technology
* Records regarding website/domain registration, hosting, software platforms, app development infrastructure, or ownership/administration of associated domains or applications
Please provide records in electronic format where possible. If any portion of this request is denied, please cite the specific legal exemption relied upon and provide all segregable non-exempt portions. Thank you for your time and attention to this request.

Julie Wootton-Greener
Public Information Officer
Nevada Department of Education
julie.woottongreener@doe.nv.gov
Desk: (702) 486-6602

NEVADA
Department of
Education

**Corina Jimenez**

**To:** Corina Jimenez
**Subject:** RE: Information request

**From:** Nursing Board <nursingboard@nsbn.state.nv.us>
**Sent:** Tuesday, February 17, 2026 2:43 PM
**To:** Corina Jimenez <cjimenez@nsbn.state.nv.us>
**Subject:** FW: Information request

**From:** Emily [redacted]
**Sent:** Saturday, February 14, 2026 3:44 PM
**To:** Nursing Board <nursingboard@nsbn.state.nv.us>
**Subject:** Information request

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

I want to know how many LPNs and how many RN are in Nevada with active licenses. I also want to know how many of LPN and how many RN have a history of discipline against their licenses. I want to know how many LPNs and how many RN had discipline against their licenses in 2000. 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, and so far in 2026. I want the information broken down to tell which types of discipline are probation, letter of reprimand, etc. I want to know if the history of discipline causes a nurse's license to be publicly flagged, and if so, for how long. I want to know what actions usually cause a nurse to receive an LOR. I want to know what actions can cause a nurse to receive an LOR, and I want to know what actions most often cause a nurse's license to be flagged with an LOR. Please, email me this information and call me if you have any questions. I need this information for research purposes.

[redacted]

**Corina Jimenez**

**To:** Corina Jimenez
**Subject:** RE: NV APRN Records Request

**From:** Nursing Board <nursingboard@nsbn.state.nv.us>
**Sent:** Monday, March 30, 2026 3:40 PM
**To:** Corina Jimenez <cjimenez@nsbn.state.nv.us>
**Subject:** FW: NV APRN Records Request

**From:** Cerna, Samantha [redacted]
**Sent:** Monday, March 30, 2026 1:49 PM
**To:** Nursing Board <nursingboard@nsbn.state.nv.us>
**Subject:** NV APRN Records Request

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Nevada State Board of Nursing,

Pursuant to the Nevada Open Records Act NRS § 239 et seq., I am requesting an opportunity to inspect or obtain copies of public records. For all advanced practice registered nurses (APRNs) licensed in the state from 2010 to present, I would like the following information:

- First Name;
- Middle Name;
- Last Name;
- Practice address;
- NPI;
- Degree that qualified the licensee for APRN licensure (e.g., MSN, DNP);
- Institution of degree that qualified the licensee for APRN licensure;
- Graduation date of degree that qualified the licensee for APRN licensure;
- Degree that qualified the licensee for RN licensure (e.g., undergraduate BSN, ADN);
- Institution of degree that qualified the licensee for RN licensure;
- Graduation date of degree that qualified the licensee for RN licensure;
- APRN license number;
- APRN license start date;
- APRN license expiration date;
- APRN license status (active, inactive);
- In-state RN license number;
- In-state RN license start date;
- In-state RN license expiration date;
- In-state RN license status (active, inactive);

- State of initial RN license;
- Start date of initial RN license;
- Disciplinary actions;
- Suspension, revoked, or other license limitation dates, if applicable

If possible, I would like this information in a comma separated variable or spreadsheet form.

I am aware licensees are available for lookup online. However, this list does not contain all of the information I am looking for. I am reaching out to obtain the more detailed information described above for each APRN. I am not seeking any protected, confidential information or personal contact information.

I believe the Board should have education information for each APRN, as completion of an approved nursing program is a requirement for licensure.

If there are any fees for searching or copying these records, please inform me if the cost will exceed $100. However, I would also like to request a waiver of all fees in that the disclosure of the requested information is in the public interest and will contribute significantly to the public's understanding of the role of APRNs in the health system. I am part of a research team at the Brown University School of Public Health seeking this information for research purposes. APRN education is a critical factor in the practice patterns of APRN in our health system. This research seeks to identify the relationship between APRN education and the care delivered by APRNs for vulnerable and underserved patients in Nevada. This information is not being sought for commercial purposes.

Please respond to this request in a reasonable time period. If access to the records I am requesting will take longer, please contact me with information about when I might expect copies or the ability to inspect the requested records.

If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

Thank you for considering my request.

Sincerely,

Samantha Cerna

--

BROWN

**Samantha Cerna '29**
*B.A. in Economics & Public Health*
[redacted]
LinkedIn
[redacted]

Email tracked with Mailsuite · Opt out

# STATE OF NEVADA-BOARD OF COSMETOLOGY

## PUBLIC RECORDS REQUEST FORM

***Please note that this form is intended for a request for records held by the Board of Cosmetology. Requests for records of Nevada state agencies must be submitted directly to the records officer for that state agency.***

| | |
|---|---|
| **Date of Request** | September 19 2026 |
| **Requestor Contact Information** | |
| Name: | Jack Grieg |
| Organization: | Self |
| Address: | [redacted] |
| City, State, Zip: | |
| Phone: | |
| E-mail: | |

**Records Requested:**

Records held by the Board of Cosmetology: ☒ Yes ☐ No

Check one: ☐ Paper copies ☒ Electronic copies ☐ Certified copies ☐ Inspection (in person)

*Please be specific and include as much detail as possible regarding the records you are requesting.*

Records relating to expenditures from January 1 2023 to present day, specifcally: contracts and their related documents (bids, rfqs, rfps, solicitation agreements, scopes of work) for outside vendors, private contractors, independent contractors, software, office supplies; monthly statements for all agency issued credit cards or purchasing cards or p-cards; itemized receipts and expense reports including copies the actual receipts, digital receipts, POs, and documents for reconciliation and personal employee reimbursement; reconciliation logs: including the reports where the employee must state the business justification for the transactions.

***To complete an estimate, the agency will need the following information:***

| | | | |
|---|---|---|---|
| ☐ I will pick up | ☐ Please FedEx<br>*Fed Ex billing number:* | ☒ Please send USPS<br>Only if necessary to be mailed | ☒ E-mail (if format allows)<br>Preferred |

**Statement**

☒ I understand there is a charge for copies of public records. I understand I will receive a written estimate for production of the records indicated above if the estimated cost is expected to be over $25.00, which I will be required to pay in full prior to inspection or reproduction. Materials will be held for 30 days.

**Requester Signature** Jack Grieg

Signature

**Office Use Only**

| **Request status:** | | **Estimate:** | |
|---|---|---|---|
| Date | | | |
| _____ | Request received | Estimate: | $ _____ |
| _____ | Receipt acknowledgement issued | Date deposit received | _____ |
| _____ | Request filled | Actual (if different): | $ _____ |
| _____ | Estimated completion | Date final payment received | _____ |
| _____ | Estimate provided | Completed by | _____ |
| _____ | Request denied in whole | | |
| _____ | Other: | *Retain request form for 90 days following completing of request. RDA 2009047* | |

**Nevada State Board of Cosmetology**
**8945 W. Russell Road #200 – Las Vegas, NV 89148**
**740 Del Monte Lane #12– Reno, NV 89511 Attention: Steven McDonald,**

**Phone: (702) 508-0015**

Outlook

**RECEIVED**
**By Nick Doyle at 9:41 am, Sep 18, 2026**

## PUBLIC RECORDS REQUEST – NEVADA WILDFIRES AND HOMEOWNERS INSURANCE

**From** LaFawndah Sampson [redacted]
**Date** Wed 9/16/2026 9:13 PM
**To** Public Records <publicrecords@doi.nv.gov>

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

I have been following Nevada's growing homeowners insurance problem, particularly the effect of wildfire risk on the availability and affordability of coverage. DOI has reported increasing wildfire-related cancellations and declinations, while Nevada homeowners in some areas have faced increasing difficulty obtaining or keeping coverage.

The 2025 Legislature considered a FAIR Plan that would have provided a backstop for homeowners unable to obtain coverage. DOI also helped develop and advance AB 376, an approach developed in consultation with the insurance industry that relied in substantial part on voluntary insurer participation, a regulatory sandbox, and alternative products that could exclude wildfire coverage. After the bill passed, no insurer participated in the sandbox. Commissioner Gaines later expressed disappointment with the lack of participation and discussed the industry's support for the program. Meanwhile, wildfire-related cancellations, nonrenewals and declinations continued to increase, and DOI acknowledged that it had not taken enforcement action.

That sequence raises questions about how DOI developed its response, what information it relied upon, what alternatives it considered, and how it evaluated whether its approach was working. I would like to understand who developed and recommended the approach, how DOI worked with the insurance industry, what the industry was asking DOI to consider, what alternatives DOI considered, and how DOI evaluated its response as the insurance-availability problem continued.

Nevada has experienced numerous significant wildfires during this period. DOI's public materials have identified, among others, the Davis, Hawk, Bug, Fred Mountain, Stallion, Oxley and Sombrero fires. These fires are examples and are not intended to limit this request. References to "wildfire," "wildfires," "wildfire-related," or DOI's "wildfire response" mean Nevada wildfires generally from January 1, 2024 through the present that resulted in or raised concerns about evacuations, residential property damage, insurance claims, insurance availability, underwriting, cancellations, nonrenewals, declinations or other homeowners insurance issues.

DOI's public response during the 2026 wildfire season included consumer guidance, assistance to affected residents and requests that insurers voluntarily provide flexibility to policyholders. I would like to understand what DOI was doing behind those public responses, including whether it was investigating the underlying insurance-availability problem, considering regulatory or enforcement action, evaluating whether earlier policy choices had worked, or considering other approaches.

**1. Please produce communications from January 1, 2024 to the present maintained by or involving DOI leadership concerning Nevada wildfires and wildfire-related homeowners**

**insurance issues. For purposes of this category, please search records maintained by Scott Kipper, Ned Gaines, Nick Stosic, Alexia Emmermann and Adam Plain.**

This includes Nevada wildfires generally during the requested period, including but not limited to the Davis, Hawk, Bug, Fred Mountain, Stallion, Oxley and Sombrero fires, where DOI discussed or considered homeowners insurance availability, cancellations, nonrenewals, declinations, underwriting, property inspections, wildfire risk, insurance claims, regulatory action, enforcement, consumer protection or the adequacy of DOI's response.

Please also include communications concerning AB 376, AB 437, the FAIR Plan, the regulatory sandbox, wildfire exclusions, wildfire deductibles or possible investigation or enforcement action.

This includes communications among the identified custodians and communications with B&I, the Governor's Office, legislators, insurers, insurance trade groups, lobbyists and other outside parties.

Please include records showing what information was provided to DOI leadership about the increasing loss of homeowners coverage, who received that information, what recommendations were made, and what DOI leadership decided to do in response.

**2. Please produce records showing DOI's development, review and handling of AB 376 and AB 437, including records maintained by the principal custodians identified in this request.**

I am looking for the development and review of the bills, proposed language and amendments, legislative strategy, testimony, fiscal notes, meetings, internal recommendations and communications with legislators or the insurance industry.

On March 31, 2025, AB 376 was presented to the Assembly Commerce and Labor Committee by Assemblymember P.K. O'Neill with Commissioner Scott Kipper and Adam Plain from DOI. During that hearing, O'Neill stated that the proposal had been developed through work with DOI and the insurance industry and used NCOIL model language.

Please include records showing who within DOI participated in developing or reviewing that approach; who proposed, recommended, supported, questioned or opposed particular provisions; who proposed or supported the regulatory sandbox, wildfire exclusions, wildfire deductibles or other alternative insurance products; what alternatives DOI considered; and what DOI understood these provisions were supposed to accomplish for homeowners who were losing or unable to obtain coverage.

Please also include records showing the role of the identified custodians in developing, reviewing, recommending, approving or communicating DOI's position on these proposals.

Please include records concerning DOI's consideration of AB 437 and the FAIR Plan, including any internal recommendation to support, oppose, remain neutral on, modify or pursue an alternative to that proposal and the reasons stated in existing records for DOI's position.

**3. Please produce communications between DOI leadership and insurers, insurance-company representatives, APCIA, NAMIC, NCOIL, lobbyists or other insurance-industry representatives concerning wildfire insurance, AB 376, AB 437, the FAIR Plan, cancellations and nonrenewals, underwriting restrictions, wildfire exclusions, wildfire deductibles or the regulatory sandbox. This search should include communications maintained by Scott Kipper, Ned Gaines, Nick Stosic, Alexia Emmermann and Adam Plain.**

I am particularly interested in communications before and during the 2025 legislative session showing what the insurance industry was asking DOI to do, who at DOI was meeting or

communicating with industry representatives, what proposals or concerns the industry presented, and whether those discussions affected DOI's legislative position.

Please also include records showing whether DOI proposed, accepted, rejected, revised or otherwise changed proposed legislation, regulations, regulatory requirements or policy positions in response to concerns or requests raised by insurers or insurance-industry representatives.

Please include meeting invitations, calendars, attendee lists, agendas, presentations, briefing materials, proposed language and follow-up communications for these meetings.

**4. Please produce records showing what happened after AB 376 became law on June 9, 2025.**

This includes DOI's efforts to obtain insurer participation in the regulatory sandbox, communications with insurers about possible products, inquiries or proposals received, and internal discussions after it became apparent that insurers were not participating.

At a February 27, 2026 legislative meeting, Commissioner Gaines stated that no insurer had filed anything under the sandbox, said he was "very disappointed," and explained that his understanding was that the insurance industry had lobbied hard for the program. He also described personally contacting industry representatives on a weekly basis trying to encourage participation.

Please include the records behind those statements, including Gaines's industry outreach, responses received, and internal DOI communications concerning why insurers were not participating, whether DOI believed the program was accomplishing its intended purpose, whether the industry had represented that it would use the program, and whether DOI considered a different approach after participation did not occur.

Please specifically include responsive records maintained by Gaines, Stosic, Emmermann, Plain and the other identified custodians, including records showing recommendations they made, information they received, actions they proposed, and any follow-up assigned to them concerning the lack of insurer participation.

Please also include existing records evaluating whether the regulatory sandbox, wildfire exclusions, wildfire deductibles or other provisions of AB 376 were helping homeowners obtain or retain coverage.

**5. Please produce records concerning DOI's consideration of investigation or enforcement as wildfire-related cancellations, nonrenewals and declinations continued to increase.**

This includes discussions of investigations, market conduct examinations, data calls, subpoenas or other information gathering, enforcement actions, fines, directives, bulletins or other regulatory options.

**Please specifically search records maintained by Ned Gaines, Nick Stosic and Alexia Emmermann for communications concerning whether DOI had sufficient evidence to investigate or take action; what additional evidence was believed necessary; whether additional data or investigation was requested; who participated in deciding whether to pursue enforcement; whether anyone recommended enforcement or additional investigation; and whether anyone recommended waiting, issuing guidance or taking another approach instead.**

Please also include records showing recommendations made by Gaines, Stosic, Emmermann or other DOI leadership concerning these issues, decisions or instructions resulting from those recommendations, and any assignments or follow-up arising from them.

This includes communications concerning the June 17, 2026 legislative hearing where DOI discussed the sharp increase in wildfire-related cancellations and declinations and Gaines acknowledged that DOI had not yet taken enforcement action.

I read a June 18, 2026 Nevada Current article reporting that wildfire-related declinations increased from approximately 2,400 in 2022 to 13,000 in 2024 and that DOI could not give legislators a firm explanation for some of the geographic increases. The article reported that Gaines said DOI was conducting "additional research" into what was driving some of the results.

I read the article here:

https://nevadacurrent.com/2026/06/18/home-insurance-being-cancelled-declined-for-wildfire-risk-in-some-surprising-places/

Please produce the records used to prepare DOI for that hearing and media response, including the underlying data, briefing materials, talking points, drafts, questions and answers, meeting records and communications identifying who participated in preparing DOI's response.

Please also produce records showing what additional research DOI conducted after the hearing, what DOI learned, who received or reviewed the results, and whether the findings caused anyone within DOI to recommend an investigation, enforcement action, additional data collection, regulatory change or different legislative approach.

**6. Please produce existing records evaluating whether DOI's response to the homeowners insurance problem was working and whether changes to that response were needed.**

This includes management records, emails, meeting notes, assignments, evaluations or recommendations concerning DOI's response to increasing wildfire-related insurance-availability problems, AB 376 and AB 437, the regulatory sandbox, continuing cancellations, nonrenewals and declinations, or DOI's enforcement response.

Please include records reflecting concerns about DOI's approach; recommendations for a different approach; requests for additional action; and changes or reassignment of responsibility.

Please also include records showing the responsibilities assigned to Kipper, Gaines, Stosic, Emmermann, Plain or other DOI personnel for legislative policy, insurer communications, data analysis, regulatory response, enforcement and consumer communications, including changes in those responsibilities during the requested period.

I am requesting existing records and am not asking DOI to create an evaluation or determine whether any employee performed adequately.

**7. Please produce DOI's internal records concerning its public, legislative and media communications about wildfire-related homeowners insurance.**

This includes communications, drafts, talking points, briefing materials, meeting invitations, calendars and assignments concerning media inquiries, legislative inquiries, public criticism, community meetings, consumer guidance or other public communications.

Please include records identifying who developed, drafted, reviewed or approved DOI's responses and the information, data and policy positions used in preparing them, including the internal preparation for the June 17, 2026 legislative hearing and related June 2026 media inquiries.

Please also include records discussing whether DOI's public messaging accurately reflected information available internally concerning cancellations, nonrenewals and declinations,

participation in the regulatory sandbox, insurer concerns or requests, DOI's enforcement options and the continuing insurance-availability problem.

**8. Please produce records concerning DOI's response to significant Nevada wildfires from January 1, 2024 through the present.**

This includes, but is not limited to, DOI's response to the Davis, Hawk, Bug, Fred Mountain, Stallion, Oxley and Sombrero fires; DOI's 2026 wildfire-season guidance; its August 11 wildfire guidance; its August 25 and August 26 consumer guidance; Bulletin 26-003; and DOI's provision of on-site insurance assistance.

Please include communications, meeting records, assignments, drafts and recommendations involving DOI leadership and the principal custodians identified in this request concerning what DOI should do in response to Nevada wildfires; whether DOI should take regulatory or enforcement action in addition to providing consumer information; whether insurers should be required or requested to take particular actions; and who developed, reviewed and approved DOI's response.

Please include records showing who recommended, developed, reviewed or approved DOI's response and any recommendation by the identified custodians for regulatory, enforcement or legislative action.

Please also include communications concerning whether Nevada's continuing wildfire activity changed DOI's assessment of homeowners insurance availability, AB 376, the regulatory sandbox, cancellations, nonrenewals, declinations, underwriting practices or the need for additional legislative, regulatory or enforcement action.

I am particularly interested in records showing whether DOI considered regulatory responses to the underlying availability, underwriting, cancellation and nonrenewal issues in addition to asking insurers voluntarily to provide flexibility following individual wildfires.

**9. Please produce communications between the principal DOI custodians identified below and Kris Sanchez, Perry Faigin, Teri Williams or other B&I Director's Office personnel concerning the subjects above.**

This includes communications in which DOI provided information, recommendations or proposed actions to B&I; B&I requested information or action from DOI; DOI sought B&I's review, approval or input; or B&I questioned, modified, approved, rejected or otherwise responded to DOI's proposed approach.

For Governor's Office communications, please include communications between DOI leadership and Governor's Office personnel concerning these subjects and records sufficient to identify the Governor's Office personnel involved and what information, recommendation, request or direction was communicated.

This request is directed only to records maintained by the Nevada Division of Insurance concerning DOI's own regulatory, enforcement, legislative, management and operational response. A separate request may be submitted to the B&I Director's Office concerning records maintained by that office. Please process this request independently, search DOI's own records, and do not refer or consolidate this request with a request submitted to B&I in place of conducting DOI's own search.

**For purposes of locating responsive records, the principal DOI custodians are Scott Kipper, Ned Gaines, Nick Stosic, Alexia Emmermann and Adam Plain. DOI should search the email, Teams messages and chats, calendars and other locations maintained for each of these custodians for the subjects identified above. Roger Hayashi is an additional custodian for the media, legislative and wildfire-response records identified in paragraphs 5, 7 and 8. Identification of these custodians is intended to assist DOI in**

**locating responsive records and does not limit the request where responsive records are maintained by other DOI personnel.**

The relevant period is January 1, 2024 through the present, and the requested records are limited to the homeowners insurance, wildfire, legislative, regulatory and enforcement subjects described above.

Responsive records include emails, Teams messages and chats, meeting invitations and calendars, memoranda, notes, presentations, reports, spreadsheets, attachments, drafts, and text messages used for state business.

If one category can be produced before the others, please produce those records on a rolling basis.

If no responsive records are found for one of these categories, please identify the custodians and locations searched. If a particular search produces an unusually large number of potentially responsive records, please identify the affected category, custodian and approximate number of results before asking me to narrow the request so that I can address the specific search issue.

If responsive records are withheld or redacted, please identify the legal basis and produce all reasonably segregable nonconfidential portions. Please provide all the public records electronically.

Sent with Proton Mail secure email.

# STATE OF NEVADA-BOARD OF COSMETOLOGY

## PUBLIC RECORDS REQUEST FORM

***Please note that this form is intended for a request for records held by the Board of Cosmetology. Requests for records of Nevada state agencies must be submitted directly to the records officer for that state agency.***

| **Date of Request** | 9/30/26 |
|---|---|
| **Requestor Contact Information** | |
| Name: | Eric Neugeboren |
| Organization: | The Nevada Indepdendent |
| Address: | [redacted] |
| City, State, Zip: | [redacted] |
| Phone: | [redacted] |
| E-mail: | [redacted] |

**Records Requested:**

Records held by the Board of Cosmetology: ☑ Yes ☐ No

Check one: ☐ Paper copies ☑ Electronic copies ☐ Certified copies ☐ Inspection (in person)

*Please be specific and include as much detail as possible regarding the records you are requesting.*

All email correspondence between members of The State Board of Cosmetology and any of the following people since July 1, 2025:

Sandra Jauregui, Steve Yeager, Nicole Cannizzaro, Skip Daly, Ira Hansen, Rochelle Nguyen, Melanie Scheible, Robin Titus, Shea Backus, Gregory Hafen II, Alexis Hansen, Howard Watts"

***To complete an estimate, the agency will need the following information:***

| | | | |
|---|---|---|---|
| ☐ I will pick up | ☐ Please FedEx *Fed Ex billing number:* | ☐ Please send USPS | ☒ E-mail (if format allows) |

**Statement**

☑ I understand there is a charge for copies of public records. I understand I will receive a written estimate for production of the records indicated above if the estimated cost is expected to be over $25.00, which I will be required to pay in full prior to inspection or reproduction. Materials will be held for 30 days.

**Requester Signature** [redacted]

Signature

**Office Use Only**

| **Request status:** | | **Estimate:** | |
|---|---|---|---|
| Date | | | |
| _____ | Request received | Estimate: | $ _____ |
| _____ | Receipt acknowledgement issued | Date deposit received | _____ |
| _____ | Request filled | Actual (if different): | $ _____ |
| _____ | Estimated completion | Date final payment received | _____ |
| _____ | Estimate provided | Completed by | _____ |
| _____ | Request denied in whole | | |
| _____ | Other: | *Retain request form for 90 days following completing of request. RDA 2009047* | |

**Nevada State Board of Cosmetology**
**8945 W. Russell Road #200 – Las Vegas, NV 89148**
**740 Del Monte Lane #12– Reno, NV 89511 Attention: Steven McDonald,**

**Phone: (702) 508-0015**

# STATE OF NEVADA-BOARD OF COSMETOLOGY

## PUBLIC RECORDS REQUEST FORM

***Please note that this form is intended for a request for records held by the Board of Cosmetology. Requests for records of Nevada state agencies must be submitted directly to the records officer for that state agency.***

| **Date of Request** | 9/30/26 |
|---|---|
| **Requestor Contact Information** | |
| Name: | Eric Neugeboren |
| Organization: | The Nevada Independent |
| Address: | [redacted] |
| City, State, Zip: | [redacted] |
| Phone: | [redacted] |
| E-mail: | [redacted] |

**Records Requested:**

Records held by the Board of Cosmetology: ☑ Yes ☐ No

Check one: ☐ Paper copies ☑ Electronic copies ☐ Certified copies ☐ Inspection (in person)

*Please be specific and include as much detail as possible regarding the records you are requesting.*

All emails to and from members of The State Board of Cosmetology since July 1, 2025, with the phrase "R074-25"

***To complete an estimate, the agency will need the following information:***

| | | | |
|---|---|---|---|
| ☐ I will pick up | ☐ Please FedEx<br>*Fed Ex billing number:* | ☐ Please send USPS | ☒ E-mail (if format allows) |

**Statement**

☑ I understand there is a charge for copies of public records. I understand I will receive a written estimate for production of the records indicated above if the estimated cost is expected to be over $25.00, which I will be required to pay in full prior to inspection or reproduction. Materials will be held for 30 days.

**Requester Signature** [redacted]

Signature

**Office Use Only**

| **Request status:** | | **Estimate:** | |
|---|---|---|---|
| Date | | | |
| _____ | Request received | Estimate: | $ _____ |
| _____ | Receipt acknowledgement issued | Date deposit received | _____ |
| _____ | Request filled | Actual (if different): | $ _____ |
| _____ | Estimated completion | Date final payment received | _____ |
| _____ | Estimate provided | Completed by | _____ |
| _____ | Request denied in whole | | |
| _____ | Other: | *Retain request form for 90 days following completing of request.* | |
| | | *RDA 2009047* | |

**Nevada State Board of Cosmetology**
**8945 W. Russell Road #200 – Las Vegas, NV 89148**
**740 Del Monte Lane #12– Reno, NV 89511 Attention: Steven McDonald,**

**Phone: (702) 508-0015**

August 12, 2026

**BY ELECTRONIC SUBMISSION**

Nevada Gaming Control Board
Attn: Custodian of Records
Public Records Request
1919 College Parkway
Carson City, NV 89702

Re: Public Records Request

Dear Whomever it May Concern:

We write to you today to request the following records pursuant to Nevada's Revised Statutes, Chapter 239 (Public Records):

- All electronic and written correspondence and other forms of communication, inclusive of emails, written letters, and memoranda, dated January 2025 to present between Mike Dreitzer, Chairman of the Nevada Gaming Control Board ("NGCB"); George Assad, NGCB member; and/or Chandeni Sendall, NGCB member and any official or employee of the Commodity Futures Trading Commission ("CFTC") or the Federal Trade Commission ("FTC").

- All electronic and written correspondence and other forms of communication, inclusive of emails, written letters, and memoranda, dated January 2025 to present between Mike Dreitzer, Chairman of the NGCB; George Assad, NGCB member; and/or Chandeni Sendall, NGCB member and Nevada Congresswoman Dina Titus and/or members of Representative Titus' staff.

- All electronic and written correspondence and other forms of communication, inclusive of emails, written letters, and memoranda, dated January 2025 to present between Mike Dreitzer, Chairman of the NGCB; George Assad, NGCB member; and/or Chandeni Sendall, NGCB member and Nevada Senator

Catherine Cotez Masto, Nevada Senator Jacky Rosen, and/or member of either Senator's staff.

- All electronic and written correspondence and other forms of communication, inclusive of emails, written letters, and memoranda, dated January 2025 to present between Mike Dreitzer, Chairman of the NGCB; George Assad, NGCB member; and/or Chandeni Sendall, NGCB member and any individual or entity containing the phrases "prediction market," "prediction markets," "illegal gaming operator," "illegal gaming operators," "event contracts," "event contract," "unlicensed gaming operator," "unlicensed gaming operators," "illegal operations."

- All electronic and written correspondence and other forms of communication, inclusive of emails, written letters, and memoranda, dated January 2025 to present between Mike Dreitzer, Chairman of the NGCB; George Asssad, NGCB member; and/or Chandeni Sendall, NGCB member and any individual or entity containing the phrases "Blockratize, Inc.," "Blockratize," "Polymarket," "Coinbase Financial Markets, Inc.," "Coinbase," "KalshiEX, LLC" and/or "Kalshi."

- All electronic and written correspondence and other forms of communication, inclusive of emails, written letters, and memoranda, dated January 2025 to present between Mike Dreitzer, Chairman of the NGCB; George Assad, NGCB member; and/or Chandeni Sendall, NGCB member and any individual or entity concerning Senate Bill 256 ("SB256").

- All electronic and written correspondence and other forms of communication, inclusive of emails, written letters, and memoranda, dated January 2025 to present present between any members of the NGBC's staff, including but not limited to Mike Dreitzer, Chairman of the NGCB; George Asssad, NGCB member; and/or Chandeni Sendall, and representatives of the following organizations:
    - American Gaming Association;
    - National Conference of State Legislatures;
    - Indian Gaming Association;
    - National Congress of American Indians;
    - Better Markets; and/or
    - Sports Betting Alliance.

- All meeting minutes or notes from phone calls or meetings occurring between January 2025 and present between any members of the NGBC's staff, including but not limited to Mike Dreitzer, Chairman of the NGCB; George Asssad, NGCB member; and/or Chandeni Sendall, and representatives of the following organizations:
    - American Gaming Association;
    - National Conference of State Legislatures;
    - Indian Gaming Association;
    - National Congress of American Indians;
    - Better Markets; and/or
    - Sports Betting Alliance.

- The calendars of the following NGCB officials from January 2025 to present:
    - Mike Dreitzer, Chairman of the NGCB;
    - George Asssad, NGCB member; and
    - Chandeni Sendall

We are willing to pay all required fees incurred in providing the requested information. Should you anticipate the fees associated with this request exceeding $500, please contact me for prior approval before incurring costs.

Thank you for your prompt attention to this matter. Should you have any questions, please do not hesitate to contact me at [redacted]

| | |
|---|---|
| **From:** | Purchasing Records Requests |
| **To:** | AGGeneralCounsel |
| **Cc:** | Purchasing Records Requests |
| **Subject:** | Survey of Government Entities re: Public Records |
| **Date:** | Monday, September 28, 2026 8:46:12 AM |
| **Attachments:** | image001.png |

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Good morning,

Please see the below example of an overbroad PRR, and our response. We get many of these types of requests and provide searching instructions for them to pull the data from Epro themselves.

However, as the Procurement system is moving to CoreNV in 2027, we will be losing access to Epro and will have to determine a new method for fulfilling these types of PRR's. We don't know what that will look like yet, as processes are still being created. We think that a software solution may be the answer, but we are just starting to look at possibilities.

Also, here is our fee schedule, which is on our website.

# Public Records Requests

**Fees for Public Records**

Per NRS 239.052, a government entity is permitted to charge a fee for the actual cost incurred in the provision of a public record. This includes, without limitation, the cost of ink, toner, paper, media, and postage.
Pursuant to NRS 239.052(2), the Purchasing Division chooses to waive this fee except for the following exceptions:

- Hard copy requests of 50 or more single pages
- Postage costs
- The media used to provide electronic records (e.g., thumb drive, discs)

The Division will inform the requestor of any fees prior to responding to the request.

**Fees List :**

- Black and white copies, up to 8.5" x 11": $0.05 per page
- Color, up to 8.5" x 11": $0.50 per page
- Compact Disc/DVD/Thumb Drive: $5.00 per device

Electronic versions (.pdf) could be too large to be emailed so other means of delivery can be discussed. The Department PIO will reach out to the requestor if the materials are too large to email.

Submit public records requests here.

- purchasingrecords@admin.nv.gov

Thank you!

Heather Chavez | Administrative Assistant III
State of Nevada | Purchasing Division
515 E. Musser St., Ste 300 | Carson City, NV 89701
W (775) 531-3308
hchavez@admin.nv.gov |nevadaepro.com | purchasing.nv.gov

We would greatly appreciate your feedback about the customer service you received. Click here to complete a customer service survey.

Unified to provide Efficient, Transparent, and Value-Driven Procurement.

**PUBLIC RECORDS NOTICE: In accordance with NRS Chapter 239, this email and responses, unless otherwise made confidential by law, may be subject to Nevada Public Records laws and may be disclosed to the public upon request. **

-----Original Message-----
From: Purchasing Records Requests <PurchasingRecords@admin.nv.gov>
Sent: Thursday, July 30, 2026 2:07 PM
To: Nicole Ramsey [redacted]
Cc: Purchasing Records Requests <PurchasingRecords@admin.nv.gov>; Lino Jasso <LJasso@admin.nv.gov>
Subject: RE: FOIA Request - Hearings and Appeals

Good afternoon,

You requested records for multiple vendors. The instructions below will provide the means to search for any vendors you want using our procurement system.

The solicitation, vendor proposals, evaluation scoring, and resultant contracts requested are already publicly available via NevadaEPro. https://NevadaEPro.com. Do not log in! Using the advanced search at the top, enter the bid number and press the magnifying glass to search. The resulting page will show the bid number and each of the contract numbers as clickable links—each one houses the documents associated with that Bid Solicitation or Contract/Blanket Purchase Order. After clicking through to the Bid Solicitation document, scroll to the bottom of the page to locate the Bid Tab button. That button will lead to the page with various tabs where each vendor proposal, award information, and scoring is located. Click a proposal number to see details about the proposal and download the vendor documents. If after reviewing the public documents in NevadaEPro, there is something else you need, please contact PurchasingRecords@admin.nv.gov.

Vendors are also already publicly available via NevadaEPro. https://NevadaEPro.com.

To see the Vendors:
1. Go to https://NevadaEPro.com (not logged in)
2. Click the blue word Advanced in the page header
3. From the lower Document Type dropdown, choose Vendors
4. Enter your search criteria (such as Vendor Name)
5. Click the blue Search button
6. The results will be displayed
7. From the search results, the user can export the list to CSV, XLS, or PDF in the top right corner
8. Click on the Vendor ID
9. Click on the Contracts tab. This will display all current contracts with that vendor
10. From the main Epro page, you can search for any contracts by the contract number you just received in the Vendor Profile, by choosing Contract from the dropdown rather than Vendor, and putting in the contract number

Purchase orders are already publicly available via NevadaEPro. https://NevadaEPro.com. You requested information for Purchase Orders for a specific vendor for a specific time period.

To see the Purchase Orders issued for specific dates:
1. Go to https://NevadaEPro.com (not logged in)
2. Click the blue word Advanced in the page header
3. From the lower Document Type dropdown, choose Purchase Orders
4. https://nevadaepro.com/bso/view/search/external/advancedSearchPurchaseOrder.xhtml
5. In the Vendor Name field, type in the Vendor you are searching for
6. In the Sent Date From field, enter the date you want
7. In the Sent Date To, enter the date you want
8. Click the blue Search button
9. The results will be displayed
10. You can export these results by clicking one of the icons in the upper right side of the search results (CSV, Excel, or Adobe)

However, orders from a contract are officially the custody of the issuing using agency, and there are some agencies that do not use NevadaEPro, so you may want to contact individual using agencies as well.

Also, the State of Nevada has another tool you may be interested in. This is where you can download spend to various vendors. https://checkbook.nv.gov/. This site is administered by the Controller's Office, so any questions regarding its use can be addressed to them: https://controller.nv.gov/Contact/ContactUs/

We now consider this request closed.

Respectfully,

Public Records
State of Nevada | Purchasing Division
515 E. Musser St., Ste 300 | Carson City, NV 89701 W (775) 531-3308
PurchasingRecords@admin.nv.gov |nevadaepro.com | purchasing.nv.gov

We would greatly appreciate your feedback about the customer service you received.
Click here to complete a customer service survey.

Unified to provide Efficient, Transparent, and Value-Driven Procurement.

**PUBLIC RECORDS NOTICE: In accordance with NRS Chapter 239, this email and

responses, unless otherwise made confidential by law, may be subject to Nevada Public Records laws and may be disclosed to the public upon request. **

-----Original Message-----
From: Lino Jasso <LJasso@admin.nv.gov>
Sent: Thursday, July 30, 2026 2:04 PM
To: Purchasing Records Requests <PurchasingRecords@admin.nv.gov>
Subject: FW: FOIA Request - Hearings and Appeals

Hi,

The email below was received yesterday.

Lino Jasso| Hearings Division
2200 S. Rancho Drive, Suite 220
Las Vegas, Nevada 89102
T: (702)-486-3409: ljasso@admin.nv.gov
File online with our Court: eFlex

-----Original Message-----
From: Nicole Ramsey [redacted]
Sent: Wednesday, July 29, 2026 10:36 AM
To: Lino Jasso <LJasso@admin.nv.gov>
Subject: FOIA Request - Hearings and Appeals

You don't often get email from [redacted] Learn why this is important <https://aka.ms/LearnAboutSenderIdentification>

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Records Custodian,

The Data Branch is submitting a public records request for records pertaining to vendor procurement and purchasing activity.

Pursuant to Nevada's Public Records Act (NRS Chapter 239)

Scope of Request:

All products from: eScribers, For the Record, JAVS, Stenograph, and VIQ Solutions

We are looking for records from 2022 to now that capture the pricing details of any

engagement, which may include (where applicable) subscription terms, licensing fees, per-unit costs, and implementation charges.

Relevant records may include:

* Contracts, service agreements, and order forms
* Purchase orders involving the above vendors
* RFP or solicitation documents
* Task orders issued under cooperative purchasing agreements

To make fulfillment as easy as possible, we are willing to receive records in whatever format is most convenient, including:

* Spreadsheet exports (preferred)
* PDF or Word documents
* Standard ERP or finance system reports
* Any summary-level purchasing records your office already keeps on hand

To the extent any portion of the requested records is exempt from disclosure, we ask that the remaining non-exempt segregable portions be released.

For full transparency, this request is for commercial purposes. We will gladly adhere to any policies or procedures Hearings and Appeals has in place for public records requests, and are open to narrowing, clarifying, or modifying the request to make fulfillment easier on your end.

Records may be sent directly to Nicole Ramsey at the following:

Email: [redacted]

Phone: [redacted]

Address: [redacted]

We appreciate your help and look forward to a prompt response. If this request belongs with another agency or department, please forward it to the appropriate custodian or let us know. Thank you for your cooperation.

Best regards,

Nicole Ramsey

The Data Branch

Where these records go: The Data Branch is building a national reference of public purchasing records gathered from public sources across the country. When it launches at thedatabranch.com <https://thedatabranch.com/> , the app will help public agencies compare what peer agencies paid for similar products and services.

Records from your agency will contribute to this shared resource. Please feel free to share it with your purchasing or finance team.

INTERNAL REF: c7537935-225d-4350-a4a7-ee277c01ac7b

<https://app.frontapp.com/api/1/noauth/companies/dec7b537a4e036884cc9/seen/msg_2y8p9axn/han_9tn5jff/de992ce5.gif>

**From:** Ashvik Katikireddy
**To:** State Treasurer
**Cc:** [redacted]
**Subject:** Public records request — collateral pool records for public deposits (NRS Chapter 356)
**Date:** Wednesday, August 26, 2026 2:43:47 PM

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**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Public Records Officer,

Pursuant to the Nevada Public Records Act, NRS Chapter 239, I request copies of the following public records maintained by the Office of the State Treasurer in connection with the collateralization of public deposits under NRS Chapter 356 (including the collateral pool program under NRS 356.350 to 356.390 and NAC 356.100 to 356.140):

The daily reports submitted by depositories of the total balance of public money held in the accounts of public depositors participating in the collateral pool, for all depositories and all available periods.

The weekly summary reports submitted by depositories of the total fair market value of securities maintained at a third-party depository for the benefit of the State Treasurer as collateral, for all depositories and all available periods.

The security-level detail of collateral pledged for the benefit of the State Treasurer, for each depository and period: security description and type, CUSIP number, par value, fair market value, the third-party depository or custodian holding the securities, and any Federal Home Loan Bank irrevocable letters of credit pledged in lieu of securities.

Any summary or aggregate tabulations the Office maintains of public deposits and pledged collateral by depository over time, including collateral-monitoring, assessment, or compliance records under NRS 356.360 to 356.380.

Please also provide blank copies of the current and historical reporting forms, collateral pool agreements, and instructions used by depositories for reporting and pledging collateral, so I can interpret the fields correctly.

I request the records in machine-readable electronic form (CSV, Excel, or a database export) where they exist in that form, delivered by email or download link. I am happy to receive the electronically maintained portion of the history first if older records exist only on paper.

If any portion of these records is confidential under NRS 239 or another statute, please release the non-confidential portions and cite the specific provision for anything withheld. If fees will exceed $50, please contact me with an estimate before proceeding; if the request as framed is burdensome, I welcome a call to narrow it (my priority is the depository-level pledged-collateral records with CUSIP detail).

This request is for academic research on public deposit programs and bank lending. Thank you for your assistance.

Sincerely,
Ashvik Katikireddy
[redacted]

**From:** Everett Sloan
**To:** State Treasurer
**Subject:** FOIA Request - Nevada Capital Investment Corporation (NCIC)- Silver State Opportunities Fund
**Date:** Thursday, July 30, 2026 9:59:00 AM

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**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello,

The Data Branch is writing to submit a public records request regarding vendor procurement records.

Pursuant to Nevada's Public Records Act (NRS Chapter 239)

**Scope of Request:**

All products from: eScribers, For the Record, JAVS, Stenograph, and VIQ Solutions

We are looking for records from 2022 to now that capture the pricing details of any engagement, which may include (where applicable) subscription terms, licensing fees, per-unit costs, and implementation charges.

Specifically, we are seeking:

- Contracts, service agreements, or order forms
- Purchase orders tied to the listed vendors
- RFP or solicitation documents
- Task orders issued against cooperative purchasing agreements

We are flexible on format and can accept records in whichever way your office already keeps them, such as:

- Spreadsheet exports (preferred)
- PDF or Word documents
- Standard ERP or finance system reports
- Any existing summary-level purchasing records your office already maintains

Where portions of the requested records may be withheld under an applicable exemption, we ask that all reasonably segregable non-exempt portions still be produced.

This request *is* for commercial purposes. We are happy to comply with all applicable policies and procedures Nevada Capital Investment Corporation (NCIC)- Silver State Opportunities Fund has in place to handle FOIA requests, and are willing to narrow down, clarify, or adjust the request to make fulfillment easier for your office.

Please direct responsive records to The Data Branch at the following contact:

Everett Sloan

Email: [redacted]

Phone: [redacted]

Address: [redacted]

We look forward to your timely response and appreciate your attention to this request. Should it have been directed to the wrong agency or department, please advise or pass it along to the appropriate custodian. Thank you for your cooperation.

Sincerely,

Everett Sloan

The Data Branch Research Team

**Where these records go:** The Data Branch is building a national reference of public purchasing records gathered from public sources across the country. When it launches at thedatabranch.com, the app will help public agencies compare what peer agencies paid for similar products and services. Records from your agency will contribute to this shared resource. Please feel free to share it with your purchasing or finance team.

**From:** State Treasurer
**To:** Kirsten Van Ry
**Subject:** FW: Public records request (NRS ch. 239) — reports required by NRS 356.360(4)
**Date:** Tuesday, August 25, 2026 3:35:31 PM
**Attachments:** ~WRD0000.jpg

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**From:** Sungho Park [redacted]
**Sent:** Tuesday, August 25, 2026 12:27 PM
**To:** State Treasurer <StateTreasurer@nevadatreasurer.gov>
**Subject:** Public records request (NRS ch. 239) — reports required by NRS 356.360(4)

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Records Custodian,

Pursuant to the Nevada Public Records Act, NRS chapter 239, I request copies of the following records maintained by the Office of the State Treasurer in connection with the collateral pool for public deposits under NRS chapter 356.

I have already collected the Daily Depository Reports published through the Office's public reports portal for 2005 to the present, so I am not asking the Office to reproduce those. This request is directed at the reports the statute requires that are not published there.

1. The monthly third-party custodian securities reports required by NRS 356.360(4)(b), for all depositories and all available periods. That subsection requires the State Treasurer to "[d]irect any third-party depository that holds acceptable securities on behalf of the depository to submit a monthly report to the State Treasurer setting forth a list of those securities." I am requesting the records that requirement produces: for each security, the CUSIP number, description, par or face value, market value, maturity date, and the custodian holding it, by depository and month.

2. The monthly account reports required by NRS 356.360(4)(a) — "a monthly report setting forth a list of accounts at the depository that hold public money" — for all depositories and all available periods, including the public entity holding each account and the balances reported.

3. The daily reports of total public money required by NRS 356.360(4)(a), as a machine-

readable extract, for any period before 2005 that is not available through the public portal, and for any period where the portal record is incomplete.

4. The annual financial statements submitted by depositories under NRS 356.360(4)(a), or an index identifying which were filed and when.

5. Blank copies of the current and historical versions of the reporting forms, file specifications, or system layouts used for items 1 through 4, so that I can interpret the fields correctly.

6. A list of financial institutions that have participated in the collateral pool over time, with entry and exit dates, and a list of those securing public deposits outside the pool under NRS 356.133 where the Office maintains one.

On confidentiality. Chapter 356 contains no provision making these reports confidential. Under NRS 239.010, public books and records are open to inspection unless declared confidential by law, and the burden of establishing confidentiality rests with the governmental entity. If the Office administers a practice of distributing these particular reports only to public depositors and depositories, I note that an internal distribution practice is not itself a statutory exemption. Should the Office withhold any portion, I ask that it identify the specific statute making that information confidential, and release all non-exempt portions, including redacted versions where only part of a record is claimed to be exempt.

Time period. I am requesting these records for all available periods, beginning in 1970 or at the program's inception, whichever is later. I recognize that older records may exist only on paper, microfilm, or in a legacy system. Where that is the case, please (a) state the program's inception date and the earliest period for which records still exist, (b) identify the records retention schedule that governs these records and whether any have been destroyed or transferred to the State Archives or another repository, and (c) provide the electronically maintained portion first. I am glad to receive the history in installments, and a partial history is far more useful to me than none.

I request the records in machine-readable electronic form (CSV, Excel, or a database export) where they exist in that form, delivered by email or download link. If fees will exceed $50, please contact me with an estimate before proceeding. If the request as framed is unduly burdensome, I welcome a conversation to narrow it; my priority is item 1, followed by item 2.

This request is for academic research on public deposit programs and bank lending.
Thank you for your assistance.

Sincerely,
Sungho Park

[redacted]



Chelsea Meggerson <chelsea.meggerson@unlv.edu>

# Purchasing Public Records Request PRR-2025-407

6 messages

**Jamilah McGrue** <jamilah.mcgrue@unlv.edu> Mon, Nov 10, 2025 at 4:32 PM
To: Chelsea Meggerson <chelsea.meggerson@unlv.edu>

Chelsea,

We received a public records request from Justin Wenig with Starjump for vendor agreements. I can tell you that UNR received the same request. Let me know if you think other departments may have responsive records, and I will contact them directly.

> **All contracts (and/or Master Service Agreements with all associated purchase orders) that are in effect or have been in effect in the last 3 years with any of the following vendors with which you have a relationship:**
>
> **- CampusCE, Intrinsik Enrole, Canvas Catalog, Ellucian Elevate, Hannon Hill, Terminalfour**
>
> **I am requesting existing, already maintained electronic records (without copying, scanning, or printing).**

The deadline is Monday, Nov. 16. Let me know if you have any questions.

---

**Jamilah McGrue**
**(pronounced: Juh-Mill-luh)**
*Public Affairs Coordinator*
Office of Public Affairs
University of Nevada, Las Vegas
**Pronouns: She/Her/Hers**
*"You don't have to be 'one of' to stand with."*

jamilah.mcgrue@unlv.edu
Office: 702-895-5895

unlv.edu • Twitter • Facebook • Instagram • YouTube

***Working remotely on Mondays and Fridays****

*PUBLIC RECORDS NOTICE: In accordance with NRS 239.010, this email and responses, unless otherwise made confidential by law, may be subject to Nevada Public Records laws and may be disclosed to the public upon request.*

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**Chelsea Meggerson** <chelsea.meggerson@unlv.edu> Wed, Nov 12, 2025 at 11:10 AM
To: Rhonda Dale <rhonda.dale@unlv.edu>

Hi Rhonda - is this PRR something you can assist me with? Or if there is a buyer who can? Deadline is 11/16.

**Chelsea Meggerson**
Executive Director
Purchasing and Contracts
University of Nevada, Las Vegas

chelsea.meggerson@unlv.edu
Office: 702-895-5508

[Quoted text hidden]

---

**Rhonda Dale** <rhonda.dale@unlv.edu> Wed, Nov 12, 2025 at 11:15 AM
To: Chelsea Meggerson <chelsea.meggerson@unlv.edu>

Yes, I will start on it this afternoon.

**Rhonda Dale**
Interim Assistant Director
Purchasing & Contracts
Business Affairs

University of Nevada, Las Vegas

rhonda.dale@unlv.edu
Office: 702-895-1578
[Quoted text hidden]

[Quoted text hidden]

---

**Rhonda Dale** <rhonda.dale@unlv.edu> Wed, Nov 12, 2025 at 3:16 PM
To: Chelsea Meggerson <chelsea.meggerson@unlv.edu>

I found no records for any of these suppliers except for NSU (Campus CE). Do they have their own requests? Canvas Catalog is sold by Instructure and I didn't see that listed on any of those POs. Let me know if I can assist further.

**Rhonda Dale**
Interim Assistant Director
Purchasing & Contracts
Business Affairs
University of Nevada, Las Vegas

rhonda.dale@unlv.edu
Office: 702-895-1578

unlv.edu • Twitter • Facebook • Instagram • YouTube

On Wed, Nov 12, 2025 at 11:11 AM Chelsea Meggerson <chelsea.meggerson@unlv.edu> wrote:
[Quoted text hidden]

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**Chelsea Meggerson** <chelsea.meggerson@unlv.edu> Wed, Nov 12, 2025 at 3:46 PM
To: Jamilah McGrue <jamilah.mcgrue@unlv.edu>
Cc: Rhonda Dale <rhonda.dale@unlv.edu>

HI Jamilah,

Rhonda reviewed and did not identify any responsive records for this request.

Thank you,

Chelsea

**Chelsea Meggerson**
Executive Director
Purchasing and Contracts
University of Nevada, Las Vegas

chelsea.meggerson@unlv.edu
Office: 702-895-5508

[Quoted text hidden]

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**Jamilah McGrue** <jamilah.mcgrue@unlv.edu> Thu, Nov 13, 2025 at 8:50 AM
To: Chelsea Meggerson <chelsea.meggerson@unlv.edu>
Cc: Rhonda Dale <rhonda.dale@unlv.edu>

Thank you both!
---
*"You don't have to be 'one of' to stand with."*
***Jamilah McGrue***
**(pronounced: Juh-mill-luh)**
Office: (702) 895-5895
***Working remotely on Mondays and Fridays***

*PUBLIC RECORDS NOTICE: In accordance with NRS 239.010, this email and responses, unless otherwise made confidential by law, may be subject to Nevada Public Records laws and may be disclosed to the public upon request.*

[Quoted text hidden]

Chelsea Meggerson <chelsea.meggerson@unlv.edu>

# Purchasing Public Records Request PRR-2026-28

7 messages

**Jamilah McGrue** <jamilah.mcgrue@unlv.edu> Thu, Jan 22, 2026 at 4:32 PM
To: Chelsea Meggerson <chelsea.meggerson@unlv.edu>

Hi Chelsea,

We received another public records request from Justin Wenig with Starbridge for vendor agreements. Let me know if you think other departments may have responsive records, and I will contact them directly.

> **All contracts (and/or Master Service Agreements with all associated purchase orders) that are in effect or have been in effect in the last 3 years with any of the following vendors with which University Of Nevada Las Vegas have a relationship:**
>
> **- Genius SIS (Genius CE), Lounge, Ready Education (Campus Groups), Suitable**
>
> **I am requesting existing, already maintained electronic records (without copying, scanning, or printing).**

The deadline is Thursday, Jan. 29. Let me know if you have any questions.

---

**Jamilah McGrue**
**(pronounced: Juh-Mill-luh)**
*Public Affairs Coordinator*
Office of Public Affairs
University of Nevada, Las Vegas
**Pronouns: She/Her/Hers**
***"You don't have to be 'one of' to stand with."***

jamilah.mcgrue@unlv.edu
Office: 702-895-5895

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***Working remotely on Mondays and Fridays****

*PUBLIC RECORDS NOTICE: In accordance with NRS 239.010, this email and responses, unless otherwise made confidential by law, may be subject to Nevada Public Records laws and may be disclosed to the public upon request.*

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**Chelsea Meggerson** <chelsea.meggerson@unlv.edu> Fri, Jan 23, 2026 at 1:03 PM
To: Deanna Calderon <deanna.calderon@unlv.edu>
Cc: Rhonda Dale <rhonda.dale@unlv.edu>

Hi Deanna,

Would you mind assisting with another PRR? Similar to previous ones we received, and the deadline is next Thursday 1/29. We have so many requests inbound so I can request an extension if needed.

Thank you!

Chelsea

**Chelsea Meggerson**
Executive Director
Purchasing and Contracts
University of Nevada, Las Vegas

chelsea.meggerson@unlv.edu
Office: 702-895-5508

[Quoted text hidden]

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**Deanna Calderon** <deanna.calderon@unlv.edu> Fri, Jan 23, 2026 at 2:26 PM
To: Chelsea Meggerson <chelsea.meggerson@unlv.edu>
Cc: Rhonda Dale <rhonda.dale@unlv.edu>

Hi Chelsea,

Yes, I will get started on this and will aim for Monday EOD completion. If this changes, I will be sure to let you know.

Best Regards,

**Deanna Calderon**
Purchasing Analyst
Purchasing and Contracts
University of Nevada, Las Vegas

deanna.calderon@unlv.edu
Office: 702-895-2561

unlv.edu • Twitter • Facebook • Instagram • YouTube

*Top 3 percent nationally in research activity.*

[Quoted text hidden]

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**Deanna Calderon** <deanna.calderon@unlv.edu> Mon, Jan 26, 2026 at 10:17 AM
To: Chelsea Meggerson <chelsea.meggerson@unlv.edu>, Rhonda Dale <rhonda.dale@unlv.edu>

Hi Chelsea,

Below is a draft email for Jamilah. Please let me know your comments and/or feedback:

Purchasing performed a review of PRR-2026-28 and there were no contract or purchase order records found.

Please reference the below grid for the review details.

*Public Records Request PRR-2026-28, any contract and/or PO record from 01/22/2023 to current*

| Suppliers | In SREG (SUP) | Contract Records | Purchase Order Records | Notes |
|---|---|---|---|---|
| Genius SIS (Genius CE) | Pending | None | None | SREG: Supplier in Phase 2 Approval of registration. |
| Lounge | No | None | None | |
| Ready Education (Campus Groups) | SUP-00069565 | None | None | SREG Name: Ready Education (Canada) Inc. |
| Ready Education (Campus Groups) | SUP-00078182 | None | None | SREG Name: Ready Education Holdings Inc. |
| Suitable | SUP-00046794 | None | None | SREG Name: Suitable Technologies, Inc. |
| Suitable | SUP-00006650 | None | None | SREG Name: James A Martone dba Suitable Group, LLC |

Best Regards,

**Deanna Calderon**
Purchasing Analyst
Purchasing and Contracts
University of Nevada, Las Vegas

deanna.calderon@unlv.edu
Office: 702-895-2561

unlv.edu • Twitter • Facebook • Instagram • YouTube

*Top 3 percent nationally in research activity.*

[Quoted text hidden]

---

**Chelsea Meggerson** <chelsea.meggerson@unlv.edu> Mon, Jan 26, 2026 at 12:02 PM
To: Deanna Calderon <deanna.calderon@unlv.edu>
Cc: Rhonda Dale <rhonda.dale@unlv.edu>

Thank you. This looks great and I always appreciate your attention to detail! Please proceed with responding to Jamilah

**Chelsea Meggerson**
Executive Director
Purchasing and Contracts
University of Nevada, Las Vegas

chelsea.meggerson@unlv.edu
Office: 702-895-5508

[Quoted text hidden]

---

**Deanna Calderon** <deanna.calderon@unlv.edu> Mon, Jan 26, 2026 at 1:28 PM
To: Jamilah McGrue <jamilah.mcgrue@unlv.edu>
Cc: Chelsea Meggerson <chelsea.meggerson@unlv.edu>, Rhonda Dale <rhonda.dale@unlv.edu>

Hello Jamilah,

Purchasing performed a review of PRR-2026-28 and there were no contract or purchase order records found.

Please reference the below grid for the review details.

*Public Records Request PRR-2026-28, any contract and/or PO record from 01/22/2023 to current*

| Suppliers | In SREG (SUP) | Contract Records | Purchase Order Records | Notes |
|---|---|---|---|---|
| Genius SIS (Genius CE) | Pending | None | None | SREG: Supplier in Phase 2 Approval of registration. |
| Lounge | No | None | None | |
| Ready Education (Campus Groups) | SUP-00069565 | None | None | SREG Name: Ready Education (Canada) Inc. |
| Ready Education (Campus Groups) | SUP-00078182 | None | None | SREG Name: Ready Education Holdings Inc. |
| Suitable | SUP-00046794 | None | None | SREG Name: Suitable Technologies, Inc. |
| Suitable | SUP-00006650 | None | None | SREG Name: James A Martone dba Suitable Group, LLC |

Best Regards,

**Deanna Calderon**
Purchasing Analyst
Purchasing and Contracts
University of Nevada, Las Vegas

deanna.calderon@unlv.edu
Office: 702-895-2561

unlv.edu • Twitter • Facebook • Instagram • YouTube

*Top 3 percent nationally in research activity.*

On Fri, Jan 23, 2026 at 1:03 PM Chelsea Meggerson <chelsea.meggerson@unlv.edu> wrote:
[Quoted text hidden]

---

**Jamilah McGrue** <jamilah.mcgrue@unlv.edu> Mon, Jan 26, 2026 at 5:14 PM
To: Deanna Calderon <deanna.calderon@unlv.edu>
Cc: Chelsea Meggerson <chelsea.meggerson@unlv.edu>, Rhonda Dale <rhonda.dale@unlv.edu>

Thank you Deanna!

---

*"You don't have to be 'one of' to stand with."*
***Jamilah McGrue***
**(pronounced: Juh-mill-luh)**
Office: (702) 895-5895
***Working remotely on Mondays and Fridays***

*PUBLIC RECORDS NOTICE: In accordance with NRS 239.010, this email and responses, unless otherwise made confidential by law, may be subject to Nevada Public Records laws and may be disclosed to the public upon request.*

[Quoted text hidden]

# Request Information

| | |
|---|---|
| **Print Requested By:** | JamilahMcGrue |
| **Date Printed:** | 10/07/2026 |

| | |
|---|---|
| **Request Number:** | PRR-2026-261 |
| **Date of Request:** | 08/02/2026 12:00 AM |
| **Request Type:** | Public Records Request |
| **Request Status:** | Pending - Legal Review |
| **Public Request:** | No |

# Request Details

**Request Fields**

| | |
|---|---|
| **Preferred Method of Communication** | |
| ***(How should we reach you with questions or updates about your request?)*** | Email |
| **Name of Requester** | Antonio Gilkey |
| **Requester Phone** | |
| **Requester Email** | [redacted] |
| **Are you a member of the media?** | NoMediaRequester |
| **Company Affiliation or website** | Gridiron Playbook |
| **I am Requesting Student Directory Information** | No |
| **I am Requesting Athletics Non-Conference Game Agreements** | No |
| **I am Requesting Athletics Head Coach Contracts** | No |
| **I am Requesting Athletics Department Contracts/Records** | Yes |
| **I am Requesting NCAA Reports** | No |

| | |
|---|---|
| **I am Requesting Employee Directory (non-salary) Information** | No |
| **I am Requesting Employee Salary / Compensation** | No |
| **I am Requesting University Documents / Reports / Records** | No |
| **I am Requesting University Purchasing / Contracts** | No |
| **I am Requesting RFP's / Proposals / Bids** | No |
| **I am Requesting Police Records** | No |
| **I am Requesting Emails to or from UNLV staff** | No |
| **I am Requesting Text Messages** | No |
| **Description of Request** (Please be specific with your request to narrow the search and respond to you quickly and efficiently.) | Dear Public Records Officer, I am writing to request a copy of all current and active revenue-share and name, image, and likeness (NIL) agreements between the University of Nevada, Las Vegas and its student-athletes, as well as any contracts administered through the university or its affiliated foundations/collectives. I am requesting these records under the Nevada Public Records Act, NRS Ch. 239. If any part of this request is denied, please provide the specific statutory exemption being invoked for each redaction or withholding. If there are fees associated with this request, please provide a cost estimate before proceeding. I would prefer to receive these records in electronic format. Thank you for your time and assistance. Sincerely, Antonio Gilkey [redacted] |
| **Please note not all public documents are available in electronic format. If the document(s) requested are not available electronically, we will make them available for inspection, pick up in person, or delivered by mail ($8.00 check or money order) in accordance with the Public Records Law.** | Electronic |

**I request (*select one*):**

# Request Information

| | |
|---|---|
| **Print Requested By:** | JamilahMcGrue |
| **Date Printed:** | 10/06/2026 |

| | |
|---|---|
| **Request Number:** | PRR-2026-288 |
| **Date of Request:** | 08/23/2026 12:00 AM |
| **Request Type:** | Public Records Request |
| **Request Status:** | Pending Department Response |
| **Public Request:** | No |

# Request Details

**Request Fields**

| | |
|---|---|
| **Preferred Method of Communication** | |
| ***(How should we reach you with questions or updates about your request?)*** | Email |
| **Name of Requester** | Anonymous Requester |
| **Requester Phone** | |
| **Requester Email** | [redacted] |
| **Are you a member of the media?** | NoMediaRequester |
| **Company Affiliation or website** | N/A |
| **I am Requesting Student Directory Information** | No |
| **I am Requesting Athletics Non-Conference Game Agreements** | No |
| **I am Requesting Athletics Head Coach Contracts** | No |
| **I am Requesting Athletics Department Contracts/Records** | No |
| **I am Requesting NCAA Reports** | No |

| | |
|---|---|
| **I am Requesting Employee Directory (non-salary) Information** | No |
| **I am Requesting Employee Salary / Compensation** | No |
| **I am Requesting University Documents / Reports / Records** | Yes |
| **I am Requesting University Purchasing / Contracts** | No |
| **I am Requesting RFP's / Proposals / Bids** | No |
| **I am Requesting Police Records** | No |
| **I am Requesting Emails to or from UNLV staff** | Yes |
| **I am Requesting Text Messages** | Yes |

Pursuant to the Nevada Public Records Act, I request electronic copies of currently existing records concerning the decision, discussion, planning, timing, announcement, and transition associated with Dr. Marc J. Kahn stepping down as Dean of the Kirk Kerkorian School of Medicine at UNLV in April 2025. The requested records include: Emails, memoranda, letters, text messages, Teams or other electronic communications, meeting notes, calendar entries, briefing materials, talking points, draft announcements, final announcements, transition documents, and other records concerning Dr. Kahn's decision or anticipated decision to step down as Dean. Records discussing the reasons, circumstances, timing, or institutional considerations associated with Dr. Kahn's departure from the deanship, including any discussion of his return to a faculty role, leadership transition, succession planning, accreditation, LCME preparation, donor or philanthropic matters, medical school governance, strategic planning, institutional leadership, or ongoing administrative matters. Records showing when UNLV, the Kirk Kerkorian School of Medicine, or NSHE leadership first became aware that Dr. Kahn would or might step down as Dean. Communications concerning the selection, appointment, or designation of Dr. Alison Netski as Interim Dean, including records discussing when interim leadership would become necessary and the anticipated effective date

**Description of Request** (Please be specific with your request to narrow the search and respond to you quickly and efficiently.)

of Dr. Kahn's departure. Communications concerning the preparation, drafting, approval, revision, or dissemination of the April 14, 2025 announcement that Dr. Kahn would step down as Dean effective April 18, 2025. Records concerning any discussion of Dr. Kahn's continued faculty appointment, reassignment of duties, compensation, administrative responsibilities, transition arrangements, or other employment terms following his departure as Dean. Communications between or among Dr. Marc Kahn, President Keith Whitfield, Interim President Chris Heavey, Provost Chris Heavey, Dr. Robert Hernandez, Dr. Alison Netski, UNLV Human Resources, the Office of General Counsel, University Advancement/Foundation personnel, and relevant NSHE officials concerning Dr. Kahn's departure or transition. Date range: January 1, 2025 through May 31, 2025. To assist with retrieval, responsive records may include terms such as: "Kahn," "Marc Kahn," "Dean Kahn," "step down," "stepping down," "departure," "transition," "leadership transition," "dean transition," "return to faculty," "faculty role," "interim dean," "Netski," "succession," "effective April 18," "April 14," "LCME," "accreditation," "strategic plan," and "dean search." This request seeks existing records only and does not ask UNLV to create a new record or answer questions. If any responsive record is withheld or redacted, please identify the specific statutory basis for each withholding or redaction and release all reasonably segregable non-exempt portions. Electronic production in native electronic format or searchable PDF is preferred.

***Search Dates:***

01.01.2025 -.05.31.2025

## Communications sent to: (identify UNLV staff or provide title/role or name)

Dr. Marc Kahn, President Keith Whitfield, Interim President Chris Heavey, Provost Chris Heavey, Dr. Robert Hernandez, Dr. Alison Netski, UNLV Human Resources, the Office of General Counsel, University Advancement/Foundation personnel, and relevant NSHE officials

## Communications sent from: (identify UNLV staff or provide title/role or name)

Dr. Marc Kahn, President Keith Whitfield, Interim President Chris Heavey, Provost Chris Heavey, Dr. Robert Hernandez, Dr. Alison Netski, UNLV Human Resources, the Office of General Counsel, University Advancement/Foundation personnel, and relevant NSHE officials

## List the Search Terms: *Please be specific. Broad terms will produce unresponsive results and further delay the completion of your request.*

*Poor example: College of Engineering, students, competition.*
*Good example: "Engineering" AND "Senior Design" OR "Engineering" AND "Competition".*

"Kahn," "Marc Kahn," "Dean Kahn," "step down," "stepping down," "departure," "transition," "leadership transition," "dean transition," "return to faculty," "faculty role," "interim dean," "Netski," "succession," "effective April 18," "April 14," "LCME," "accreditation," "strategic plan," and "dean search."

## Preferred Search Term Conditions (EXAMPLES):

**ALL terms = "Engineering Building" AND "senior design" AND "winners"**

**DUAL terms = "senior design" AND "winners"**

**AT LEAST = "senior design" OR "winners"**

AT LEAST

**Please note not all public documents are available in electronic format. If the document(s) requested are not available electronically, we will make them available for inspection, pick up in person, or delivered by mail ($8.00 check or money order) in accordance with the Public Records Law.**

Electronic

**I request (*select one*):**

# Correspondence

**Received:** 09/15/2026 01:43 PM
**To:** dd4aa89b-0383-4801-8cba-9d3f503d55aa.UNLV@request.justfoia.com
**From:** "Louis" [redacted]
**Subject:** Re: UNLV - PRR-2026-288 - REQUEST FOR CLARIFICATION

RE: PRR-2026-288 (Security Key D5A03BEB) Response to Request for Clarification of September 15, 2026

Thank you for your message and for your office's August 27 notice that you would provide records or an update by September 30. I am glad to clarify as follows.

**1. THE OPERATIVE REQUEST IS THE ENUMERATED CATEGORIES, NOT THE TERM LIST**

The search terms in the original submission were expressly offered "to assist with retrieval." They were illustrative aids, not the definition of the request. The operative request is the enumerated categories of records in the request description, which identify the records sought with specificity under NAC 239.863(c). The following categories require no keyword search at all and should be processed as document requests:

(a) Any separation agreement, transition agreement, resignation letter, memorandum of understanding, or other record of employment terms between the University (or NSHE) and Dr. Marc Kahn concerning his departure from the deanship including compensation, title, reassignment of duties, and the terms of his return to a faculty role.

(b) The April 14, 2025 announcement that Dr. Kahn would step down effective April 18, 2025, together with drafts of that announcement and the communications transmitting, revising, or approving those drafts.

(c) Records showing when UNLV, the Kirk Kerkorian School of Medicine, or NSHE leadership first became aware that Dr. Kahn would or might step down as Dean.

(d) Records concerning the selection, appointment, or designation of Dr. Alison Netski as Interim Dean.

**2. EMAIL AND TEXT SEARCHES — ADOPTING YOUR PROPOSED GROUPED STRUCTURE**

To resolve the breadth concern your office identified: the "AT LEAST" (any-term) condition applied by the request form does not reflect the intended logic. Please apply the terms in the grouped combinations below, with explicit parentheses. Individual terms such as "April 14," "Netski," or "LCME" standing alone should NOT be run as standalone searches.

Date range (unchanged from the original request): January 1, 2025 through May 31, 2025.

Custodians (unchanged from the original request): Dr. Marc Kahn; President Keith Whitfield; Interim President/Provost Chris Heavey; Dr. Robert Hernandez; Dr. Alison Netski; UNLV Human Resources; the Office of General Counsel; University Advancement/Foundation personnel; and relevant NSHE officials.

Search 1:
("Marc Kahn" OR "Dean Kahn") AND ("step down" OR "stepping down" OR "departure" OR "transition" OR "return to faculty" OR "faculty role" OR "succession" OR "resignation" OR "separation" OR "dean search" OR "LCME" OR "accreditation")

Search 2 to capture succession records that do not name Dr. Kahn:
"Netski" AND ("interim dean" OR "appointment" OR "succession" OR "transition" OR "effective April 18")

Regarding the signature-line concern: matches occurring solely within email signature blocks (e.g., "Interim Dean" in Dr. Netski's signature) may be excluded if your search tools support that distinction; if not, the grouped structure, defined custodians, and five-month date range should keep the result set manageable.

**3. WITHHOLDING, FEES, AND FORMAT**

As stated in the original request: if any responsive record is withheld or redacted, please identify the specific statutory basis for each withholding or redaction and release all reasonably segregable non-exempt portions. Please advise of any estimated fees before processing, per NRS 239.052. We prefer electronic production in native format or searchable PDF.

Given this clarification, please confirm whether the September 30 date from your August 27 notice still governs, or provide a revised date for production or an update under NRS 239.0107.

Thank you.

On Tue, Sep 15, 2026 at 9:52?AM Jamilah McGrue (UNLV) <UNLV@request.justfoia.com> wrote:
Dear Anonymous Requester,

**Clarification on the following item(s) is required for us to continue processing your request.**

> **"To assist with retrieval, responsive records may include terms such as: “Kahn,” “Marc Kahn,” “Dean Kahn,” “step down,” “stepping down,” “departure,” “transition,” “leadership transition,” “dean transition,” “return to faculty,” “faculty role,” “interim dean,” “Netski,” “succession,” “effective April 18,” “April 14,” “LCME,” “accreditation,” “strategic plan,” and “dean search.”**

In attempting to be responsive to your request, UNLV discerned that the outcome using the broad search terms you provided will yield a large universe of documents. For example every email sent to or from Dr. Marc Kahn includes “Khan” or “Marc Kahn”. Likewise, every email sent to or from Alison Netski includes “Netski” and “interim dean” in the signature line. Furthermore, as written this request will pull every email sent on April 14 to or from any of the 10+ persons you've included in this search request. This would require a search through numerous university records in order to produce documents that respond to the overly broad and/or unclear request.

The University’s obligation is to produce public records for inspection or copying upon receipt of a request that “is sufficient to identify the record.” Nev. Admin. Code 239.863(c). We would recommend you consider coupling the term "Kahn" or “Marc” with the remaining search terms:

"Marc" OR "Kahn" AND "step down,”

"Marc" OR "Kahn" AND “stepping down,”

"Marc" OR "Kahn" AND “departure,”

"Marc" OR "Kahn" AND “transition,”

"Marc" OR "Kahn" AND “leadership transition,”

"Marc" OR "Kahn" AND “dean transition,”

"Marc" OR "Kahn" AND “return to faculty,”

"Marc" OR "Kahn" AND “faculty role,”

"Marc" OR "Kahn" AND “succession,”

"Marc" OR "Kahn" AND “effective April 18",

"Marc" OR "Kahn" AND "dean search"

"Marc" OR "Kahn" AND "LCME accreditation"

"Marc" OR "Kahn" AND "strategic plan"

Please let us know how you would like to proceed. The more specific you are, the faster we can process your request. If we don't receive a response within 14 calendar days, we will have to close this request.

Thank you,

Office of Public Affairs
University of Nevada, Las Vegas
4505 S. Maryland Pkwy; Box 451012
Las Vegas, Nevada 89154
702-895-3011
PublicRecords@unlv.edu

UNLV

*Powered by*

**Sent:** 08/27/2026 02:36 PM
**To:** [redacted]
**From:** "Jamilah McGrue (UNLV)" <UNLV@request.justfoia.com>
**Subject:** UNLV - PRR-2026-288 - In Progress

RE: Request Number: PRR-2026-288
Submitted on: 08/23/2026

Dear Anonymous Requester,

Your request was forwarded to the appropriate department(s) to identify the records you seek. We will release records to you or provide you with an update on September 30th or sooner.

Thank you,

Office of Public Affairs
University of Nevada, Las Vegas
4505 S. Maryland Pkwy; Box 451012
Las Vegas, Nevada 89154
702-895-3011
PublicRecords@unlv.edu

UNLV

*Powered by*

**Sent:** 09/15/2026 09:52 AM
**To:** [redacted]
**From:** "Jamilah McGrue (UNLV)" <UNLV@request.justfoia.com>
**Subject:** UNLV - PRR-2026-288 - REQUEST FOR CLARIFICATION

Dear Anonymous Requester,

**Clarification on the following item(s) is required for us to continue processing your request.**

> **"To assist with retrieval, responsive records may include terms such as: “Kahn,” “Marc Kahn,” “Dean Kahn,” “step down,” “stepping down,” “departure,” “transition,” “leadership transition,” “dean transition,” “return to faculty,” “faculty role,” “interim dean,” “Netski,” “succession,” “effective April**

**18," "April 14," "LCME," "accreditation," "strategic plan," and "dean search."**

In attempting to be responsive to your request, UNLV discerned that the outcome using the broad search terms you provided will yield a large universe of documents. For example every email sent to or from Dr. Marc Kahn includes "Khan" or "Marc Kahn". Likewise, every email sent to or from Alison Netski includes "Netski" and "interim dean" in the signature line. Furthermore, as written this request will pull every email sent on April 14 to or from any of the 10+ persons you've included in this search request. This would require a search through numerous university records in order to produce documents that respond to the overly broad and/or unclear request.

The University's obligation is to produce public records for inspection or copying upon receipt of a request that "is sufficient to identify the record." Nev. Admin. Code 239.863(c). We would recommend you consider coupling the term "Kahn" or "Marc" with the remaining search terms:

"Marc" OR "Kahn" AND "step down,"

"Marc" OR "Kahn" AND "stepping down,"

"Marc" OR "Kahn" AND "departure,"

"Marc" OR "Kahn" AND "transition,"

"Marc" OR "Kahn" AND "leadership transition,"

"Marc" OR "Kahn" AND "dean transition,"

"Marc" OR "Kahn" AND "return to faculty,"

"Marc" OR "Kahn" AND "faculty role,"

"Marc" OR "Kahn" AND "succession,"

"Marc" OR "Kahn" AND "effective April 18",

"Marc" OR "Kahn" AND "dean search"

"Marc" OR "Kahn" AND "LCME accreditation"

"Marc" OR "Kahn" AND "strategic plan"

Please let us know how you would like to proceed. The more specific you are, the faster we can process your request. If we don't receive a response within 14 calendar days, we will have to close this request.

Thank you,

Office of Public Affairs
University of Nevada, Las Vegas
4505 S. Maryland Pkwy; Box 451012
Las Vegas, Nevada 89154
702-895-3011
PublicRecords@unlv.edu

UNLV

**Sent:** 09/28/2026 02:37 PM
**To:** [redacted]
**From:** "Jamilah McGrue (UNLV)" <UNLV@request.justfoia.com>
**Subject:** UNLV - PRR-2026-288 - Clarification Received - Request in Progress

Dear Anonymous Requester,
Your clarification response has been received and your request has been amended as follows:
1. RECORDS
(a) Any separation agreement, transition agreement, resignation letter, memorandum of understanding, or other record of employment terms between the University (or NSHE) and Dr. Marc Kahn concerning his departure from the deanship including compensation, title, reassignment of duties, and the terms of his return to a faculty role.
(b) The April 14, 2025 announcement that Dr. Kahn would step down effective April 18, 2025, together with drafts of that announcement and the communications transmitting, revising, or approving those drafts.
(c) Records showing when UNLV, the Kirk Kerkorian School of Medicine, or NSHE leadership first became aware that Dr. Kahn would or might step down as Dean.
(d) Records concerning the selection, appointment, or designation of Dr. Alison Netski as Interim Dean.
2. EMAIL AND TEXT SEARCHES
Date range: January 1, 2025 through May 31, 2025.
Custodians: Dr. Marc Kahn; President Keith Whitfield; Interim President/Provost Chris Heavey; Dr. Robert Hernandez; Dr. Alison Netski; UNLV Human Resources; the Office of General Counsel; University Advancement/Foundation personnel; and relevant NSHE officials.
Search 1:
("Marc Kahn" OR "Dean Kahn") AND ("step down" OR "stepping down" OR "departure" OR "transition" OR "return to faculty" OR "faculty role" OR "succession" OR "resignation" OR "separation" OR "dean search" OR "LCME" OR "accreditation")
Search 2:
"Netski" AND ("interim dean" OR "appointment" OR "succession" OR "transition" OR "effective April 18")
Your request is now being processed in accordance with the Nevada Public Records Act (NRS 239) and the NSHE Board of Regents Handbook and Policies. We expect to have this completed on October 29th or sooner.
Thank you,
Office of Public Affairs
University of Nevada, Las Vegas
4505 S. Maryland Pkwy; Box 451012

Las Vegas, Nevada 89154

702-895-3011

PublicRecords@unlv.edu

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| | Request Data Table Report 2024-10-01 to 2026-10-08 | | | |
|---|---|---|---|---|
| 1 | PRR-2025-124 | Feifei Fan | 6/1/2025 12:00 AM | Pursuant to the Nevada Public Records Act (NRS Chapter 239), I request the following records:<br><br>All emails, including attachments, sent or received by Yanyao Jiang between January 1, 2015 and April 30, 2015, that contain any of the following terms—“Feifei Fan,” “Feifei,” “Fan,” or “ffan9@gatech.edu”—when used as a proper noun or personal identifier referring to an individual, in the subject line, body text, or email address fields (e.g., to/from/cc/bcc).<br><br>This request is limited to communications in which those terms appear in a context referring specifically to the individual Feifei Fan. It does not seek irrelevant uses of the word “fan” in generic or non-identifying contexts (e.g., “ceiling fan”).<br><br>Please use standard institutional search tools or email archiving systems to locate responsive records. If any documents are withheld or redacted, I request a written explanation identifying the specific exemption(s) under NRS Chapter 239 and the factual and legal basis for each withholding.<br><br>Please confirm receipt of this request and provide an estimated timeline for production. Given that related litigation is pending in federal court, I also request that all potentially responsive records be preserved from deletion or modification.<br><br>Sincerely,<br>Feifei Fan |
| 2 | PRR-2025-121 | Feifei Fan | 6/1/2025 12:00 AM | Pursuant to the Nevada Public Records Act (NRS Chapter 239), I request the following records:<br><br>All emails, including attachments, sent or received by Eric L. Wang between January 1, 2015 and April 30, 2015, that contain any of the following terms: “Feifei Fan,” “Feifei,” “Fan” or "ffan9@gatech.edu" (used as a proper noun referring to an individual), in the subject line, body text, or email address fields (e.g., to/from/cc/bcc).<br><br>This request is limited to communications in which those terms appear in a context referring specifically to the individual Feifei Fan. It does not seek irrelevant uses of the word “fan” in generic or non-identifying contexts (e.g., “ceiling fan”).<br><br>Please use standard institutional search tools or email archiving systems to locate responsive records. If any documents are withheld or redacted, I request a written explanation identifying the specific exemption(s) under NRS Chapter 239 and the factual and legal basis for each withholding.<br><br>Please confirm receipt of this request and provide an estimated timeline for production. Given that related litigation is pending in federal court, I also request that all potentially responsive records be preserved from deletion or modification.<br><br>Sincerely,<br>Feifei Fan |

| | Request Data Table Report 2024-10-01 to 2026-10-08 | | | |
|---|---|---|---|---|
| 3 | PRR-2025-126 | Feifei Fan | 6/1/2025 12:00 AM | Pursuant to the Nevada Public Records Act (NRS Chapter 239), I respectfully request access to the following records:<br><br>Copies of any records created, received, or maintained by the Mechanical Engineering Department at the University of Nevada, Reno reflecting Feifei Fan's 2015 application, including materials submitted via email (from ffan9@gatech.edu) and maintained, stored, or reviewed by departmental staff in shared folders, internal databases, or other electronic repositories for administrative or instructional purposes.<br><br>This request specifically includes:<br><br>Materials submitted from ffan9@gatech.edu to Prof. Eric Wang or any other Mechanical Engineering faculty during 2015 January;<br><br>Files retained in any departmental shared folders, internal drives, or other locations accessible to Mechanical Engineering staff.<br><br>To the extent that the requested records are no longer available, I respectfully request the following information pursuant to NRS 239.0107:<br><br>A written explanation of the record retention policy applicable to these files;<br><br>A description of the steps taken to search for the records, including systems or servers queried;<br><br>The basis for any claimed exemption from disclosure, including citation to the specific statutory provision under NRS Chapter 239.<br><br>I am requesting only materials pertaining to myself (Feifei Fan), and no third-party information is requested. If any redaction is deemed necessary, I request partial production of non-exempt portions.<br><br>Please acknowledge receipt of this request and provide an estimated timeline for response. I am available to clarify scope if needed.<br><br>Sincerely,<br>Feifei Fan |

| | Request Data Table Report 2024-10-01 to 2026-10-08 | | | |
|---|---|---|---|---|
| 4 | PRR-2025-125 | Feifei Fan | 6/1/2025 12:00 AM | Pursuant to the Nevada Public Records Act (NRS Chapter 239), I request the following records:<br><br>All emails, including attachments, sent or received by Matteo Aureli between January 1, 2015 and April 30, 2015, that contain any of the following terms: “Feifei Fan”, “Feifei”, or “Fan” (used as a proper noun referring to an individual), in the subject line, body text, or email address fields (to/from/cc/bcc).<br><br>This request is limited to communications where those terms appear in a context referring to the individual Feifei Fan. It does not seek irrelevant uses of the word “fan” in non-identifying or generic contexts (e.g., “ceiling fan”).<br><br>Please use standard institutional search tools or archiving systems to locate responsive records. If any responsive records are withheld or redacted, I request a written explanation identifying the specific exemption(s) under NRS Chapter 239 and the factual basis for each withholding.<br><br>Please confirm receipt and provide an estimated timeline for production. Given that related matters are pending in federal court, I also request that you preserve all responsive records from deletion or modification.<br><br>Sincerely,<br>Feifei Fan |
| 5 | PRR-2025-122 | Feifei Fan | 6/1/2025 10:36 AM | Pursuant to the Nevada Public Records Act (NRS Chapter 239), I request the following records:<br><br>All emails, including attachments, sent or received by Henry Fu between January 1, 2015 and April 30, 2015, that contain any of the following terms—“Feifei Fan,” “Feifei,” “Fan,” or “ffan9@gatech.edu”—when used as a proper noun or personal identifier referring to an individual, in the subject line, body text, or email address fields (e.g., to/from/cc/bcc).<br><br>This request is limited to communications in which those terms appear in a context referring specifically to the individual Feifei Fan. It does not seek irrelevant uses of the word “fan” in generic or non-identifying contexts (e.g., “ceiling fan”).<br><br>Please use standard institutional search tools or email archiving systems to locate responsive records. If any documents are withheld or redacted, I request a written explanation identifying the specific exemption(s) under NRS Chapter 239 and the factual and legal basis for each withholding.<br><br>Please confirm receipt of this request and provide an estimated timeline for production. Given that related litigation is pending in federal court, I also request that all potentially responsive records be preserved from deletion or modification.<br><br>Sincerely,<br>Feifei Fan |

| | Request Data Table Report 2024-10-01 to 2026-10-08 | | | |
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| 6 | PRR-2025-123 | Feifei Fan | 6/1/2025 10:39 AM | Pursuant to the Nevada Public Records Act (NRS Chapter 239), I request the following records:<br><br>All emails, including attachments, sent or received by Emil Geiger between January 1, 2015 and April 30, 2015, that contain any of the following terms—“Feifei Fan,” “Feifei,” “Fan,” or “ffan9@gatech.edu”—when used as a proper noun or personal identifier referring to an individual, in the subject line, body text, or email address fields (e.g., to/from/cc/bcc).<br>This request is limited to communications in which those terms appear in a context referring specifically to the individual Feifei Fan. It does not seek irrelevant uses of the word “fan” in generic or non-identifying contexts (e.g., “ceiling fan”).<br><br>Please use standard institutional search tools or email archiving systems to locate responsive records. If any documents are withheld or redacted, I request a written explanation identifying the specific exemption(s) under NRS Chapter 239 and the factual and legal basis for each withholding.<br><br>Please confirm receipt of this request and provide an estimated timeline for production. Given that related litigation is pending in federal court, I also request that all potentially responsive records be preserved from deletion or modification.<br><br>Sincerely,<br>Feifei Fan |
| 7 | PRR-2025-286 | Feifei Fan | 10/22/2025 12:00 AM | Under NRS 239, please search 2015–2024 emails containing “Yanyao Jiang” and (“complaint” OR “Title IX” OR “investigation” OR “allegation") in accounts of the Title IX Coordinator (e.g., Mikiba W. Morehead, Stephanie Augdahl, Hannah L. Belleau, and successors), Office of Equal Opportunity, Human Resources Director, Dean of Engineering and associate deans (e.g., Manos Maragakis, Erick Jones), Office of The Provost (e.g., Jeff Thompson) and Office of General Counsel (e.g., Mary Dugan). Student identifiers may be redacted. |
| 8 | PRR-2025-289 | Feifei Fan | 10/23/2025 12:00 AM | Under NRS 239, please produce all emails (including attachments) dated January 1, 2021 – December 31, 2022 containing the phrase “Yanyao Jiang” or "Feifei Fan" or any of (“Fan v. Jiang” OR “Jiang v. Fan” OR “Title IX” OR “investigation” OR “complaint”) in mailboxes of the following personnel:<br>• Stephanie Augdahl (Title IX)<br>• Hannah L. Belleau (Title IX)<br>• Maria Doucettperry (Title IX Director)<br>• Tami Sontag (Title IX)<br>• Mikiba W. Morehead (TNG Consultant)<br>• Leah H. Reynolds (TNG Consultant)<br>Student identifiers may be redacted. |
| 9 | PRR-2025-292 | Feifei Fan | 10/23/2025 12:00 AM | Under NRS 239, please search January 1 – December 31, 2023 emails containing “Feifei Fan” and (“hearing” OR “schedule” OR “TNG”) in accounts of Mikiba W. Morehead, Leah H. Reynolds, Sandra C. Ketner, and any Title IX Coordinator or staff at UNR. Student identifiers may be redacted. |
| 10 | PRR-2025-290 | Feifei Fan | 10/23/2025 12:00 AM | Under NRS 239, please produce all emails dated January 1 – December 31, 2021 containing “Feifei Fan” and (“complaint” OR “Title IX” OR “investigation” OR “TPO”) in accounts of:<br>• Miles Greiner (Department Chair, Mechanical Engineering)<br>• Dean Jill S. Heaton (Vice Provost, former Dean of College of Engineering)<br>• Manos Maragakis (Dean of Engineering)<br>• UNR Human Resources Director and Employee Relations Manager.<br>Student identifiers may be redacted. |

| | Request Data Table Report 2024-10-01 to 2026-10-08 | | | |
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| 11 | PRR-2025-296 | Feifei Fan | 10/28/2025 12:00 AM | Under the Nevada Public Records Act (NRS 239), please produce all emails (and attachments) sent by or received by Jeff Thompson (@unr.edu) that: (1) reference “Fei Fei Fan” OR “Feifei Fan” OR “Fan Fei Fei” OR "Fan Feifei" OR “Fei-Fei Fan”, or my addresses ffan@unr.edu or litmus9@msn.com (2) concern Title IX matters involving me (e.g., “Fan v. Jiang” or “Jiang v. Fan” or “Fan v Jiang” or “Jiang v Fan”). Date range: Jan 1, 2021 – Jan 31, 2024. Please include complete threads and standard metadata (From/To/Cc/Bcc/Date/Subject/Message-ID). If any portion is withheld, provide an exemption/log. Student identifiers may be redacted. If needed to expedite, you may stage production by providing email headers (no bodies) first. |
| 12 | PRR-2025-297 | Feifei Fan | 10/28/2025 12:00 AM | Under the Nevada Public Records Act (NRS 239), please produce all emails (and attachments) sent by or received by personnel within the Office of General Counsel (@unr.edu), including but not limited to Mary Dugan, Jeanne Meyer, and any assistant or deputy general counsel, that:<br>(1) reference “Fei Fei Fan” OR “Feifei Fan” OR “Fan Fei Fei” OR "Fan Feifei" OR “Fei-Fei Fan”, or my addresses ffan@unr.edu or litmus9@msn.com;<br>(2) concern Title IX or HR matters involving me, including “Fan v. Jiang” OR “Jiang v. Fan” OR “Fan v Jiang” OR “Jiang v Fan”.<br>Date range: Jan 1 2021 – Jan 31 2024.<br>Please include full headers and subjects (From/To/Cc/Bcc/Date/Subject/Message-ID). Student identifiers may be redacted. If needed to expedite, you may first provide email headers (no bodies). |
| 13 | PRR-2025-306 | Feifei Fan | 11/4/2025 12:00 AM | Pursuant to the Nevada Public Records Act (NRS Chapter 239), I request copies of the following public records:<br><br>All emails (including headers and attachments) sent to ffan@unr.edu from any sender whose email address ends in or includes subdomains of:<br>• nd.edu (University of Notre Dame)<br>• northwestern.edu (Northwestern University)<br>• jhu.edu (Johns Hopkins University)<br>• northeastern.edu (Northeastern University)<br>• asu.edu (Arizona State University)<br><br>Date range: September 1, 2020 – December 31, 2023.<br><br>Please search for messages that contain any of the following keywords in the subject line or message body:<br>“interview,” “interview invitation,” or “search committee.” |
| 14 | PRR-2025-308 | Fei Fei Fan | 11/4/2025 12:00 AM | Pursuant to the Nevada Public Records Act (NRS Chapter 239), I request copies of the following records:<br><br>All emails and attachments exchanged between litmus9@msn.com and yjiang@unr.edu during January 1, 2019 through February 28, 2021. This includes:<br><br>messages sent from ffan@unr.edu to yjiang@unr.edu, and<br><br>messages sent from yjiang@unr.edu to ffan@unr.edu.<br><br>Please include standard metadata (From, To, Cc, Bcc, Date/Time, Subject, Message-ID) and complete threads where applicable.<br>If any portions are withheld as exempt, produce all non-exempt parts and provide an exemption log citing the statutory basis.<br>Preferred format: Electronic (PDF or EML).<br>If volume is high, staged production with headers first (no bodies) is acceptable. |

| | Request Data Table Report 2024-10-01 to 2026-10-08 | | | |
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| 15 | PRR-2025-307 | Fei Fei Fan | 11/4/2025 12:00 AM | Pursuant to the Nevada Public Records Act (NRS Chapter 239), I request copies of the following records:<br><br>All emails and attachments exchanged between ffan@unr.edu and yjiang@unr.edu during January 1, 2019 through February 28, 2021. This includes:<br><br>messages sent from ffan@unr.edu to yjiang@unr.edu, and<br><br>messages sent from yjiang@unr.edu to ffan@unr.edu.<br><br>Please include standard metadata (From, To, Cc, Bcc, Date/Time, Subject, Message-ID) and complete threads where applicable.<br>If any portions are withheld as exempt, produce all non-exempt parts and provide an exemption log citing the statutory basis.<br>Preferred format: Electronic (PDF or EML).<br>If volume is high, staged production with headers first (no bodies) is acceptable. |
| 16 | PRR-2025-312 | Feifei Fan | 11/9/2025 12:00 AM | Pursuant to NRS Chapter 239, I hereby request the following public records. To avoid any ambiguity and to enable an efficient electronic search, this request is limited and defined as follows.<br><br>A. Time frame: March 1, 2018 through December 1, 2018 (inclusive).<br><br>B. Custodians (search these mailboxes and document repositories):<br><br>Miles Greiner, then-Chair, Department of Mechanical Engineering — all email accounts and calendar entries.<br><br>Manos Maragakis, then-Dean, College of Engineering — all email accounts and calendar entries.<br><br>Any HR or Employee Relations personnel in the College of Engineering (including HR liaisons assigned to Mechanical Engineering) and Central HR (Human Resources) who handled faculty employment, discipline, or termination matters during the period above. (If you identify specific employee names, include their mailboxes.)<br><br>Any University counsel or legal staff who communicated about the subject (if applicable).<br><br>C. Search scope / keywords (records must contain BOTH “Shan” OR "Wanliang Shan" AND at least one of the following terms):<br>("Shan" OR "Wanliang Shan" OR "Wanliang") AND ("complaint" OR "report" OR "grievance" OR "concern" OR "toxic" OR "harassment" OR "investigation" OR "allegation" OR "discipline")<br>AND/OR<br>("Shan" OR "Wanliang Shan" OR "Wanliang") AND ("termination" OR "nonrenewal" OR "dismissal" OR "HR" OR "employment action")<br><br>(Please apply these Boolean search strings to subject lines, body text, and attachment text where full-text indexing is available.)<br><br>D. Documents requested:<br><br>Responsive emails (including attachments) meeting the above keyword criteria from the custodians listed in Section B.<br><br>Attachments to such emails, including but not limited to PDF, Word, Excel, and any reports |

| | Request Data Table Report 2024-10-01 to 2026-10-08 | | | |
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| 17 | PRR-2025-313 | Feifei Fan | 11/9/2025 12:00 AM | Emails (with headers and attachments) containing references to former Mechanical Engineering Professor Faramarz Gordaninejad (including any variation such as “Dr. Gordaninejad,” “Prof. Gordaninejad,” or “F. Gordaninejad”) sent or received between January 1, 2014 and June 30, 2018 by the following personnel: Denise Cordova, Heather Erskine, Kristi Burch, Cinda Alfred, Darcie Dayton-Wilcox, Maria Doucettperry; and by administrators in the College of Engineering (Manos Maragakis and Mechanical Engineering Chair, Miles Greiner), Office of the Provost, and Office of General Counsel (Mary Dugan, Jeanne Meyer).<br><br>Personally identifiable or confidential information may be redacted consistent with FERPA or NRS 239.0103. |
| 18 | PRR-2025-317 | Feifei Fan | 11/11/2025 12:00 AM | Pursuant to NRS Chapter 239, I request copies of the following identifiable public records:<br>1. Budget justifications submitted to the Office of Sponsored Projects (OSP) for any external or federally sponsored projects on which Feifei Fan or Yanyao Jiang served as Principal Investigator or Co-Principal Investigator from January 1, 2015 through February 1, 2024.<br><br>(Each record should include, where available, the sponsor name, award number, project title, total amount, and budget period. This request seeks only administrative budget documents submitted for grant or contract proposals, not proprietary research data or personnel evaluations.<br><br>2. Course teaching records for Feifei Fan and Yanyao Jiang, including course IDs, semesters taught, and aggregate enrollment numbers (aggregate data only; no student identifiers).<br><br>3. Federal grant award or support records related to Title IX or compliance funding received by the University of Nevada, Reno, including award and contract notification records identifying the federal agency, award number, funding amount, and performance period for each program—such as awards from the U.S. Department of Education (Office for Civil Rights), the U.S. Department of Justice (Office on Violence Against Women), or any other federal agency supporting Title IX, equity, or compliance programs.<br><br>4. Indirect Cost Recovery (ICR) or overhead distribution records showing how indirect costs or recovered overhead from federal grants were allocated to or used by the Title IX or Equal Opportunity Office during the same fiscal years.<br><br>(This request seeks only administrative and financial records sufficient to identify whether and to what extent the Title IX or Equal Opportunity Office received direct or indirect funding from federal grants. It does not seek underlying grant applications, narratives, or other substantive grant documents.<br><br>Personally identifiable information may be redacted under NRS 239.0107(1)(d).<br>Preferred format: electronic (PDF or spreadsheet).) |

| | Request Data Table Report 2024-10-01 to 2026-10-08 | | | |
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| 19 | PRR-2025-316 | Feifei Fan | 11/11/2025 12:00 AM | Pursuant to NRS Chapter 239, I request copies of emails (with headers and attachments) exchanged among or between the following custodians in UNR's College of Engineering and Department of Mechanical Engineering:<br>Miles Greiner (former Chair), Eric L. Wang (faculty), Yanyao Jiang (faculty), Petros Voulgaris (current Chair), Manos Maragakis (former Dean), and Erick Jones (former Dean).<br><br>Date range: Jan. 1, 2015 – Feb. 1, 2024.<br><br>Please include any correspondence in which at least two of the listed custodians appear in sender or recipient fields and that mentions "Feifei Fan," "Feifei," "Fan, Feifei," "ffan@unr.edu" or "ffan9@gatech.edu" together with any one or more of the following terms: "tenure," "committee," "evaluation," "assessment," "review," "proposal," "reference," or "complaint."<br><br>This request seeks only communications sufficient to show who participated, when, and in what context, not confidential votes, peer-review opinions, or evaluative content.<br>Include standard metadata (From, To, Cc, Bcc, Date/Time, Subject, Message-ID).<br>If portions are exempt, redact only those parts and provide an exemption log citing the statutory basis.<br><br>A staged or headers-only production is acceptable if volume is large.<br>Student identifiers may be redacted. |

| | Request Data Table Report 2024-10-01 to 2026-10-08 | | | |
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| 20 | PRR-2025-362 | Feifei Fan | 12/12/2025 12:00 AM | Pursuant to NRS Chapter 239, I request copies of identifiable public records sufficient to show UNR's retention, payment, authorization, and system access of TNG Consulting (TNG) in connection with any Title IX–related matter involving Fei Fei Fan and / or Feifei Fan.<br><br>Specifically, I request:<br><br>1. Records sufficient to show UNR's retention of TNG, including:<br><br>contracts, agreements, or engagement letters;<br><br>statements of work or scope documents;<br><br>records reflecting the effective dates of any such engagement.<br><br>2. Records sufficient to show payment or compensation to TNG, including:<br><br>invoices submitted by TNG;<br><br>payment approval records;<br><br>records identifying the UNR office responsible for authorizing payment.<br><br>3. Records sufficient to show authorization of access, including:<br><br>records identifying whether TNG was granted access to UNR systems, files, or case-management platforms;<br><br>records identifying who authorized such access and when.<br><br>4. Records sufficient to identify the UNR administrative offices involved, including:<br><br>Human Resources; |

| | Request Data Table Report 2024-10-01 to 2026-10-08 | | | |
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| 21 | PRR-2025-364 | feifei fan | 12/12/2025 12:00 AM | Pursuant to NRS Chapter 239, I request copies of identifiable public records sufficient to show UNR's institutional policies and administrative practices relating to employment-based immigration for faculty and research employees, including H-1B, F-1 Optional Practical Training (OPT), and employment-based permanent residence (including EB-1).<br><br>Specifically, I request:<br><br>1. Institutional policies or written guidance governing:<br><br>sponsorship, monitoring, or renewal of H-1B status;<br><br>employment of faculty or research employees under F-1 OPT;<br><br>UNR's administrative role in employment-based permanent residence processes (including EB-1), if maintained.<br><br>2. Records sufficient to identify administrative responsibility, including which UNR offices or officials are responsible for immigration-related administration or communications affecting visa-dependent faculty or researchers.<br><br>3. Aggregate or de-identified records sufficient to show institutional practice, including:<br><br>annual counts (by year) of faculty or research employees employed under H-1B or OPT status;<br><br>annual counts (by year) of UNR-supported employment-based permanent residence petitions (including EB-1), if maintained.<br><br>4. Records reflecting institutional training or guidance provided to administrators or supervisors regarding employment decisions affecting visa-dependent faculty or researchers.<br><br>Scope limitations:<br><br>This request does not seek individual immigration files, visa petitions, emails concerning a specific individual, or personally identifying information. |

| | Request Data Table Report 2024-10-01 to 2026-10-08 | | | |
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| 22 | PRR-2025-363 | Feifei Fan | 12/12/2025 12:00 AM | Pursuant to NRS Chapter 239, I request copies of identifiable public records maintained by the University of Nevada, Reno that are sufficient to show the final adoption, effective dates, and institutional implementation of policies related to faculty termination and Title IX compliance.<br><br>Specifically, I request:<br><br>1. Final, adopted versions of policies in effect during the relevant period, including:<br><br>faculty termination policies;<br><br>Title IX–related policies governing complaints, investigations, interim measures, or disciplinary actions.<br><br>2. Records sufficient to show the effective dates of each such policy, including:<br><br>approval or adoption memoranda;<br><br>effective-date notices;<br><br>policy publication records.<br><br>3. Records sufficient to show institutional implementation, including:<br><br>administrative guidance, directives, or notices issued to departments or administrators regarding implementation of the final policies;<br><br>training materials or compliance guidance reflecting how the policies were to be applied.<br><br>Scope limitations (to avoid overbreadth):<br><br>This request seeks final policies and implementation records only.<br><br>It does not seek drafts, redline versions, internal deliberations, legal advice, or policy-development communications. |

| | Request Data Table Report 2024-10-01 to 2026-10-08 | | | |
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| 23 | PRR-2025-358 | Feifei Fan | 12/12/2025 12:00 AM | Pursuant to NRS Chapter 239, I request copies of identifiable public records maintained by the University of Nevada, Reno that are sufficient to show access, viewing, transmission, or dissemination of the video referenced in UNR's Title IX process involving Feifei Fan.<br><br>Specifically, I request:<br><br>1. System-generated access or audit logs reflecting:<br><br>which UNR users, administrators, staff, investigators, or contractors accessed, viewed, downloaded, or transmitted the video;<br><br>dates and times of such access;<br><br>the system or platform through which access occurred (e.g., internal servers, case-management systems, shared drives).<br><br>2. Dissemination or transmission records sufficient to show:<br><br>whether the video was shared internally within UNR;<br><br>whether the video was transmitted to any external entity or individual (including third-party investigators or consultants);<br><br>the dates and methods of any such transmission.<br><br>3. Records identifying custodians or administrators responsible for:<br><br>granting, managing, or restricting access to the video;<br><br>authorizing dissemination or transmission of the video.<br><br>Scope limitations (to avoid overbreadth):<br><br>This request seeks administrative and system-generated records only, not the content of the video itself. |

| | Request Data Table Report 2024-10-01 to 2026-10-08 | | | |
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| 24 | PRR-2025-360 | Feifei Fan | 12/12/2025 12:00 AM | Pursuant to NRS Chapter 239, I request copies of public records sufficient to identify the governance structure and decision-making authority for any evaluative, disciplinary, or employment-related process involving Fei Fei Fan and Feifei Fan.<br><br>Specifically, I request:<br><br>1. Committee membership and appointment records sufficient to identify:<br><br>the names and roles of individuals serving on any committee that evaluated, reviewed, or made recommendations concerning Fei Fei Fan;<br><br>appointment or designation records for such committee members.<br><br>2. Decision-authority records sufficient to show:<br><br>which UNR officials or bodies possessed authority to review, recommend, approve, or decide matters concerning Fei Fei Fan;<br><br>any delegation of authority related to those decisions.<br><br>3. Conflict-of-interest and recusal records, including:<br><br>recusal statements, conflict disclosures, or determinations concerning Yanyao Jiang in connection with any evaluative or decision-making process involving Fei Fei Fan;<br><br>records reflecting whether recusal was considered, requested, approved, or denied.<br><br>Scope limitations:<br><br>This request seeks structural and procedural records only.<br><br>It does not seek evaluative opinions, peer-review commentary, vote tallies, or deliberative analysis. |

| | Request Data Table Report 2024-10-01 to 2026-10-08 | | | |
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| 25 | PRR-2025-357 | Fei Fei Fan | 12/12/2025 12:00 AM | Pursuant to NRS Chapter 239, I request copies of identifiable public records maintained by the University of Nevada, Reno that are sufficient to show access, viewing, transmission, or dissemination of the video referenced in UNR's Title IX process involving Fei Fei Fan.<br><br>Specifically, I request:<br><br>1. System-generated access or audit logs reflecting:<br><br>which UNR users, administrators, staff, investigators, or contractors accessed, viewed, downloaded, or transmitted the video;<br><br>dates and times of such access;<br><br>the system or platform through which access occurred (e.g., internal servers, case-management systems, shared drives).<br><br>2. Dissemination or transmission records sufficient to show:<br><br>whether the video was shared internally within UNR;<br><br>whether the video was transmitted to any external entity or individual (including third-party investigators or consultants);<br><br>the dates and methods of any such transmission.<br><br>3. Records identifying custodians or administrators responsible for:<br><br>granting, managing, or restricting access to the video;<br><br>authorizing dissemination or transmission of the video.<br><br>Scope limitations (to avoid overbreadth):<br><br>This request seeks administrative and system-generated records only, not the content of the video itself. |

| | Request Data Table Report 2024-10-01 to 2026-10-08 | | | |
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| 26 | PRR-2025-359 | Feifei Fan | 12/12/2025 12:00 AM | Pursuant to NRS Chapter 239, I request copies of public records sufficient to show how any Title IX–related complaint, report, or concern involving Fei Fei Fan was received, routed, and communicated within UNR.<br><br>Specifically, I request:<br><br>1. Intake or case-tracking records reflecting receipt of any Title IX or OEO matter involving Fei Fei Fan.<br><br>2. Routing or notification records sufficient to identify:<br><br>which UNR offices or officials were notified;<br><br>the dates of such notification.<br><br>3. Records sufficient to show institutional notice, including records reflecting notice to department chairs, deans, vice provosts, the provost, or the Office of General Counsel.<br><br>Scope limitations:<br><br>Administrative and procedural records only.<br><br>No investigative findings, witness statements, interview notes, or deliberative analysis are requested.<br><br>Names or sensitive personal details may be redacted.<br><br>Time period: January 1, 2021 – present.<br><br>If any record is withheld in whole or in part, please provide a record-specific written statement identifying the specific statute or legal authority relied upon under NRS 239.0107(1)(d).<br><br>Production may be made electronically via download link. |

| | Request Data Table Report 2024-10-01 to 2026-10-08 | | | |
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| 27 | PRR-2025-361 | Feifei Fan | 12/12/2025 12:03 PM | Pursuant to NRS Chapter 239, I request copies of identifiable public records sufficient to show UNR's retention, payment, authorization, and system access of The NCHERM Group (TNG) in connection with any Title IX–related matter involving Fei Fei Fan and/or Feifei Fan.<br><br>Specifically, I request:<br><br>1. Records sufficient to show UNR's retention of TNG, including:<br><br>contracts, agreements, or engagement letters;<br><br>statements of work or scope documents;<br><br>records reflecting the effective dates of any such engagement.<br><br>2. Records sufficient to show payment or compensation to TNG, including:<br><br>invoices submitted by TNG;<br><br>payment approval records;<br><br>records identifying the UNR office responsible for authorizing payment.<br><br>3. Records sufficient to show authorization of access, including:<br><br>records identifying whether TNG was granted access to UNR systems, files, or case-management platforms;<br><br>records identifying who authorized such access and when.<br><br>4. Records sufficient to identify the UNR administrative offices involved, including:<br><br>Human Resources; |
| 28 | PRR-2025-373 | Feifei Fan | 12/23/2025 12:00 AM | Pursuant to the Nevada Public Records Act, I request records sufficient to show whether Eric L. Wang sent or received any University of Nevada, Reno email communications containing the terms "retirement," "separation," "transition," or "incentive" between April 1, 2025 and December 19, 2025, limited to the following information only:<br><br>• date of the communication;<br>• sender;<br>• recipient(s);<br>• subject line.<br><br>This request does not seek the content of the communications and excludes any attorney-client privileged, deliberative, or personnel-evaluative material.<br><br>If responsive records exist, a summary, index, or other record sufficient to show the above information is acceptable. |

| | Request Data Table Report 2024-10-01 to 2026-10-08 | | | |
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| 29 | PRR-2025-375 | Feifei Fan | 12/31/2025 12:00 AM | Pursuant to Nevada Revised Statutes Chapter 239, I respectfully request access to and copies of the following public records maintained by the University of Nevada, Reno:<br><br>1.<br><br>Emails and email attachments exchanged between Paula Frybarger (Title IX Office) and Maria Doucette-Perry (Title IX Office)<br>Date range: January 1, 2020 through July 31, 2022.<br><br>2.<br><br>Emails and email attachments exchanged between Paula Frybarger (Title IX Office) and Mikiba W. Morehead<br>Date range: January 1, 2022 through January 31, 2024.<br><br>This request includes all responsive emails and attachments regardless of format or storage location, including but not limited to active email accounts, archived accounts, or other electronic record-keeping systems used by the University.<br><br>This request is made pursuant to NRS Chapter 239 for public records and is not a discovery request, nor does it seek materials prepared in anticipation of litigation. The request seeks routine administrative communications of the Title IX Office in its institutional capacity.<br><br>To the extent any responsive record includes attorney communications, this request seeks non-privileged factual or administrative portions only, and does not seek legal advice or attorney mental impressions. Any claim of attorney–client privilege or work product protection should be narrowly applied and supported by a specific statutory or legal basis.<br><br>If any responsive records contain student information protected under FERPA, please redact only the specific identifying information and produce all reasonably segregable non-exempt portions of the records.<br><br>If any records are withheld or redacted, please identify the specific statutory basis for each withholding or redaction, as required by NRS 239.<br><br>I prefer to receive the records in electronic format (PDF or native format). If you anticipate any fees associated with this request, please provide an itemized estimate prior to processing. |

## Request Details

**Request Fields**

| | |
|---|---|
| **Name of Requestor** | Megan Mather |
| **Company** | |
| **Email** | [redacted] |
| **Phone** | [redacted] |
| **Address** | [redacted] |
| **City** | [redacted] |
| **State** | [redacted] |
| **Zip** | [redacted] |

Pursuant to the Nevada Public Records Act (NRS Chapter 239), I am writing to formally request access to records related to my academic history and other associated matters at the University of Nevada, Reno. Specifically, I am requesting any and all records, communications, and documents that pertain to the following areas for the period from July, 2020, to the present time of December 2024: 1. All documents, emails, and communications involving Megan Mather, including those between or involving the following individuals: o Ann Keniston o Katherine Fusco o Dan Morse o Emily Hobson o Lynda Olman o Whitney

**Description of Request** (Be as specific as possible, including name, dates, etc., if known.)

Hughes o James Mardock o Ashley Marshall o Markus Kemmelmeier o Cassilde Isabelli o Justin Gifford o Shane Carter (Disability Resource Center) o Tyler Smith (Disability Resource Center) o Valerie Fridland 2. All records or communications specifically pertaining to: o Discussions or communications involving Justin Gifford, Katherine Fusco and Ashley Marshall regarding Megan Mather during the period 2020-2021. o Discussions or communications involving Justin Gifford, Lynda Olman, and James Mardock regarding Megan Mather during any period between 2021-2024. o Communications involving Shane Carter and Tyler Smith (Disability Resource Center) related to my academic accommodations, support services, or any matters regarding my academic progress, academic integrity and advocacy on my behalf between Shane Carter and any senior leadership on my behalf from 2022-2024 o Communications involving Valerie Fridland regarding Justin Gifford and Megan Mather, or other matters related to my academic progress, communication issues, personality, ability et.al. during any relevant period. 3. All records or communications referencing my academic progress, abilities, and role as a graduate student, including internal discussions or deliberations between all listed faculty, staff, and administrative personnel and senior leadership. 4. Communications and records regarding the resignation of members from my dissertation committee, (Ann Keniston, Katherine Fusco, Emily Hobson, Dan Morse) including internal discussions about their reasons for stepping down and decisions made about my academic standing, reputation, abilities or progress within the program. 5. Documentation or correspondence related to my comprehensive exams, including communications about their preparation, administration, and any discussions or actions taken following their completion in May 2024. 6. Any records or communications concerning charging and the appeals process for my academic integrity case, including internal discussions, deliberations, or decisions made during the process. Persons not limited to: Ann Keniston, Dan Morse, Emily Hobson, Katherine Fusco, Lynda Olman, James Mardock, Marcus Kemmelmeier, and Whitney Hughes. 7. Records or correspondence referencing my accommodations as a graduate student, including any discussions, decisions,

or actions taken by university personnel, particularly concerning the handling of exams, compliance with and/or university policies, or related matters. 8. Any communications or discussions about Megan Mather and her academic standing, reputation, or capabilities, including internal emails, memos, meeting notes, and other documents involving faculty or administrators listed above. 9. All documentation, emails, or records referencing or involving my academic history, progress, reputation, abilities, personality, disability, medical issues, my child, and standing in the department or graduate program. Please include all electronic and hard copy records, emails, memorandums, meeting notes, minutes, and any other forms of documentation relevant to the above matters. I request that these records be provided in electronic format wherever possible. If there are any fees associated with fulfilling this request, please inform me of the estimated cost before proceeding. In accordance with the Nevada Public Records Act, I request a response within the timeframe outlined by the law. If portions of my request are exempt from disclosure, please provide a written explanation for any exemptions. Thank you for your attention to this matter. I look forward to your response. Sincerely, Megan Mather Ph.D. Student, English Department [redacted] University of Nevada, Reno NSHE ID: 8001381641

September 22, 2026

Via email: publicrecords@unr.edu

Subject: Public Records Request under NRS 239.010 et seq. — Student-health webpage content: adoption & parenting prominence (UNR)

TO: Office of Marketing and Communications — Public Records, University of Nevada, Reno
EMAIL: publicrecords@unr.edu
SOURCE: https://www.unr.edu/marketing-communications/public-records

Requester:
Ramratan Pilani
[redacted]

Dear Public Records Coordinator:

Pursuant to the Nevada Public Records Act (NRS Chapter 239), I request electronic copies of the records described below. This is a request for existing records; it does not ask the institution to create a new record, conduct legal research, or answer questions.

PURPOSE (context only; this is a request for EXISTING RECORDS, not a demand to change policy):
This request concerns whether and how adoption and parenting information appear with equal prominence to abortion, contraception, and related reproductive-health topics on student-health / campus-health webpages. For context only, many campuses nationwide are asked to present adoption and parenting as clearly as other options and, where appropriate, to include a confidential adoption helpline such as 1-800-ADOPTION (1-800-236-7846). The records categories below are the ask.

SCOPE

This request concerns the institution's student-health / campus-health webpages for University of Nevada, Reno (UNR). It includes records held by the institution or any of its campuses/colleges, including records held by student health, student services, web/digital services, communications/marketing, public information, legal, accessibility, or other offices involved in creating, approving, maintaining, reviewing, or archiving those webpages.

Reference student-health/campus-health webpage URL(s) identified in the contact directory:
- https://www.unr.edu/student-health-center

TIME PERIOD

January 1, 2020 through the date you process this request and provide your response.

RECORDS REQUESTED

1. OWNERSHIP, RESPONSIBILITY, AND DECISION-MAKING

Records sufficient to show who owned, administered, edited, approved, reviewed, archived, or otherwise controlled the webpages and their content during the time period, including policies, procedures, delegations, role descriptions, workflows, approval records, vendor or agency agreements, content-management records, and communications about responsibility for the webpages.

2. CONTENT STANDARDS, EQUALITY, AND PROMINENCE

Policies, standards, guidelines, checklists, templates, training materials, accessibility or communications guidance, editorial rules, review criteria, and related records concerning how student-health webpage topics are selected, labeled, organized, linked, described, or given visibility. This includes records addressing pregnancy options, adoption, parenting, contraception, abortion, reproductive health, sexual health, or other reproductive services, and any standard or discussion of equal, comparable, balanced, or prominent visibility among those topics.

3. ADOPTION AND PARENTING VISIBILITY

Records that discuss, evaluate, propose, approve, reject, compare, measure, or otherwise concern the visibility of adoption, parenting, pregnancy options, pregnancy support, or related referrals on the webpages, including their presence or absence, placement, navigation path, prominence, headings, labels, links, search visibility, page location, calls to action, and comparison with contraception, abortion, or other reproductive services. Include complaints, inquiries, audits, accessibility reviews, analytics, meeting materials, drafts, and communications on these subjects.

4. CURRENT AND PRIOR PUBLISHED WEBPAGE CONTENT

Current and prior versions of the webpages and related published copy from the time period, including archived or superseded text, page captures, drafts that were approved or published, source files, content-management exports, page metadata, navigation/menu records, link inventories, and records showing changes to the webpages. Please include content about adoption, parenting, pregnancy options/support, contraception, abortion, reproductive health, and other reproductive services, whether presented on one page or across linked pages.

The request includes responsive records in electronic form regardless of format, including email, attachments, memoranda, presentations, spreadsheets, PDFs, word-processing files, web exports, screenshots, archived copies, and native electronic files where reasonably available. Please search custodians and systems reasonably likely to contain responsive records, including current and former web/content owners and relevant student-health, student-services, communications,

public-information, legal, accessibility, and administrative personnel.

Please provide non-exempt portions of responsive records with reasonably segregable exempt material redacted. If any records are withheld, please identify the legal basis for each withholding and provide a description sufficient to evaluate the redaction. If no responsive records are located for a category, please say so specifically. If you contend that a narrower or clarified scope is needed, please contact me before closing the request.

Please provide the records by email or electronic link to rpl2a@proton.me. I prefer commonly readable electronic formats and native formats where reasonably available. Please advise me in advance of any fee for duplication or delivery; I do not request printed copies. This request is for a non-commercial purpose.

Thank you for your assistance.

Sincerely,

Ramratan Pilani
[redacted]

## Request Details

**Request Fields**

| | |
|---|---|
| **Name of Requestor** | Drew J. Ribar |
| **Company** | Auditing Reno 911 |
| **Email** | [redacted] |
| **Phone** | [redacted] |
| **Address** | N/A |
| **City** | [redacted] |
| **State** | [redacted] |
| **Zip** | N/A |

UNR Public Records Official: Pursuant to NRS Chapter 239, I request the existing records described below concerning the University of Nevada, Reno's diversity, equity and inclusion (DEI), inclusive excellence, belonging, and related designated programs. This is a new, separate request from PRR-2026-398 concerning Northern Nevada Pride. Please assign a separate tracking number and continue processing that earlier request independently. I am requesting these records as Drew J. Ribar, publisher of Auditing Reno 911, to examine public expenditures, personnel costs, program results, equal

treatment and compliance. This request does not presume misconduct. It seeks records permitting the public to determine what these programs cost, what they accomplish, and whether particular practices comply with applicable law and funding conditions. Scope and date limits For financial and compensation records, include fiscal years 2023–24, 2024–25, 2025–26 and the approved 2026–27 budget and actual expenditures through the date this request is received. For communications, compliance and evaluations, use January 1, 2024 through the date received, except that earlier founding documents and the current operative version of policies are requested regardless of their original date. Begin with the Office of Diversity, Equity and Inclusion; Orvis School of Nursing's Office/Associate Dean for Inclusive Excellence and Belonging; UNR School of Medicine's designated diversity/inclusion or inclusive-excellence office; the Multicultural Center; and ASUN's designated diversity/IDEA office or committee. Include other UNR units only to the extent existing university organizational, budget or program records identify a designated DEI, inclusive-excellence or belonging office, position, initiative or successor. This does not request every ordinary course, clinical service or research project merely using words such as "equity," "diversity" or "inclusion." 1. Program inventory, organization and responsible people * Existing organizational charts, program inventories, annual reports, strategic plans, mission statements, founding authorizations and governance documents identifying covered offices, programs, committees, projects and successor units. * Existing staff/position rosters identifying employee names, titles, employing unit, supervisor, employment dates, appointment type, full-time-equivalent allocation and official business contact information. Include vacant funded positions and positions with responsibilities split between covered programs and other work. * Position descriptions, assigned duties, appointment/position authorization documents and approved reporting structures for directors, associate deans, coordinators, administrative staff and paid student positions assigned to these programs. Include committee membership and chair rosters, distinguishing paid assignments from voluntary service where recorded. * Records of establishment, expansion, consolidation, renaming, transfer or

closure of these units and positions, including before-and-after organization charts and budget transfers. Include records identifying the program's continuing functions under a different name. 2. Individual compensation and personnel cost * For each employee assigned to a covered office or designated program position, existing payroll/compensation records showing name, title, fiscal year, base salary or hourly rate, actual gross pay, overtime, supplemental/stipend pay, bonuses or additional compensation, and employer-paid retirement and benefit costs to the extent recorded and disclosable. * Existing records showing the share of compensation charged to each covered program, FTE/effort allocations, funding accounts and grant/project codes. Where a person has mixed duties, provide the recorded allocation rather than attributing the entire salary to DEI. If no program allocation is maintained, please state that distinction and provide the existing position and account records. * Approved salary schedules, position budgets, salary changes, reclassification approvals, additional-duty payments, release-time or course-buyout funding and relevant compensation policies. Include paid advisory/committee assignments and consultant compensation. * Existing travel reimbursements, conference registration, memberships, training and professional-development payments charged to covered offices or programs, showing payee, purpose, date, amount and approving official. I do not request Social Security numbers, bank details, tax withholding, medical information, home addresses, dependent information or unrelated personnel evaluations. Please separate these details from disclosable employment and expenditure records. For student employees, provide disclosable payroll information; if a name is lawfully confidential, redact it and provide the remaining position, cost and allocation information with the specific withholding authority. 3. Budgets, spending and sources of money * Approved and proposed budgets, amendments, actual expenditure reports, year-end reconciliations, account balances, internal transfers and existing general-ledger transaction exports for covered units/programs. Include account/fund identifiers, dates, amounts, descriptions, payees and program/project codes as maintained. * Existing records identifying revenue sources: state

appropriations, tuition, mandatory or optional student fees, federal grants/contracts, state or local grants, restricted gifts, foundation transfers, endowments, sponsorships and other revenue. Include applicable restrictions and recorded allocations of central administrative overhead, facilities or support costs. * Contracts, scopes of work, procurement approvals, bids/quotes where maintained, invoices, purchase orders, payment records and deliverables for outside consultants, trainers, speakers, vendors and partner organizations paid by covered units. Include sole-source justifications, procurement exceptions and applicable approval policies. * Records of grants, sponsorships, donations, scholarships, awards and other financial support paid to outside organizations or individuals through covered programs. For Pride/Our Center transactions already produced in PRR-2026-398, identify the earlier production rather than reproduce identical documents; include additional records establishing funding source, actual payment and account allocation. 4. What programs actually do * Existing program catalogs, work plans, event calendars, training curricula, presentation slides, participant handouts, speaker agreements and program descriptions for covered initiatives. * Records establishing whether activities are mandatory or voluntary, attendance/completion requirements, employee or student consequences for nonparticipation, and complaint or accommodation procedures. * Policies, application materials, eligibility criteria, selection rubrics and reviewer instructions for program access, hiring, promotion, scholarships, awards, mentoring, affinity groups and resource allocations administered by covered units. Include any demographic preferences, targets, set-asides, restrictions, diversity statements or viewpoint-related requirements actually adopted or used. * Existing aggregate participation, application, selection and attendance reports and program expenditures. Exclude identifiable student education records, patient/client files and unrelated private participant information. 5. Measured public benefit, economic outcomes and value for money Please provide existing evaluations, needs assessments, performance measures, annual outcome reports, internal/external reviews, cost-benefit analyses, return-on-investment studies and reports assessing whether covered programs improve: * Student retention, graduation,

completion time, employment placement, earnings, licensure, internships or access to career opportunities; * Workforce readiness, recruitment, retention, productivity or reductions in turnover and associated costs; * Access to healthcare, documented health outcomes or service delivery, where assessed; * Community economic development, household economic security, or reductions in institutional costs. Include existing baseline/comparison data, methodologies, benchmarks, success/failure criteria, evaluator findings, limitations, costs and management responses. Include records distinguishing measured outcomes from attendance figures, satisfaction surveys or promotional claims, and records supporting quantified public-benefit claims in reports, budget proposals or funding applications. Please include existing reviews finding no measurable benefit or recommending modification or termination. I am not asking UNR to write an explanation, create a new economic study, or calculate a new return on investment. If no responsive evaluation or monetary-benefit study is maintained for a category, please identify that result rather than substitute promotional material for an evaluation. 6. Legal and funding compliance * Nonprivileged final policies, compliance directives, implementation plans, certifications and notices concerning covered programs' compliance with applicable federal/state anti discrimination requirements, equal access, employment rules and funding conditions. * Records addressing Executive Orders 14151, 14173 and 14398 and implementing agency guidance as they relate to covered UNR programs: grant/contract clauses, signed certifications, compliance reviews, corrective actions and changes to funding, staffing, curriculum, eligibility or activities. Include the applicable funding instrument and award number where recorded. * Federal/state agency or accreditor notices concerning these programs, including audit findings, compliance inquiries, warnings, funding holds, grant/contract cancellations, repayment demands, sanctions and UNR's nonprivileged responses. * Existing grant-cost allocation reviews and final determinations addressing whether program expenditures were allowable under particular awards. Include records addressing use of restricted gifts or student-fee funds for the covered activities. 7. Complaints, audits and safeguards * Existing

**Description of Request** (Be as specific as possible, including name, dates, etc., if known.)

complaint logs or aggregate reports, completed investigation findings and final administrative dispositions concerning covered programs' discrimination, retaliation, compelled participation or speech, viewpoint-based exclusion, procurement irregularities, conflicts of interest, inaccurate reporting or misuse of funds, to the extent disclosable. * Internal/external audit reports, inspector or compliance reviews, substantiated findings, corrective-action plans and management responses concerning covered programs and spending. * Disclosable conflict disclosures, recusals, outside-interest disclosures and approval records involving the program's decision-makers and paid outside partners. Limit this to covered program transactions and official decisions. Please redact lawfully protected complainant, witness, student or personnel details while providing segregable public information. This category does not request unrelated employee files or privileged legal advice. 8. Focused decision-making communications For January 1, 2025 through receipt, please search official-business communications of the heads of the initial units listed above, their responsible budget/finance administrators, and the President/Provost personnel specifically assigned to decisions about these units. Limit this search to: * Establishing, funding, restructuring, renaming, transferring or discontinuing a covered office or program; * Implementing the three executive orders or agency funding/compliance conditions; * Adopting protected-characteristic or viewpoint-related eligibility/selection requirements; * Reviewing program effectiveness, material audit findings, questioned costs or corrective actions. Relevant search terms include the covered office/program's exact name paired where useful with budget, salary, funding, evaluation, outcomes, eligibility, preference, quota, certification, compliance, executive order, 14151, 14173, 14398, rename, restructure, audit or corrective action. A message need not contain every term. Please include responsive attachments and official-business text/collaboration records within University custody or control. Do not interpret this as a demand to search every University employee's communications or every use of the word "equity." 9. Enrollment demographics, residency, citizenship and immigration-status categories For this enrollment and student-finance section, request existing reports for

academic years 2021–22 through 2025–26 and the latest available fall 2026 enrollment snapshot. For associated finances, use fiscal years 2021–22 through 2025–26 and available 2026–27 budget/current-year records. The shorter date ranges for the other sections remain unchanged. * Existing enrollment headcounts and FTE reports by the University's race/ethnicity reporting categories, separately for undergraduate, graduate and professional students, and by full-time/part-time status where maintained. Include total enrollment denominators, unknown/not-reported categories, definitions, snapshot dates and methodology. * Existing reports distinguishing Nevada tuition residents, domestic out-of-state students and international students, including state/county of permanent residence or origin where maintained in aggregate. Include Washoe County and other Nevada counties separately where available. Please distinguish tuition residency, address/permanent residence, citizenship and immigration status; do not equate out-of-state or international enrollment with undocumented status. * Existing aggregate reports or counts identifying U.S. citizens, lawful permanent residents, international students on temporary visas (including F-1/J-1 or other categories if maintained), and other recorded citizenship/immigration categories. Include existing aggregate counts of enrolled students identified in University records as undocumented or lacking lawful immigration status, DACA recipients, and other separately recorded categories such as asylum/refugee or temporary protected status, only to the extent those categories are actually maintained and disclosable. Please provide the exact definitions and explain through existing documentation whether categories overlap; DACA, noncitizenship and international-student status must not be treated as interchangeable with undocumented status. * For the question of students whose permanent residence is outside the United States, provide existing aggregate reports of foreign permanent-residence/country-of-origin categories, separately from visa/citizenship classifications. Include country totals where available and lawfully disclosable, with protected small cells suppressed as necessary. * Existing policies, application instructions, reporting specifications or data dictionaries showing which citizenship, visa, immigration-status and residency fields UNR collects or does not collect, whether information is self-

reported or verified, and how missing/unknown information is classified. If UNR does not maintain an identifiable count of undocumented students, please state that records are not maintained or no responsive aggregate records were located, rather than treating all noncitizens, unknown-status students or students lacking Nevada residency as undocumented. * Existing aggregate application, admission, enrollment/yield, retention, graduation/completion, placement and earnings reports by the foregoing demographic/residency categories where already maintained. Include existing comparisons to Washoe County, statewide Nevada and college-age population benchmarks, with sources, age ranges, denominators and methods. I will perform comparisons independently if UNR maintains no such comparison records. 10. Student-related revenue, subsidies, aid and eligibility rules * Existing aggregate reports showing tuition and mandatory-fee revenue, nonresident tuition charges, tuition discounts/waivers, scholarships, grants and other financial aid by Nevada resident, domestic out-of-state and international categories. Include undocumented, DACA or other immigration categories only where such financial reports are already maintained. Distinguish gross assessed tuition, waived/discounted amounts, collections and net revenue where recorded. * Existing budgets, revenue-source reports and expenditure records for programs specifically supporting international, undocumented or DACA students, including any designated advising, legal assistance, scholarships, tuition assistance or emergency aid. Identify appropriations, tuition, student fees, federal/state/local grants, restricted gifts, foundation transfers and other sources, together with applicable funding restrictions and recorded staff-cost allocations. * Current and historically applicable admission, tuition-residency, nonresident-waiver, scholarship and financial-aid eligibility policies for these categories, including adopted statutory/regulatory references, nonprivileged implementation guidance, approvals and compliance certifications. Include existing records distinguishing eligibility for federal assistance from state, institutional or privately funded assistance. * Existing audit findings, questioned costs, final compliance determinations, repayment demands and corrective actions concerning immigration/residency eligibility for

the above assistance or use of restricted funds. This seeks program-level compliance records and segregable findings, not individual student immigration files. * Existing University-wide annual revenue and expenditure summaries identifying state appropriations, tuition/fees, federal grants/contracts, state/local grants, gifts/endowment/Foundation support and other revenue, plus existing reports connecting covered DEI/student-support programs to those sources. Do not assume an expenditure used federal funds merely because UNR receives federal awards. Aggregate records and privacy These enrollment and student-finance categories seek existing aggregate reports, published submissions (including IPEDS or NSHE reports), standard existing dashboard exports and nonidentifying financial summaries. I do not request student names, identifying records, immigration documents, addresses, individual aid files or personally identifiable education records. Please use lawful redaction or small-cell suppression where needed and produce segregable totals, definitions and methodology. Do not infer immigration status from race, ethnicity, nationality or address, or create a new classification. If a requested cross-tabulation or analysis does not exist, please identify that limitation and provide the responsive existing reports; no new study or calculation is requested. Production priorities and handling Please begin rolling production with organizational/position rosters, salary and program-allocation records, budgets, ledger exports and existing outcome evaluations (Items 1–3 and 5), together with readily available aggregate enrollment and student-finance reports (Items 9–10). Existing spreadsheet/CSV exports are preferred where readily available; I do not request a newly constructed database or report. If a specific category requires additional clarification or creates a documented burden, please identify the category, custodians or repositories involved and propose a staged or narrower search. Continue processing the remaining identifiable categories. If another public entity holds particular records, identify that custodian and its contact information if known. For foundation-related activity, this request seeks records held by or within UNR's legal custody or control. Please respond under NRS 239.0107 within the applicable five-business-day period with production, the required

availability notice, custodian information or a denial identifying specific legal authority, as appropriate. If records require more time, provide the earliest date and time you reasonably believe they will be available. Please distinguish no records located, search pending and records withheld. Please identify the specific legal authority for each withholding/redaction and produce reasonably segregable nonexempt portions. If privilege is asserted, please provide a description sufficient to identify the record/category, date and basis without revealing privileged content. Please provide native electronic records and existing metadata where readily available, avoid unnecessary duplicate copies, and preserve responsive records while this request is pending. Please provide an itemized fee estimate and obtain my approval before incurring charges exceeding $25. This request does not authorize costs above $25. Please acknowledge receipt and provide the new tracking number. Respectfully, Drew J. Ribar Auditing Reno 911 [redacted]

**From:** Rodriquez, Ernesto A.
**To:** AGGeneralCounsel
**Subject:** Washoe County Manager"s Office-3 Examples of overbroad or unduly burdensome Public Records Requests and fee schedule
**Date:** Friday, September 25, 2026 2:33:17 PM
**Attachments:** image002.png
image003.png
image004.png
image005.png
Fees for Public Records Requests.pdf

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**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello!

Attached you will find our fee schedule. Also here are 3 overbroad or unduly burdensome Public Records Requests:

1. **Request 26-2671 from Jeffrey Merritt Wilson**

   To: Washoe County 311 / Public Records

   CC:
   ahill@washoecounty.gov
   jherman@washoecounty.gov
   meclark@washoecounty.gov
   mcgarcia@washoecounty.gov
   candriola@washoecounty.gov
   mfink@washoecounty.gov
   dertell@washoecounty.gov
   cgiesinger@washoecounty.gov
   bfarmer@washoecounty.gov

   RE: PUBLIC RECORDS REQUEST – 0 Pah Rah Springs Road, APN 077-460-02 / WTDLP24-0003

   To Washoe County Public Records:

   Pursuant to the Nevada Public Records Act, I request electronic copies of all records concerning any environmental, biological, aquatic-species, drainage, stream, waterway, wetland, fish, wildlife, or habitat review associated with 0 Pah Rah Springs Road, APN 077-460-02, and WTDLP24-0003, including the existing

land bridge/culvert crossing and reported waterway obstruction.

This request specifically seeks:

Every environmental assessment, biological assessment, species survey, habitat assessment, aquatic-resource study, drainage/waterway inspection, field inspection, photograph, report, memorandum, checklist, GIS record, consultant report, or agency determination concerning this property or subdivision.
Every record determining whether Lahontan cutthroat trout (Oncorhynchus clarkii henshawi), “Carson guppy” or any fish referred to by that common name, other fish, tadpoles/amphibians, or any threatened, endangered, sensitive, protected, or aquatic species are or may be present in the affected drainage or waterway.
Every record showing whether Washoe County, the applicant, Millennium Properties of Northern Nevada LLC, or any consultant contacted or obtained review from the U.S. Fish and Wildlife Service, Nevada Department of Wildlife, Nevada Division of Environmental Protection, Nevada Division of Water Resources, U.S. Army Corps of Engineers, or any other environmental/resource agency.
Every inspection, permit, grading permit, engineering plan, drainage calculation, hydrology study, environmental authorization, stream/waterway authorization, or other approval for construction of the existing land bridge, culverts, fill, grading, or other alteration of the waterway.
Records identifying whether an actual on-site environmental or biological inspection occurred, the date of each inspection, who performed it, what was inspected, and all resulting findings, photographs and reports.
Records showing whether anyone evaluated the environmental consequences of restricting, diverting, impeding, concentrating, or otherwise altering water flow through the existing land bridge/culverts, including effects upon fish passage, aquatic habitat, amphibians, downstream habitat, erosion, sedimentation, water quality, and upstream/downstream property.
All records supporting Washoe County's determination that the condition requiring that natural drainage not be impeded has been or can be satisfied for WTDLP24-0003.
All communications concerning these subjects between Planning & Building, Engineering, Code Enforcement, the County Commissioners, Millennium Properties/Charles S. Kelly, Wilcox Ranch Property Owners Association, Wilcox Ditch Company, and any state or federal environmental agency.
This request is particularly directed at determining whether the required environmental/species/waterway investigation was actually performed or

whether no such investigation occurred.

The County has previously been placed on notice of allegations concerning the waterway alteration, unpermitted grading, and obstruction at this location. The condition has reportedly remained unresolved for approximately a year and a half. The affected drainage and access conditions also concern property owners associated with the Wilcox Ranch Property Owners Association and Wilcox Ditch Company.

REQUEST FOR SPECIFIC YES/NO IDENTIFICATION

If the County possesses no responsive records establishing that an environmental, aquatic-species, or biological field inspection was performed before or after construction of the land bridge/waterway alteration, please expressly state that no responsive records were located.

Likewise, please identify whether the County possesses records showing that the land bridge/waterway alteration itself was engineered, permitted, inspected, and environmentally reviewed.

Please provide records electronically in their native format where reasonably available, including attachments and photographs.

This request is being made in connection with ongoing disputes and litigation. Please preserve all potentially responsive records, including emails, text messages, photographs, inspection records, GIS information, and communications concerning APN 077-460-02 and WTDLP24-0003.

Please assign a public-records request number and confirm receipt.

2. **Service Request 130030 from Virginia Hally**

Under NV public records law, we are requesting as follows-

ALL public records requests received by Washoe County for November 2022, December 2022 and YTD for January. Please include all Washoe agencies. The list should include date of request, item(s) requested, who requested and if there were affirmative results.

3. **Request 24-61 from Mike Clark**

Please provide me all emails and text messages between Commissioner Jeanne Herman and Assistant County Manager Kate Thomas for the month of September 2024.
You ask for the department below - however I am not asking for emails and text messages just limited to the Manager's Office - County Commission, I am asking for all emails and text messages.

Have a great day!

**Ernie Rodriguez**
**Washoe311 Service Center**
**Office Supervisor | Communications Division | Office of the County Manager**
erodriguez@washoecounty.gov | Office: 775.328.2735 | Fax: 775.328.2491
1001 E. Ninth St., Bldg. A, Reno, NV 89512

NOTICE: This communication, including any attachments, may contain confidential information and is intended only for the individual or entity whom it is addressed. Any review, dissemination, or copying of this communication by anyone other than the recipient is strictly prohibited by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521. If you are not the intended recipient, please contact the sender by reply email, delete and destroy all copies of the original message.

# Washoe County, NV Public Record Requests

Request #26-405
Closed
As of October 13, 2026, 2:49pm
Request Visibility: Published

## Details

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**FORMAL PUBLIC RECORDS REQUEST**

**RE: Northeast Connector Project — Wilcox Ranch Road & Pah Rah Springs Road Area**

To Whom It May Concern:

Pursuant to the Nevada Public Records Act (NRS Chapter 239), this is a**formal request for production of public records** concerning the proposed Northeast Connector roadway and any related planning, engineering, or development activity affecting:

- **Wilcox Ranch Road**
- **Pah Rah Springs Road**
- Surrounding Warm Springs / Spanish Springs planning areas

This request seeks the most detailed and current information available regarding the**precise roadway location, proximity impacts, access planning, and associated development activity** in the subject area.

**I. EXACT ROAD ALIGNMENT & LOCATION DATA**

Please produce **ALL records** showing the precise, conceptual, draft, or modeled location of the proposed Northeast Connector, including but not limited to:

- Corridor alignment maps (all versions)
- Preferred or recommended corridor documents
- GIS shapefiles / geodatabases
- CAD and engineering design files
- Quantum modeling inputs and outputs
- Alternative screening maps and scoring sheets
- Right-of-way exhibits
- Survey control and base-map files
- Traffic modeling network files
- Typical cross-sections tied to specific alignments

**Specific emphasis:** Provide materials clearly depicting the roadway's **distance from and relationship to BOTH:**

- Wilcox Ranch Road
- Pah Rah Springs Road

**II. INTERSECTIONS, ACCESS, AND CONNECTIVITY**

Please produce all records identifying any **existing, proposed, conceptual, or future**:

- 
  - Intersections
  - Interchanges
  - Collector connections
  - Emergency access routes
  - Local road tie-ins
  - Access management plans
  - Phasing of access construction

within **two (5) miles** of:

- 
  - Wilcox Ranch Road
  - Pah Rah Springs Road

Include funded and unfunded conceptual planning materials.

**III. IMPACT ANALYSIS – WILCOX RANCH & PAH RAH SPRINGS**

Please produce all studies, memoranda, or analyses addressing impacts to the subject area, including:

- 
  - Traffic impact analyses
  - Travel demand modeling outputs
  - Noise studies
  - Environmental constraints mapping
  - Right-of-way acquisition impacts
  - Property impact or displacement analysis
  - Emergency access reviews
  - Safety analyses
  - Community impact evaluations
  - Any parcel-level proximity mapping

**IV. DEVELOPMENT ACTIVITY IN THE WILCOX RANCH / PAH RAH AREA**

For the period **January 1, 2015 to present**, please produce all records regarding proposed, pending, or approved development within **three (5) miles** of Wilcox Ranch Road or Pah Rah Springs Road, including:

- 
  - Master Plan amendments
  - Area Plan amendments
  - Zoning changes
  - Tentative maps / parcel maps
  - Major project applications
  - Development agreements
  - Pre-application meeting notes
  - Staff reports
  - Traffic studies tied to development
  - Infrastructure planning tied to growth
  - Any references to Millennium Properties or related filings

**V. MASTER PLAN & LONG-RANGE TRANSPORTATION FILES**

Please produce all long-range planning materials referencing the Northeast Connector or growth in the subject area, including:

- Regional Transportation Plan entries
- Capital Improvement Program listings
- Corridor preservation maps
- Spanish Springs Area Plan materials
- Warm Springs planning materials
- Growth forecasts used in modeling
- Any RTC or County board briefing materials

**VI. INTERNAL & INTERAGENCY COMMUNICATIONS**

Please produce all communications containing the following search terms:

- "Northeast Connector"
- "Vista Boulevard (Golden Eagle)"
- "La Posada"
- "Wilcox Ranch"
- "Pah Rah Springs"
- "USA Parkway connection"
- "TRIC connector"

Records to include:

- Emails
- Text messages
- Teams/Slack messages
- Memoranda
- Meeting minutes
- Consultant communications
- Interagency correspondence

**VII. MAP INSPECTION REQUEST**

If any responsive materials are too large to transmit electronically, I request the opportunity to **inspect all large-format maps in person**, including:

- Corridor roll plots
- Engineering plan sets
- GIS wall maps
- Right-of-way exhibits

and to obtain copies at standard statutory cost.

**VIII. FORMAT OF PRODUCTION**

Please provide records in electronic format where available (PDF, GIS, CAD, or native digital format).

If any portion of this request is denied, please cite the specific statutory exemption and release all reasonably segregable portions.

# Washoe County, NV Public Record Requests

Request #26-1015
Closed
As of October 13, 2026, 3:01pm
Request Visibility: Published

## Details

I would like all emails to and from including subject line and context in accordance with law for public records request , Cate Salim a washoe county employee. Emails from 1-1-24 through 4-11-26.

*Received*

**April 11, 2026** via web

*Due*

**May 22, 2026**

*Departments*

**District Attorney, Technology Services**

*Additional Information*

No additional information available

*Requester*

**Jim Shirk**

[redacted]
JS

*Requester email status list*

Request opened

- **Sent** *April 11, 2026, 1:33pm*
- **Delivered** *April 11, 2026, 1:33pm*
- **Opened** *April 11, 2026, 1:51pm*

External message added

- **Sent** *April 13, 2026, 7:55am*
- **Delivered** *April 13, 2026, 7:55am*
- **Opened** *April 13, 2026, 8:25am*

External message added

# Washoe County, NV Public Record Requests

Request #26-1688
Closed
As of October 13, 2026, 2:51pm
Request Visibility: Published

## Details

PUBLIC RECORDS REQUEST

NOTARIZATION, AFFIDAVIT, INTAKE, ACCEPTANCE, AND FILE-STAMP PROCEDURES

(THREE-YEAR PERIOD)

To: Washoe County Public Records Custodian

Pursuant to NRS Chapter 239, I request inspection and production of the following public records maintained by Washoe County Planning and Building, Code Enforcement, Community Services, Board of Adjustment personnel, and any associated records custodian.

Time Period:

January 1, 2023 through present.

This request is limited to existing records concerning notarization, affidavit execution, intake review, file-stamping, acceptance, rejection, authentication, and processing of Board of Adjustment appeals and administrative enforcement appeals.

REQUEST NO. 1

Produce all written policies, procedures, manuals, standard operating procedures, desk manuals, directives, memoranda, guidance documents, training materials, checklists, workflow documents, and written instructions concerning:

(a) notarization requirements for appeals;

(b) affidavit requirements for appeals;

(c) acceptance or rejection of appeal applications;

(d) file-stamping requirements;

(e) intake review procedures;

(f) authentication or verification of appeal filings.

REQUEST NO. 2

Produce all forms, templates, checklists, intake sheets, review sheets, routing forms, processing forms, or acceptance-review documents used by County personnel when determining whether an appeal filing is accepted, rejected, processed, or deemed complete.

REQUEST NO. 3

Produce all records identifying the office, position, employee classification, or department responsible for:

(a) determining whether notarization is required;

(b) determining whether affidavits are sufficient;

(c) determining whether appeal applications are complete;

(d) determining whether file stamps are applied;

(e) determining whether appeal applications are accepted for processing.

REQUEST NO. 4

Produce all records reflecting any change, modification, suspension, waiver, exception, deviation, or alternate procedure concerning notarization, affidavit execution, file-stamping, or acceptance requirements during the period January 1, 2023 through present.

REQUEST NO. 5

Produce all communications, memoranda, emails, directives, meeting materials, or guidance documents exchanged between Planning and Building, Code Enforcement, Community Services, the Board of Adjustment, the District Attorney's Office, or Technology Services concerning:

(a) notarization requirements;

(b) affidavit requirements;

(c) appeal application sufficiency;

(d) acceptance or rejection procedures;

(e) filing authentication procedures.

This request is limited to records created, transmitted, or maintained between January 1, 2023 and present.

REQUEST NO. 6

Produce the complete intake, routing, acceptance, review, processing, and filing records associated with Appeal No. WVIO-PLA24-0100, including:

(a) routing records;

(b) intake records;

(c) acceptance records;

(d) filing records;

(e) file-stamp records;

(f) workflow records;

(g) metadata maintained in the ordinary course of business;

(h) records reflecting review for completeness;

(i) records reflecting whether notarization or affidavit requirements were evaluated.

REQUEST NO. 7

Produce any retention schedules, records-retention policies, records-management procedures, or document-control procedures applicable to Board of Adjustment appeal applications and associated intake records.

If any responsive records are withheld, please identify the record withheld, the statutory basis relied upon, and the custodian making the withholding determination.

If responsive records are claimed not to exist, please identify the office or custodian conducting the search and the records category searched.

Electronic production is requested where available.

Work Order #_____

# Customer Service Request

**Requested:** **Routine Maintenance:** **Emergency:**

| | |
|---|---|
| Address 1 | |
| Address 2 | |
| City | |
| State/Province | |
| Zip/Postal Code | |
| | Public Records Center |
| | Washoe County Sheriff's Office |
| Type of Records | Other\| |
| Case Number(s) | |
| Booking Number(s) | |
| Date(s) or Date Range | |
| Person 1 - Name | |
| Person 1 - DOB | |
| Person 1 - SSN | |
| Add Another Person? | 0 |
| Person 2 - Name | |
| Person 2 - DOB | |
| Person 2 - SSN | |
| Add Another Person? | 0 |
| Person 3 - Name | |
| Person 3 - DOB | |
| Person 3 - SSN | |
| Describe the Record(s) Requested | Requesting bodycam footage of all arrests made in January 2022 and accompanying police reports |
| Have you attached a photo id? | |
| Preferred Method to Receive Records | Electronic via Records Center |
| Clarifications Requested | |
| Clarifications Received | |

| | |
|---|---|
| Reference No: | R012994-120623 |
| Request Status: | Denied Exemption |
| Service Request Type: | Sheriff Public Records Request |
| [redacted] | [redacted] |
| Create Date: | 12/6/2023 9:14:42 AM |
| Update Date: | 12/12/2023 3:51:19 PM |
| Source: | Web |

Work Order #_____

# Customer Service Request

**Requested:** **Routine Maintenance:** **Emergency:**

| | |
|---|---|
| **Address 1** | |
| **Address 2** | |
| **City** | |
| **State/Province** | |
| **Zip/Postal Code** | |
| | Public Records Center<br>Washoe County Sheriff's Office |
| **Type of Records** | Other\| |
| **Case Number(s)** | |
| **Booking Number(s)** | |
| **Date(s) or Date Range** | 01/31/2025 |
| **Person 1 - Name** | Unknown suspect livestreaming hostage situation |
| **Person 1 - DOB** | |
| **Person 1 - SSN** | |
| **Add Another Person?** | 0 |
| **Person 2 - Name** | |
| **Person 2 - DOB** | |
| **Person 2 - SSN** | |
| **Add Another Person?** | 0 |
| **Person 3 - Name** | |
| **Person 3 - DOB** | |
| **Person 3 - SSN** | |
| **Describe the Record(s) Requested** | Hello, Under the Nevada Open Records Act Â§ 239 et seq, EWU Media LLC, as a member of the media acting in the best interest of the general public, is submitting this request. Please provide all records that discuss or describe: NAME: UNKNOWN SUSPECT CRIME: A MAN HOLDING SOMEONE HOSTAGE AND LIVESTREAMING DATE OF CRIME: 01/31/2025 LOCATION: Washoe County, NV (Reno PD is responding to the scene with Sparks PD and Washoe |

| | |
|---|---|
| **Reference No:** | R021101-013125 |
| **Request Status:** | Denied Exemption |
| **Service Request Type:** | Sheriff Public Records Request |
| **Priority:** | Low |
| **Assigned To:** | Visual Media Unit |
| **Email:** | [redacted] |
| **Name:** | Aimee James |
| **Phone:** | [redacted] |
| **Address:** | [redacted] |
| **City:** | Las Vegas |
| **State/Province:** | NV |
| **Zip/Postal Code:** | [redacted] |
| **Create Date:** | 1/31/2025 4:00:04 PM |
| **Update Date:** | 4/23/2025 11:04:13 AM |
| **Source:** | Web |

| | |
|---|---|
| | County) REQUESTING: All interrogation footage filmed in relation to the case in video format (in audio if the interview was not filmed), all interview footage filmed in relation to the case in video format (in audio if the interview was not filmed), all witness interviews related to the case in video format (audio if the interview was not filmed), crime scene photos, crime scene videos, evidence photos, evidence videos, all 911 calls recorded in relation to the case in audio format, police reports, all body camera footage recorded in relation to the case in video format, all dash camera footage filmed in relation to the case in video format, all CCTV/surveillance footage related to the case in video format, all video recordings and audio recordings related to the case, and all phone evidence related to the case. I confirm that this request for public records is being made for non-commercial purposes and is intended to serve the public interest. As a news agency, EWU Media LLC seeks to inform and educate the public about government accountability and transparency. The requested records will be used to produce educational and journalistic content shared on platforms such as YouTube and Facebook, which serve as modern forums for public discourse. While these platforms may be monetized, the primary purpose of this request is to benefit the public by providing access to critical information. I would request a prompt response to this request. If you expect a significant delay in responding to or in fulfilling this request, please contact me with information about when I might expect copies or the ability to inspect the requested records. If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law. Thank you for considering my request. Thanks for your time, EWU Media LLC 5940 S Rainbow Blvd Ste 400 PMB 82434 Las Vegas, Nevada 89118-2507 US 702-675-8885 DISCLAIMER: EWU Media LLC requires that the agency responding to this public records request provide EWU Media LLC with a written, itemized estimate of any charges, fees, or costs for processing or otherwise complying with this request prior to any charges, fees, or costs being incurred or assessed. EWU Media LLC does not consent to the commencement of any work performed by the agency for processing or otherwise complying with this request that results in any charges, fees, or costs, including charges for labor, redactions, editing, storage devices, and the like, without EWU Media LLC's prior written approval of the estimate. |
| **Have you attached a photo id?** | |
| **Preferred Method to Receive Records** | Electronic via Records Center |
| **Clarifications Requested** | |

| | |
|---|---|
| **From:** | Weston Noyes |
| **To:** | AGGeneralCounsel |
| **Subject:** | Survey of Government Entities re: Public Records |
| **Date:** | Friday, September 25, 2026 10:57:13 AM |
| **Attachments:** | Outlook-rxtoaus0.png<br>Cody Maltzman Record Request Tracking.docx |

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**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello,

Attached is a recent example of a public records requests I deemed overbroad or unduly burdensome. This was identified to be AI generated. The document outlines the request and my response to each request.

Thank you,

**Weston Noyes**
*Humboldt County Comptroller / Auditor*
50 W. Fifth Street, Room 203
Winnemucca, NV 89445
Office: (775) 623-6467
Fax: (775) 623-6449



# 1.

# REQUEST from CM 07/05 11:52am

To the Humboldt County Public Records Officer / County Clerk,

Pursuant to the Nevada Public Records Act (NRS Chapter 239), I am writing to request access to and certified electronic copies of public records maintained by Humboldt County regarding the $5.9 million in federal American Rescue Plan Act (ARPA) funds utilized for groundwater rights retirement, as referenced in the recent Drake Rose & Associates fiscal audit.

Specifically, I am requesting the following records generated, received, or held between January 1, 2024, and the date of this request:

1. Title and Settlement Records: All closing statements, ALTA settlement sheets, escrow instructions, and disbursement ledgers from any private title company or escrow agent utilized to distribute the $5.9 million in ARPA funds for water rights purchases.
2. Chain of Custody and Financial Ledger: All internal county accounting entries, wire transfers, or unrecorded vouchers mapping the direct flow of federal funds from the county or federal accounts to the title company or subrecipients.
3. Transferor and Transferee Valuations: All contracts, deeds, and purchase agreements identifying the names of all sellers (transferors) of the groundwater rights, the specific basins/parcels involved, and the per-acre-foot price paid to each seller.
4. Procurement and Exemption Records: All documentation, board approvals, or internal memoranda justifying the bypass of open competition requirements for these federal funds, as flagged in the audit.
5. McDermitt GID Documentation: All contracts, wire transfers, and internal communications regarding the $101,794 pass-through to the McDermitt General Improvement District without a Unique Entity ID (UEI) number.

Per NRS 239.0107, you are required to respond to this request within five (5) business days. If this request is denied in whole or in part, please cite the specific statutory exemption justifying the withholding of each document. If there are fees associated with copying or scanning these electronic files, please notify me before fulfilling the request.

Thank you for your prompt cooperation in this matter of significant public interest.

Sincerely,

Cody Maltzman

775-304-6444

P.O. Box 28, paradise valley valley nv 89426

# RESPONSE from WN 07/06 4:45pm

Hello,

I am in receipt of your Public Records Request dated 07/05/2026. I am happy to provide the following documentation available to Humboldt County as requested. I felt inclined to provide clarifying information that I believe is pertinent to further support your request and the information provided.

1. **Title and Settlement Records:** All closing statements, ALTA settlement sheets, escrow instructions, and disbursement ledgers from any private title company or escrow agent utilized to distribute the $5.9 million in ARPA funds for water rights purchases.

   Attached are all of the records in which Humboldt County has record of which may pertain to request for title and settlement records. Humboldt County is only the fiscal agent of the Humboldt River Basin Water Authority and does not retain the records of the HRBWA.

   Draw 1 3.pdf
   Draw 2 3.pdf
   Draw 3 3.pdf
   Draw 4 3.pdf
   Draw 5 3.pdf
   Draw 6 3.pdf
   Draw 7 3.pdf
   Draw 7 4.pdf

2. **Chain of Custody and Financial Ledger:** All internal county accounting entries, wire transfers, or unrecorded vouchers mapping the direct flow of federal funds from the county or federal accounts to the title company or subrecipients

The audit finding resulted from the fact that the State issued payment for the groundwater rights directly to the title company rather than remitting the funds to Humboldt County for disbursement.

Because the County never received or processed the payment, the transaction was not initially recorded in the County's financial system, and therefore there is no transfer of funds, voucher, or related procurement documentation that exists within County records.

To correct this, the County subsequently recorded the transaction through an adjusting journal entry to ensure proper financial reporting. This correction is reflected through "Adjusting Journal Entries JE #60" on pages 8 and 15 of the attachment.

1. AUDITORS ADJUSTING ENTRIES FY25.pdf

3. **Transferor and Transferee Valuations:** All contracts, deeds, and purchase agreements identifying the names of all sellers (transferors) of the groundwater rights, the specific basins/parcels involved, and the per-acre-foot price paid to each seller

See request #1. Humboldt County is only the fiscal agent of the Humboldt River Basin Water Authority and does not retain the records of the HRBWA.

4. **Procurement and Exemption Records:** All documentation, board approvals, or internal memoranda justifying the bypass of open competition requirements for these federal funds, as flagged in the audit.

The purchase of water rights with federal funds is not subject to open competition requirements, because it is considered a real property acquisition, not a procurement activity, and therefore the federal competitive procurement rules in 2 CFR 200.317–200.327 as well as Nevada Revised Statute governing competitive solicitation (NRS 332.115) do not apply. Therefore, there is no "documentation, board approvals, or internal memoranda justifying the bypass of open competition requirements for these federal funds" as the purchase of water rights related to these funds are not subject to open competition.

The bypass of open competition requirements as you are referencing as "flagged in the audit" i.e. *Finding 2025-008 ARPA Coronavirus State and Local Recover Funds, ALN 21.027 Procurement, Suspension, and Debarment* pertains to separate ARPA funding which is being utilized to fund the Grass Valley Nitrate Mitigation Project. The engineer which was initially retained to provide services for the project was not competitively bid and as a result this is a finding that will continue until the

project is completed. Again, this finding is not related to the ARPA funding provided for the ground water rights retirement program.

5. **McDermitt GID Documentation:** All contracts, wire transfers, and internal communications regarding the $101,794 pass-through to the McDermitt General Improvement District without a Unique Entity ID (UEI) number.

   The Grass Valley Mitigation Project received federal funding from the state via ARPA 00844. These ARPA funds were designated to address the nitrate issues present in the grass valley area. An amendment was approved to also replace water meters across the county's water systems.

   The Humboldt County Board of Commissioners governs the Gold Country water system, the Star City water system, and the McDermitt General Improvement District which includes the McDermitt Water fund and the McDermitt Sewer fund.

   Therefore, the amendment to ARPA 00844 allowed the county to replace meters within the McDermitt water system.

   Bids were received and awarded to Four-Point engineering who replaced meters in both the Gold Country Water System and the McDermitt General improvement district.

   Once the work was completed by Four Point the initial invoice was paid for out of the County General Fund's ARPA 00844 expense account. It was later determined that this expenditure should have been split between the Gold Country Water Fund and the McDermitt General Improvement District.

   An accounting entry was performed to record the expenditure in the proper fund. This included $101,794 in meter replacements for the McDermitt Water System.

   Subsequently, the county was reimbursed for these expenditures under the grant and the respective revenue received as reimbursement for the meter replacements was deposited into the proper fund. This included $101,794 which was deposited as revenue received to the McDermitt Water fund.

   Per subrecipient monitoring guidelines the County did not provided notice to the Governing Board of the McDermitt Water fund which is the Humboldt County Board of Commissioners that the funds were being received. Which is a procedure that should have been followed to ensure subrecipient compliance. Therefore, creating the deficiency in controls.

   Outside of in person conversation there was no additional communication regarding these funds other than the email which I am providing. All other parties are no longer with Humboldt county and access to those communications are unavailable.

Attached is the email in which this item was discussed. Along with the contracts, bid documents, and journal entries regarding the $101,794 in question.

MCDW & GCW Fixed Asset Meter Replacements FY25.pdf
Inbox - Weston Noyes - Outlook.pdf
ViewSavedForms.pdf
Bid & Procurement Documents.pdf
Ammendment.pdf
2024Dec_ARPA0084_HC_FinalizedFundingAmendment.pdf
25May_DCNR_ARPA0844_Meter Project Confirmation Letter.pdf
25Jan_HumbCounty_MeterQuotes.pdf
25Jan_HumbCounty_MeterInstallation_FourPointEngineering_EntityInformation_20250102-083055.pdf
24Nov_HumbCounty_Meter Installation Bid Procurement Docs.pdf
24Dec_HumbCounty_Meter Installation Bids Received 1.pdf
24Dec_ARPA0084_HumboldtCounty_SignedFundingAmendment 2.pdf

## 2.

## REQUEST from CM 07/05 12:34pm

"Pursuant to the pending NPRA request filed on July 5, 2026, please include any and all written correspondence, management letters, preliminary drafts, and final findings transmitted between Drake Rose & Associates and the Humboldt County Comptroller’s Office regarding the Fiscal Year 2025/2026 audit."

Cody Maltzman

## RESPONSE from WN 07/06 4:56pm

Hello,

Per your request, I am writing to inform you that the Comptroller's office does not have any written correspondence, management letters, preliminary drafts, or final findings transmitted between Drake Rose & Associates regarding the Fiscal Year 2025/2026 audit.

Thank you,

# 3.

# REQUEST from CM 07/07 1:59pm

**TO:** Weston Noyes, Humboldt County Comptroller / Auditor

**RE:** IMMEDIATE AMENDMENT TO SUPPLEMENTAL NRS 239 DEMAND – Vendor Contracts
**DATE:** July 7, 2026

Mr. Noyes,

To ensure full production under the active NRS Chapter 239 public records demand sent earlier today regarding the $5.9M Groundwater Retirement Program, please include the following mandatory financial records in your office's 5-day statutory production window:

- **1. PRIVATE CONTRACTOR AGREEMENTS:** All independent contractor agreements, professional services contracts, and scopes of work executed between Humboldt County, the HRBWA, and Jeff Fontaine (or any private corporate entity or consultancy controlled by Fontaine) from January 1, 2023, to present.
- **2. VENDOR LEDGERS & IRS FORM 1099s:** All itemized vendor payment ledgers, claims approvals, disbursement vouchers, and IRS Form 1099 records detailing public funds paid to Jeff Fontaine as a private contractor while executing the duties of HRBWA Executive Director.

Because these financial records involve the direct expenditure of public funds by Humboldt County as the fiduciary host for this interlocal agency, they are immediate public records. A failure to produce these contracts or any attempt to withhold them under a claim of private vendor privilege will be documented as a willful violation of NRS 239.0107.

# RESPONSE from WN 07/07 3:33pm

Hello,
you will find my comments provided in response to your requests below. The records requested are detailed in my response and included as attachments to this email.
Thank you,
**Weston Noyes**
*Humboldt County Comptroller / Auditor*
50 W. Fifth Street, Room 203
Winnemucca, NV 89445
Office: (775) 623-6467
Fax: (775) 623-6449

**TO:** Weston Noyes, Humboldt County Comptroller / Auditor

**RE:** IMMEDIATE AMENDMENT TO SUPPLEMENTAL NRS 239 DEMAND – Vendor Contracts
**DATE:** July 7, 2026
Mr. Noyes,
To ensure full production under the active NRS Chapter 239 public records demand sent earlier today regarding the $5.9M Groundwater Retirement Program, please include the following mandatory financial records in your office's 5-day statutory production window:

- **1. PRIVATE CONTRACTOR AGREEMENTS:** All independent contractor agreements, professional services contracts, and scopes of work executed between Humboldt County, the HRBWA, and Jeff Fontaine (or any private corporate entity or consultancy controlled by Fontaine) from January 1, 2023, to present.

  Attached is the cooperative agreement establishing the HRWBA which states that the HRWBA has the authority to enter into contract and be contracted with. The County itself has not entered into any contract with the HRBWA or Mr. Fontaine, therefore, the County does not have any record of independent contractor agreements, professional service contracts, and scopes of work between the county, the HRBWA, and Jeff Fontaine other than what is established in the cooperative agreement.
- **2. VENDOR LEDGERS & IRS FORM 1099s:** All itemized vendor payment ledgers, claims approvals, disbursement vouchers, and IRS Form 1099 records detailing public funds paid to Jeff Fontaine as a private contractor while executing the duties of HRBWA Executive Director.

  Attached is a vendor history report which details all payments made to Vendor Jeffrey A Fontaine DBA. Nevada Authority Management, LLC. Including Payable Numbers, Payment Descriptions, Post Date, Payment Date, & Amount. Also attached is a copy of all 1099's issued to Jeffrey A Fontaine.

Because these financial records involve the direct expenditure of public funds by Humboldt County as the fiduciary host for this interlocal agency, they are immediate public records. A failure to produce these contracts or any attempt to withhold them under a claim of private vendor privilege will be documented as a willful violation of NRS 239.0107.
Sincerely
Cody Maltzman

# 4.
# Request from CM 07/07/26 1:43PM

TO: Weston Noyes, Humboldt County Comptroller / Auditor

RE: EXPANDED SUPPLEMENTAL NRS Chapter 239 PUBLIC RECORDS DEMAND
PROJECT: $5.9M+ Groundwater Retirement Program (Federal Davis-Bacon Compliance & Payroll Records)
DATE: July 7, 2026

Mr. Noyes,

I am writing to formally supplement my previous public records requests under the Nevada Public Records Act (NRS Chapter 239).

Your office previously confirmed in writing that the Comptroller's office *"does not have any written correspondence, management letters, preliminary drafts, or final findings transmitted between Drake Rose & Associates regarding the Fiscal Year 2025/2026 audit."*

To reconcile this admitted lack of a written audit trail with the $6,099,328.41 total federal allocation ($5.9M+ programmatic grant) for the HRBWA Water Right Retirement Program, demand is hereby made for the immediate inspection and electronic production of all primary federal labor, wage, and payroll compliance documents.

On April 6, 2024, HRBWA Executive Director Jeff Fontaine executed an electronic signature certifying absolute compliance with federal Davis-Bacon Act requirements and "Buy American" provisions to secure a $29,281.97 loan draw against the multimillion-dollar authorization. Under federal law (29 CFR § 5.5(a)(3)(ii) and 40 U.S.C. § 3145), any local government unit administering these funds must maintain weekly certified payroll records for all covered mechanics, laborers, field technicians, or contractors executing infrastructure and water right retirement monitoring operations.

Therefore, pursuant to NRS Chapter 239, please provide electronic copies of the following public records within five (5) business days:

- 1. CERTIFIED WEEKLY PAYROLL REPORTS (U.S. DOL FORM WH-347): All weekly certified payroll reports, wage statements, and fringe benefit logs submitted by prime contractors, subcontractors, or subrecipients utilizing, drawing from, or monitoring the $5,900,000+ Groundwater Retirement Program capital.

- 2. PREVAILING WAGE DETERMINATIONS: The specific U.S. Department of Labor General Wage Decisions incorporated into the bid solicitations, interlocal contracts, and grant subrecipient agreements for this project.
- 3. EMPLOYEE COMPLIANCE INTERVIEWS (STANDARD FORM 1445): All labor standards interview records, on-site inspection logs, and field check reports executed by Humboldt County or HRBWA personnel to verify Davis-Bacon compliance.
- 4. INDEPENDENT AUDITOR BILLING AND SCOPE AMENDMENTS: All itemized progress billings, contract engagement sheets, and scope-of-work modifications submitted by Drake Rose & Associates from January 1, 2024, to present, specifically referencing the testing or auditing of federal pass-through grants or Davis-Bacon compliance.
- 5. SUBRECIPIENT MONITORING LOGS & RECIPIENT MATRICES: All written documentation detailing the county's tracking of federal fund distribution to the Golconda Water District or any other water district, explicitly demonstrating the corrective actions taken to resolve the "significant deficiency" cited under Audit Finding 2024-007.

LEGAL NOTICE OF STATUTORY CONFLICT & LIABILITY EXPOSURE:
As the fiduciary, financial agent, and host county for the HRBWA, Humboldt County holds sole custody of these federal financial files. If your office asserts that these weekly certified payroll records and monitoring logs do not exist in written form, please state so explicitly in your response.

Be advised that a formal, written statement confirming the non-existence of these mandatory federal compliance documents will be utilized as *prima facie* evidence of continuous fiduciary malfeasance under NRS 281A, concrete validation of uncorrected Single Audit material weaknesses (Findings 2023-001 through 2024-007), and a direct misrepresentation of federal compliance by Executive Director Fontaine. Failure to produce these documents or to state their explicit non-existence will be treated as a willful violation of NRS 239.0107, exposing the County to immediate civil action, mandatory attorney fees, and statutory penalties.

Sincerely,

Cody Maltzman

## RESPONSE from WN 07/07 5:14pm

Hello,

Pursuant to NRS 239.0107, I am in receipt of your request and will provide a response in accordance with the provisions of NRS 239.0107 no later than the end of the fifth business day following the date of receipt.

Thank you,

## RESPONSE from WN 07/08 1:53 PM

Hello,

29 CFR § 5.5(a)(3)(ii) and 40 U.S.C. § 3145 do not apply to non-construction projects which would include water rights retirement. The signed certification (attached) is on a Nevada Infrastructure Finance System (NFIS) form that was used by the Nevada Department of Conservation and Natural Resources for their Nevada Water Conservation and Infrastructure Initiative which used ARPA funds for both infrastructure and non-infrastructure projects. Because these requirements do not apply there is no documentation related to items 1, 2, & 3 of your request. I have previously provided each of the draw requests submitted and approved by the Nevada Department of Environmental Protection in which any documents required would be filed.

4. Independent Auditor Billing and Scope Amendments:

See attached "Drake Rose Invoices FY25 Audit"

5. SUBRECIPIENT MONITORING LOGS & RECIPIENT MATRICES:

See attached "Corrective Plan of Action" page #4.

Thank you,

## REQUEST from CM 07/08 3:10pm

Mr. Noyes,

Thank you for clarifying that these funds originate from the Nevada Water Conservation and Infrastructure Initiative via federal ARPA SLFRF allocations.

While 29 CFR § 5.5(a)(3)(ii) governs construction labor, 2 CFR § 200 (Uniform Guidance) applies to all ARPA SLFRF expenditures, specifically regarding Subrecipient Risk Assessments (2 CFR § 200.332(b)) and Pre-Award Determinations.

Since you have pointed to a "Corrective Plan of Action" rather than executed logs, please clarify: Is it the official position of the Comptroller's Office that Humboldt County did not generate or maintain independent written Subrecipient Risk Assessments for the Paradise Valley Weed Control District's water retirement project prior to the execution of these ARPA draws?

Sincerely

Cody Maltzman

**RESPONSE from WN 07/08 3:10pm**

The Comptroller's Office does not assert that Humboldt County failed to generate or maintain the required Subrecipient Risk Assessment documentation.

# REQUEST from CM 07/08 3:53pm

Subject: RE: RE: Nevada Public Records Act Request – Subrecipient Risk Assessments

Mr. Noyes,

Thank you for that clarification. If it is the position of the Comptroller's Office that Humboldt County *did* generate and maintain the required Subrecipient Risk Assessment documentation for these ARPA/NFIS allocations, then those specific assessments are public records responsive to Item 3 of my active request.

Please provide the generated Subrecipient Risk Assessment documentation and pre-award determinations for this project within the statutory deadline.

If you possess these documents but are withholding them from production, please explicitly cite the specific Nevada Revised Statute (NRS) exemption that permits the Comptroller's Office to redact or withhold completed federal subrecipient risk assessments from a public records inspection.

Sincerely

Cody Maltzman

# RESPONSE from WN 07/08 4:29pm

Ms. Maltzman,

I want to ensure the Comptroller's Office provides the precise public records you are requesting within the timeframes required by NRS 239.0107. To do that, I need clarification on the scope of your request.

In your most recent correspondence, you referenced both:

• Subrecipient Risk Assessment documentation related to the Paradise Valley Weed Control District's water retirement project, and
• Item 3 of your original request: "Employee Compliance Interviews (Standard Form 1445), on-site inspection logs, and field check reports executed to verify Davis-Bacon compliance."

These are distinct categories of records, maintained differently and amongst different entities, and may not share the same naming conventions or documentation formats. To avoid any misunderstanding and to ensure I locate all responsive records, please clarify whether your use of "this project" refers to:

1. The Paradise Valley water retirement project's subrecipient risk assessment materials, or
2. The Davis-Bacon compliance documents listed under Item 3.

Because NPRA requires a government office to identify and produce records "with reasonable specificity," the Comptroller's Office must be able to clearly determine the exact documents you are requesting before a search can be completed. Your assistance in narrowing or precisely identifying the record types will help expedite the process and ensure accuracy.

If you prefer, I would be happy to schedule a meeting to review the scope of your active request's and ensure we are aligned on the specific records you seek.

Thank you,

## 5.

## REQUEST from CM 07/08 4:37pm

Mr. Noyes,

For your awareness, the Nevada State Controller's Office has reviewed this matter and confirmed that the relevant federal compliance records fall under the administrative jurisdiction of the Office of Federal Assistance (OFA) and the Governor's Finance Office (GFO).

As Humboldt County is the local recipient, these completed risk assessments and pre-award subrecipient tools are local public records subject to inspection under NRS 239. Please confirm whether your office possesses these files or if they must be subpoenaed directly from the state repositories.

## RESPONSE from WN 07/08 4:53pm

Please specify exactly which “completed risk assessments and pre-award subrecipient tools” you are referring to. You have submitted several separate requests, and in order to determine which records you are seeking and whether they are maintained by Humboldt County or another entity, I need clarification on the precise document or record type.

## REQUEST from CM 07/08 5:08pm

Subject: RE: RE: Nevada Public Records Act Request – Subrecipient Risk Assessments

Mr. Noyes,

To clarify, I am requesting the mandatory compliance records required under 2 CFR § 200.332(b) for evaluating each subrecipient's risk of noncompliance with federal statutes, regulations, and the terms and conditions of the subaward.

Specifically, this includes, but is not limited to:

The Form 010-GP 011 Pre-Award Risk Assessment (or the county-equivalent pre-award evaluation tool and risk-scoring sheets) used to assess subrecipients for the county's ARPA and NFIS grant fund allocations.

The Subrecipient Risk Assessment Questionnaires, financial internal control reviews, and prior audit history evaluations performed on the subrecipients before or during the award period.

The Risk Mitigation Plans and monitoring logs generated as a result of those risk assessments to determine the appropriate subrecipient monitoring under federal Uniform Guidance.

As Chief Deputy Controller James Smack of the State Controller's Office has advised that these specific compliance records fall under the parallel oversight of the Office of Federal Assistance (OFA) and the Governor's Finance Office (GFO), please confirm whether Humboldt County generated and maintains its local copies of these required files, or if they were never completed by your office.

Sincerely

Cody Maltzman

# 6.

# REQUEST from CM 07/08 3:02pm

**To:** Weston Noyes, Humboldt County Comptroller

Mr. Noyes,

Pursuant to the Nevada Public Records Act (NRS Chapter 239), please provide copies of the following public records within five (5) business days:

1. **UEI Activity Logs & Authorizations:** All internal authorizations, emails, and logs from January 1, 2024, to the present, permitting, managing, or tracking the use of Humboldt County's Unique Entity Identifier (UEI) by the Paradise Valley Weed Control District (PVWCD) for grant applications, submissions, or drawdowns.
2. **Direct Grant Awards & Ledgers:** All Notices of Grant Award (NOGA), grant agreements, and internal ledger entries for state or federal grants received directly by the PVWCD from Fiscal Year 2024 to the present.
3. **Subrecipient Monitoring & Agreements:** All executed subrecipient agreements, memoranda of understanding (MOUs), or monitoring checklists between Humboldt County and the PVWCD governing the oversight of federal or state pass-through funds.
4. **Commingling & Double-Dipping Controls:** All internal memos, email correspondence, or tracking spreadsheets generated by the Comptroller's office regarding the financial reconciliation of PVWCD direct revenues against the county's general ledger, specifically concerning the prevention of duplicate federal benefits or overlapping scopes of work.

If any portion of this request is denied, please cite the specific NRS exemption and provide a log of redacted or withheld items as required by law.

Sincerely,

Cody Maltzman

# RESPONSE from WN 07/08 4:41pm

Hello,

Pursuant to NRS 239.0107, I am in receipt of your request and will provide a response in accordance with the provisions of NRS 239.0107 no later than the end of the fifth business day following the date of receipt.

Thank you,

## RESPONSE from WN 07/13/2026 12:09pm

Hello,

1. The Paradise Valley Weed Control District is issued its own Unique Entity Identifier (UEI). The Comptroller's Office does not possess or maintain any internal authorizations, emails, or logs permitting, managing, or tracking the use of Humboldt County's UEI for PVWCD grant applications, submissions, or drawdowns. Therefore, no responsive records exist for this item. The active SAM.gov registration for the PVWCD's UEI is attached for reference.

2. The Comptroller's Office is not in receipt of any Notices of Grant Award (NOGA) or grant agreements issued directly to the Paradise Valley Weed Control District for FY 2024 to present. These documents, if they exist, may be maintained by the PVWCD. You may wish to contact the PVWCD directly for those records. A General Ledger Entry Detail Report showing all PVWCD ledger entries associated with state or federal grant revenues recorded in the County system from FY 2024 to present is attached. No other responsive records exist in the Comptroller's Office regarding direct grant awards received by PVWCD.

3. The Comptroller's Office does not possess any executed subrecipient agreements, memoranda of understanding (MOUs), monitoring checklists, or similar documents between Humboldt County and the Paradise Valley Weed Control District. No responsive record exists for this item.

4. The Comptroller's Office does not maintain internal memos, email correspondence, or tracking spreadsheets regarding the financial reconciliation of PVWCD direct revenues against the County's general ledger for commingling prevention or double

dipping controls. The comptroller's internal controls would provide prevention of commingling and double dipping. No responsive record exists for this item.

# 7.

## REQUEST from CM 07/09 10:40am

Mr. Noyes,

To clarify further based on official tracking from the State of Nevada, I am requesting the mandatory compliance files for the direct NEU ARPA award (Coronavirus Local Fiscal Recovery Fund) received by Humboldt County from the US Treasury in the amount of $3,269,224.

Specifically, please provide the completed Subrecipient Risk Assessments, Form 010-GP 011 equivalents, and risk-scoring sheets required under 2 CFR § 200.332 for the 40 different projects funded and managed locally by Humboldt County under this specific direct award allocation.

If Humboldt County failed to generate or maintain these mandatory federal monitoring records for these 40 projects, please explicitly state so in writing to satisfy this request.

## REPONSE from WN 07/13/2026 10:55am

Hello,

Attached are the subrecipient monitoring documents related to the projects administered under the referenced SLFRF funding. The listed provided references the corresponding subrecipient monitoring documents for each project.

Thank you,

# 8.

# REQUEST from CM 07/09 3:07pm

**Subject:** Nevada Public Records Act Request – Professional Services & Consulting Contracts (Gina Rackley)

To the Custodian of Records,

Pursuant to the Nevada Public Records Act (NRS 239), I am requesting an inspection and copies of all public records concerning professional services, consulting, or independent contractor agreements between Humboldt County and Gina Rackley (including any LLC, firm, or business entity under her operation or ownership).

Specifically, I am requesting:

1. All fully executed contracts, retainer agreements, and scopes of work for consulting or financial services provided by Gina Rackley to the Humboldt County Comptroller's Office or the County Commission from the date of her departure as Comptroller to the present.
2. All itemized invoices, billing sheets, timesheets, and description-of-services logs submitted by Gina Rackley for payment.
3. All county vendor disbursement ledgers, check registers, and warrants showing the total public funds paid to her or her entity during this timeframe.

Please provide these records within the statutory 5-day window. If fees apply or redacts are made, please notify me with the specific NRS citations.

Sincerely,

# RESPONSE from WN 07/13/2026 12:19pm

Hello,

1. See attached agreement"Rackley-HuCo_01202026 executed 01212026.pdf"
2. See attached Invoices
3. See attached Vendor History Report and Check Report.

**From:** Unclaimed Property
**To:** Danielle Anthony
**Subject:** Fw: PUBLIC RECORDS REQUEST & FEDERAL-COMPLIANCE NOTICE/DECLARATION AND AFFIDAVIT UNDER PENALTY OF PERJURY SUBMISSION TYPE: Breach of Fiduciary Duty, Paradox of Globalization, and Non-Waiver of Rights
**Date:** Monday, May 11, 2026 10:54:16 AM
**Attachments:** Outlook-hgj3gcis.png

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Good morning

This is a public record request.

Lisa G

**Helpful Claims Resources**:

| | |
|---|---|
| Claims FAQs: | https://www.nvup.gov/app/faq-claim |
| Claims Guide: | https://www.nvup.gov/app/claim/how-to-search |
| Search for Property: | https://www.nvup.gov/app/claim-search |
| Upload Documentation: | https://www.nvup.gov/app/claim-doc-upload |
| Check the Status of your Claim: | https://www.nvup.gov/app/claim-status-search |

Best Regards,
Unclaimed Property
www.NVUP.gov
800-521-0019 (Toll Free/ Only in NV outside of Las Vegas Area)
Phone: 702-486-4140 (Option 2 for Claims)
Fax: 702-486-4177



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---

**From:** David <lvsms.2006@gmail.com>
**Sent:** Saturday, May 9, 2026 4:09 PM
**To:** Hailey Foster <HFoster@dmv.nv.gov>; Paolo David <PDavid@dmv.nv.gov>; Nevada Holder <nvholder@nevadatreasurer.gov>; Unclaimed Property <UnclaimedProperty@nevadatreasurer.gov>; Unclaimed Help

<UnclaimedHelp@nevadatreasurer.gov>; Andy Matthews <amatthews@sco.nv.gov>; GTO - Service Desk <servicedesk@it.nv.gov>; CIO <CIO@it.nv.gov>; AGRECORDSREQ <agrecordsreq@ag.nv.gov>; AGGeneralCounsel <AGGeneralCounsel@ag.nv.gov>; JUDInterim@lcb.state.nv.us <JUDInterim@lcb.state.nv.us>; judicialed@nvcourts.nv.gov <judicialed@nvcourts.nv.gov>; nvscclerk@nvcourts.nv.gov <nvscclerk@nvcourts.nv.gov>; legal@switch.com <legal@switch.com>; responsibleinvestment@digitalbridge.com <responsibleinvestment@digitalbridge.com>; david.kennedy@kelmarassoc.com <david.kennedy@kelmarassoc.com>; SantaBarbaraSupport@avenuinsights.com <SantaBarbaraSupport@avenuinsights.com>; upch.custody@avenuinsights.com <upch.custody@avenuinsights.com>; kingwolf@aol.com <kingwolf@aol.com>; Zach Conine <StateTreasurer@nevadatreasurerj.gov>; zach@zachconine.com <zach@zachconine.com>

**Subject:** PUBLIC RECORDS REQUEST & FEDERAL-COMPLIANCE NOTICE/DECLARATION AND AFFIDAVIT UNDER PENALTY OF PERJURY SUBMISSION TYPE: Breach of Fiduciary Duty, Paradox of Globalization, and Non-Waiver of Rights

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

PUBLIC RECORDS REQUEST & FEDERAL-COMPLIANCE NOTICE

Submitted Pursuant to NRS 239, NRS 120A, NRS 481.063, NRS 353, NRS 360, NRS 408, SB 404 (2025), AB 55 (2023), and Federal Oversight Authorities (Treasury OIG, FinCEN, CFPB, FTC)

To:
Nevada Department of Motor Vehicles – Records Section
Nevada Department of Taxation
Nevada State Treasurer – Unclaimed Property Division
Nevada State Controller's Office
Nevada Department of Administration – Enterprise IT Services (EITS)
Nevada Attorney General's Office
Nevada Judiciary (EJDC, AOC)
Nevada Department of Health & Human Services (for SEFA-linked programs)
Any Nevada agency hosting systems or data in Switch / DigitalBridge / IFM / SoftBank facilities
Any third-party vendor performing identity-matching, adjudication, insurance-lapse automation, probate-related automation, or unclaimed-property processing (including Kelmar, Avenu/Neumo, Kroll, FAST, APEARS-style systems, Cross Country Computer, Discovery Audit Services, and any subcontractors)

From:
David Lee Nace (Dave)
Las Vegas, Nevada
Email: [redacted]
Date: May 2026

## I. PURPOSE OF REQUEST

This request seeks non-exempt public records relating to:

1. Automated insurance-lapse systems, identity-matching algorithms, and decision-automation used by Nevada agencies or their vendors.
2. Probate and unclaimed-property administration, including changes under SB 404 (2025) and AB 55 (2023–2024).
3. Federal-funds compliance, including SEFA reporting, 2 CFR 200 internal-control requirements, and any automated processes that may rename, reclassify, or divert federal funds.
4. Custodianship, hosting, and data-sovereignty risks involving Switch → DigitalBridge → IFM → SoftBank.
5. Identity-matching systems (DMF, LADMF, fuzzy-matching, APEARS-style systems) used in insurance, probate, tax, or unclaimed-property determinations.
6. Vendor-controlled adjudication, including automated denials, lapse determinations, probate triggers, or abandonment determinations.

This request is made under NRS 239, with federal-compliance implications under:

- 2 CFR 200.302–303 (financial management & internal controls)
- False Claims Act (31 U.S.C. §§ 3729–3733)
- FCRA (15 U.S.C. § 1681)
- Identity Theft Red Flags Rule (16 CFR 681)
- DMF/LADMF access restrictions (Bipartisan Budget Act §203)
- 14th Amendment Due Process (automated deprivation of property)

## II. RECORDS REQUESTED

Below is the structured list of records sought from all agencies and vendors.

### A. Automated Insurance-Lapse Systems (NV LIVE & related modules)

Provide:

1. System architecture diagrams (C4, data-flow, sequence diagrams).
2. Switch-hosted component inventories (software, databases, APIs, microservices).
3. Vendor contracts, SLAs, hosting locations, and data-sovereignty disclosures.
4. Algorithmic decision rules for lapse determinations, including:
   - Rule-based logic
   - ML-based scoring
   - Thresholds, weights, and version histories
5. Explainable AI documentation (feature importance, counterfactuals, auditability).
6. Human-in-the-loop controls, including jurisdictions prohibiting fully automated adverse decisions.

7. Error-rate reports, false-positive logs, and root-cause analyses.
8. Audit trails (time-stamped logs, actor IDs, data-change histories).
9. Validation records (accuracy, precision, recall, F1, bias testing).

B. Probate-Related Automation (SB 404 – Effective Oct 1, 2025)

Provide:

1. Any automated systems used to:• Identify estates
• Trigger probate actions
• Identify heirs
• Prioritize administrators (including new SB 404 hierarchy)

2. Any identity-matching algorithms used to link decedents to property.
3. Any automated valuation or "fast-track" sale triggers.
4. All vendor contracts or software used in probate-related automation.
5. All communications referencing "equity strippers," third-party investors, or SB 404 compliance.

C. Unclaimed Property (NRS 120A / AB 55)

Provide:

1. Algorithms used to determine abandonment, including:• Removal of RPO trigger
• Accelerated abandonment timelines
• IRA abandonment logic

2. Identity-matching systems (DMF, LADMF, fuzzy-matching, APEARS-style).
3. Vendor contracts (Kelmar, Avenu/Neumo, Kroll, Cross Country Computer, etc.).
4. Automated denial logs, including identity-fragmentation issues.
5. Data-routing and hosting logs, including Switch-hosted components.
6. Auction records for safe-deposit-box contents.
7. Fee-limitation compliance under NRS 120A.740 (10% cap).

D. Federal-Funds / SEFA Compliance (2 CFR 200)

Provide:

1. Any automated processes that rename, reclassify, or re-identify federal funds.
2. Any identity-matching algorithms used to determine:• Eligibility
• Lapse
• Abandonment
• Probate triggers

3. All internal-control documentation required under 2 CFR 200.302–303.
4. All SEFA reconciliation records involving DMV, Taxation, Treasurer, Controller, or vendors.
5. Any communications referencing:• “Synthetic identities”
• “Fuzzy matches”
• “Automated lapse”
• “Reclassification of federal funds”

6. Any records relating to reverse-false-claims exposure under 31 U.S.C. §3729(a)(1)(G).

E. Identity-Matching Algorithms (All Agencies & Vendors)

Provide:

1. Documentation for:• Levenshtein distance
• Jaro-Winkler
• Soundex / Metaphone
• N-gram / cosine similarity
• Dice coefficient
• APEARS-style matching

2. Any use of SSA DMF or LADMF, including:• Certification documents
• Access logs
• Permitted-use statements

3. Any evidence of:• False death matches
• Misidentification
• Identity fragmentation
• Automated adverse actions

F. Switch / DigitalBridge / IFM / SoftBank Hosting & Custodianship

Provide:

1. All colocation agreements and hosting contracts.
2. Rack assignments, tenancy records, and data-routing logs.
3. Vendor-to-vendor data-transfer logs.
4. Any CFIUS-related assessments or foreign-ownership disclosures.
5. Any records identifying the actual custodian of operational logs, metadata, or system-level records.

III. FORMAT OF PRODUCTION

Please produce all records in native electronic format, including:

• PDFs
• CSV / XLSX
• JSON
• System logs
• Architecture diagrams
• Contracts and amendments
• Emails and internal memos

If any records are withheld, provide a privilege log citing the specific exemption under NRS 239.0107.

IV. FEE WAIVER REQUEST

A fee waiver is requested because:

• The records concern statewide fiduciary systems.
• The information is necessary for public oversight.
• The request is not for commercial use.
• The records relate to billions in public funds and statutory changes affecting all Nevadans.

V. FEDERAL-COMPLIANCE NOTICE (Treasury OIG, CFPB, FTC, FinCEN)

This request places all agencies and vendors on notice that:

1. Automated identity-matching or lapse systems may implicate:• 2 CFR 200 internal-control failures
• FCRA accuracy requirements
• Red Flags Rule identity-theft obligations
• DMF/LADMF misuse penalties
• False Claims Act reverse-false-claims liability

2. Probate and unclaimed-property automation must comply with SB 404, AB 55, and NRS 120A.
3. Federal funds may not be renamed, reclassified, or diverted through algorithmic processes.
4. Foreign-owned hosting environments (Switch → DigitalBridge → IFM → SoftBank) raise custodial-integrity concerns relevant to Treasury OIG and FinCEN.

VI. DELIVERY

Please deliver electronically to:
[redacted]

VII. CLOSING

Please confirm receipt and provide the estimated date of completion pursuant to NRS 239.0107(1)(c).

Respectfully,
David Lee Nace
Las Vegas, Nevada

DECLARATION AND AFFIDAVIT UNDER PENALTY OF PERJURY

Breach of Fiduciary Duty, Paradox of Globalization, and Non-Waiver of Rights

Submitted in Good Faith to the U.S. Department of the Treasury OIG, FinCEN, CFPB, and FTC

On Behalf of Myself and Approximately 3.3 Million Nevada Residents Not Receiving Protected Benefits

I, David Lee Nace, declare under penalty of perjury under the laws of the United States and the State of Nevada that the following is true and correct to the best of my knowledge, information, and belief.

This declaration is submitted as a good-faith fiduciary-risk disclosure to federal oversight bodies, and as part of the public record, due to persistent fiduciary-duty breaches, structural conflicts of interest, and the absence of corrective action by institutions within Nevada, including:

• State Bar of Nevada – which has taken no meaningful action despite clear fiduciary-oversight implications involving public-trust systems, vendor governance, and attorney-regulated entities.
• ACLU of Nevada – which has not intervened despite systemic due-process, data-sovereignty, and property-rights concerns affecting millions of residents.

This declaration is submitted on behalf of myself and the approximately 3.3 million Nevada residents who are not NVPERS/JRS beneficiaries, not third-party vendors, and who receive no financial or structural benefit from the systems and decisions described herein.

I. PURPOSE OF THIS DECLARATION

This affidavit seeks federal review, clarification, and oversight regarding:

1. Custody, control, and handling of public funds and financial instruments within Nevada, including unclaimed property, court-registry funds, and federally influenced financial systems.
2. Cross-border data-custody risks arising from foreign-influenced infrastructure providers (Switch → DigitalBridge → IFM → SoftBank).
3. Vendor-driven risks to AML/KYC compliance, consumer protection, and federal-funds integrity.
4. Systemic fiduciary-duty breaches by Nevada agencies and contracted vendors.
5. The absence of intervention by the State Bar of Nevada and ACLU of Nevada despite clear public-interest implications.
6. Harm to the non-pensioned majority of Nevada residents, who bear the risks but receive none of the protected financial benefits.

This is not an allegation of criminal conduct.
It is a fact-based fiduciary-risk disclosure supported by state audits, federal case law, public filings, and Nevada's own administrative records.

## II. EXECUTIVE FINDINGS (FACT-BASED)

### 1. Globalized Custody of Nevada Public-Trust Systems

Nevada's public-trust data—including financial instruments, unclaimed property, court-registry funds, and identity-verification systems—is now hosted within a foreign-influenced ownership chain:

• Switch → DigitalBridge → IFM Investors → SoftBank Group (Japan)

This occurred without public disclosure, public consent, or legislative risk assessment, creating:

• Loss of custodial clarity
• Cross-border data-sovereignty risks
• Potential conflicts with federal custodial-integrity standards (Treasury OIG, FinCEN, GLBA, GDPR-triggering conditions)

### 2. Unclaimed-Property System Risks

Nevada holds over $1 billion in unclaimed property. Vendor practices documented in federal courts—particularly involving Kelmar Associates—include:

• "Shocking the conscience" audit behavior
• "Pernicious incentives" to inflate liability

• Retroactive penalties
• Multi-state data sharing without adequate safeguards

These practices implicate:

• FinCEN AML/KYC standards
• FTC unfair/deceptive practices authority
• CFPB consumer-financial-protection mandates
• Treasury OIG custodial-integrity oversight

3. Regulatory Commingling & Structural Conflicts

Switch's client list shows simultaneous hosting of:

• Courts
• Law enforcement
• Gaming regulators
• Gaming operators
• Utilities
• Hospitals
• Financial institutions

This violates global norms for:

• Regulatory independence (IOSCO Principles 1–5)
• Custodial segregation (Basel III)
• Market-integrity protections (FSB Key Attributes)

4. Misallocation of Federal Funds

Nevada receives $7.8–$10.8 billion annually in federal funds yet ranks:

• 48th–51st in education
• 51st in mental health
• 47th in child well-being
• Last in affordable housing

This pattern indicates:

• Structural misallocation
• Vendor capture

• Administrative overhead dominance
• Failure of fiduciary stewardship

5. Inaction by the State Bar of Nevada and ACLU of Nevada

Despite:

• Documented fiduciary-duty breaches
• Public-records failures
• Vendor-controlled infrastructure
• Due-process risks in automated systems
• Identity-matching errors affecting property rights

Neither institution has intervened, issued public guidance, or initiated systemic review.

This inaction leaves 3.3 million non-beneficiary Nevadans without institutional representation or protection.

III. PARADOX & NON-WAIVER CLAUSES

1. Non-Waiver of Rights

I do not waive:

• Constitutional rights
• Statutory rights
• Property rights
• Privacy rights
• Financial rights
• Data-sovereignty rights
• Rights under U.S. and Nevada law
• Rights under international human-rights and data-protection norms

This declaration is self-executing and applies to all Nevada public agencies, vendors, contractors, and foreign-affiliated entities involved in the custody or processing of Nevada residents' data or financial instruments.

2. Paradox of Globalization Without Consent

Nevada residents are required to comply with:

• Globalized data-custody systems

• Vendor-controlled financial-instrument systems
• Automated decision systems (insurance lapse, probate, unclaimed property)
• Foreign-influenced infrastructure

Yet Nevadans were never informed, never consulted, and never allowed to consent.

This violates:

• The doctrine of informed consent
• The duty of good faith and fair dealing
• Fiduciary duties of loyalty, care, and transparency
• Nevada constitutional guarantees
• International standards for data protection and financial-market integrity

## IV. FORMAL DECLARATION OF BREACH

I declare that Nevada public officials, agencies, and vendor-aligned entities have breached their fiduciary duties of:

• Loyalty
• Care
• Transparency
• Good faith

This breach is demonstrated by:

• Globalization of Nevada data without disclosure
• Foreign-influenced custodianship of public-trust systems
• Vendor capture of regulatory and financial infrastructure
• Misallocation of billions in federal funds
• Aggressive seizure of unclaimed property
• Structural conflicts of interest
• Inaction by the State Bar of Nevada and ACLU of Nevada
• Neglect of the 3.3 million Nevadans outside the pension/vendor ecosystem

## V. REQUEST FOR FEDERAL REVIEW

I respectfully request that:

Treasury OIG

Review custodial practices for unclaimed property, court-registry funds, and vendor-managed

financial instruments.

FinCEN

Assess AML/KYC risks arising from vendor-managed systems and foreign-influenced data-center ownership.

CFPB

Evaluate consumer-financial-data risks, identity-matching errors, and automated property-lapse determinations.

FTC

Investigate unfair/deceptive practices and misrepresentation of data-custody risks.

- 

VI. EXECUTION

I declare under penalty of perjury that the foregoing is true and correct.

Executed this day,
David Lee Nace (Dave)
Henderson, Nevada
May 2026
Email: [redacted]
Petitioner – NV-SEFA-001

---

David Lee Nace

**From:** Unclaimed Property
**To:** Unclaimed Property
**Cc:** Unclaimed Property
**Subject:** RE: Nevada State Treasurer — Expanded Public Records Request (NRS 239) Primary Trust-Fund & Prudent Investor Standard Request Aligned with Federal Referral Packet (DOJ/OIG, Treasury OIG, IRS-CI, GAO, SEC/FINRA)
**Date:** Monday, September 14, 2026 9:25:58 AM
**Attachments:** image001.png

---

Good Day,

Our office is in receipt of the below and will respond within 30 days.

**Helpful Claims Resources**:

| | |
|---|---|
| Claims FAQs: | https://www.nvup.gov/app/faq-claim |
| Claims Guide: | https://www.nvup.gov/app/claim/how-to-search |
| Search for Property: | https://www.nvup.gov/app/claim-search |
| Upload Documentation: | https://www.nvup.gov/app/claim-doc-upload |
| Check the Status of your Claim: | https://www.nvup.gov/app/claim-status-search |

Best Regards,
Unclaimed Property
www.NVUP.gov
800-521-0019 (Toll Free/ Only in NV outside of Las Vegas Area)
Phone: 702-486-4140 (Option 2 for Claims)



"This communication, including any attachments, may contain confidential information and is intended only for the individual or entity to which it is addressed. Any review, dissemination or copying of this communication by anyone other than the intended recipient is strictly prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and delete all copies of the original message."

---

**From:** David [redacted]>
**Sent:** Thursday, September 10, 2026 5:30 AM
**To:** General Counsel Office <generalcounseloffice@lcb.state.nv.us>; Ian Carr <icarr@nvpers.org>; US Govt Accountability Office Fraudnet <youngc1@gao.gov>; oig.hotline@usdoj.gov <oig.hotline@usdoj.gov>; Unclaimed Property <UnclaimedProperty@nevadatreasurer.gov>
**Subject:** Nevada State Treasurer — Expanded Public Records Request (NRS 239) Primary Trust-Fund & Prudent Investor Standard Request Aligned with Federal Referral Packet (DOJ/OIG, Treasury OIG, IRS-CI, GAO, SEC/FINRA)

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

David Lee Nace
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Nevada State Treasurer — Expanded Public Records Request (NRS 239)

Primary Trust-Fund & Prudent Investor Standard Request

Aligned with Federal Referral Packet (DOJ/OIG, Treasury OIG, IRS-CI, GAO, SEC/FINRA)

From:
David Lee Nace
[redacted]

To:
Nevada State Treasurer's Office
Attn: Records Officer
unclaimedhelp@nevadatreasurer.gov
tmathiscoleman@nevadatreasurer.gov

---

I. Statutory Basis for Request

This request is made pursuant to NRS Chapter 239, Nevada's Public Records Law.
All requested materials are administrative records, not legislative acts, and therefore not subject to legislative immunity.

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II. Time Period Covered

Fiscal Years 2018 through 2026, inclusive.

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III. Requested Records (Expanded & Strategically Sequenced)

These categories are structured to expose fiduciary breaches, conflicts of interest, and systemic control failures — while appearing routine.

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1. Prudent Investor Standard Compliance Documentation

Requesting all records demonstrating compliance with NRS 164.715–164.720, including:

- Prudent Investor compliance analyses
- Investment-policy statements
- Risk-assessment worksheets
- Liquidity-management analyses
- Portfolio-allocation rationale
- Documentation of economic-condition considerations
- Tax-consequence evaluations
- Records showing diversification decisions

Strategic purpose:
If these records exist → they prove knowledge and intent.
If they do not → they prove breach of fiduciary duty.

---

2. Investment Strategy Memoranda & Committee Records

Requesting all internal and external investment-strategy documentation:

- Investment strategy memoranda
- Committee minutes
- Voting records
- Portfolio-rebalancing plans
- Asset-allocation models
- Communications with investment advisors
- Draft versions of investment-policy changes

Strategic purpose:
Drafts reveal intent, knowledge, and internal disagreements.

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3. Custodial-Bank Agreements & Indemnification Clauses

Requesting all agreements governing custody of trust-fund assets:

• Custodial-bank agreements
• Amendments, riders, and addenda
• Indemnification clauses
• Delegation-of-authority provisions
• Retroactive-date disclosures
• Prior-knowledge exclusions
• Cyber/privacy exclusions

Strategic purpose:
Insurance exclusions reveal:

• improper delegation
• foreign-influenced custody
• fiduciary exposure
• indemnification gaps

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4. Vendor Insurance Certificates & Additional-Insured Documentation

Requesting all insurance documentation naming the Treasurer or State of Nevada as insured:

• Vendor insurance certificates
• Additional-insured endorsements
• Riders and amendments
• Liability-cap disclosures
• Retroactive-date limitations

• Prior-knowledge exclusions

Strategic purpose:
If exclusions exist → they prove known risk.
If documentation is missing → they prove non-compliance.

---

5. Communications with External Auditors (State, County, Federal)

Requesting all communications with:

• State auditors
• County auditors
• City auditors
• Federal auditors (Treasury, GAO, OIG)
• Private audit firms

Including:

• Draft audit findings
• Auditor inquiries
• Deficiency notices
• Requests for clarification
• Management-response drafts
• Records of unresolved issues

Strategic purpose:
Drafts = knowledge and intent.
Missing drafts = audit obstruction.

---

6. Internal Compliance Logs & Verification Sheets

Requesting all routine administrative compliance records:

• Internal compliance logs
• Daily/weekly/monthly verification sheets
• Checklists used to confirm fiduciary obligations
• Logs documenting trust-fund handling
• Logs documenting custodial-chain integrity

Strategic purpose:
If logs exist → they prove knowledge.
If logs don't exist → they prove negligence.

---

7. Conflict-of-Interest Disclosures & Recusal Records

Requesting all records documenting conflicts or recusals:

• Conflict-of-interest disclosures
• Recusal statements
• Determinations of conflict
• Communications regarding conflict management
• Records identifying "disinterested" personnel

Strategic purpose:
If conflicts exist → they admit conflicts.
If conflicts don't exist → they admit failure to disclose.

---

8. Records Identifying Data-Integrity or Identity-Fragmentation Issues

Requesting all records identifying:

• "UNKNOWN UNKNOWN NV 00000" identity placeholders
• fragmented identity profiles
• data-integrity failures
• remediation plans
• internal warnings or alerts

Strategic purpose:
Identity fragmentation is a federal identity-integrity violation.

---

IV. Preferred Format

Electronic copies (PDF, searchable digital format).
If fees apply, please provide an estimate before processing.

---

V. Purpose of Request

This request supports ongoing documentation of:

- fiduciary compliance,
- trust-fund integrity,
- custodial-chain governance,
- audit-trail reconstruction,
- conflict-of-interest management,
- and systemic administrative controls

for submission to DOJ/OIG, Treasury OIG, IRS-CI, GAO, SEC/FINRA, and other federal oversight bodies.

---

VI. Certification & Response Requirements

Under NRS 239.0107, denials must include:

- specific legal basis,
- name and title of deciding official,
- description of withheld materials.

---

VII. Request for Confirmation

Please confirm receipt and provide an estimated timeline for fulfillment.

**From:** Brady Phillips
**To:** AGGeneralCounsel
**Subject:** Task Force - Public Records
**Date:** Tuesday, September 22, 2026 3:09:17 PM
**Attachments:** image001.png
image002.png

---

Good afternoon,

I have responded to the request via the online form.

We do not have a fee schedule to provide.

The requests that are overly broad that OPM has received, requiring lengthy redaction periods include:

NVIndy – "Under the Nevada Open Records Act § 239 et seq., I am requesting an opportunity to inspect or obtain copies of the following records:
1. The number of staff turnover by month since January 2024 until the present day, July 22, 2025, in the governor's finance office and the office of project management.
2. Minutes from the executive committee meetings from September 2023 to the present day, July 22, 2025.
3. Minutes from the governance committee meetings from December 2024 to the present day, July 22, 2025.
Please get in touch with me with information about when I can expect to receive copies or the opportunity to inspect the requested records. I ask that the records be provided as they become available and that a copy of the requested records be made available in digital format. I am a journalist with The Nevada Independent, and this request is made as part of newsgathering. If you expect the cost for providing these documents will exceed $25, please contact me before proceeding. Please call me if you have any questions or modification suggestions. If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information. Please let me know if you have any questions or need any clarification. Thank you for handling my request."

- These records were provided following a nearly 3 month review and redaction period.

NVIndy – "To whom it may concern, Under the Nevada Open Records Act, I am requesting an opportunity to inspect or obtain copies of the following records from the Office of Project Management - All emails sent by employees of the Office of Project Management to employees of the Nevada State Controller's Office and Governor's Finance Office related to the Core.NV project from Oct. 1, 2024 to Jan. 17, 2025. If access to the records I am requesting will take longer than a reasonable amount of time, please contact me with information about when I might expect copies or the ability to inspect requested records. If possible, I am requesting a copy of the requested record be provided in a digital format. If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information. Please let me know if you have any questions or need any clarification."

- This request was eventually narrowed in scope by the requester and then eventually abandoned following an extensive timeline to review the large volume of emails for confidential information prior to release. The requestor lost interest in the records, yet the State wasted many hours on review prior to this cancellation of the request.

NVIndy – "Under the Nevada Open Records Act, I am requesting an opportunity to inspect or obtain copies of the following records from the Office of Project Management - All emails sent by employees of the Office of Project Management since Jan. 2024 with the phrases "Nevada Department of Transportation", "NDOT", or "transportation." If access to the records I am requesting will take longer than a reasonable amount of time, please contact me with information about when I might expect copies or the ability to inspect requested records. If possible, I am requesting a copy of the requested record be provided in a digital format. If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information. Please let me know if you have any questions or need any clarification."

- This request was eventually abandoned by the requester after I advised the response of documents was determined to be over 95,000 records in length; and following my estimated timeline the State would require to evaluate any confidential concerns within these records prior to release. The State wasted minimal time on this request, as a learning point from the above request was to confirm the requestor's continued interest immediately after identifying the number records and timeline for disclosure.

Please advise if you need anything additional.

**Brady Phillips**
*Administrator*
GFO-OPM |
3850 Arrowhead Drive
Carson City, NV 89706
BradyP@opm.nv.gov
(775) 687-7233 – Office

To learn more about CORE.NV visit CORE.NV Statewide Communications - Home (sharepoint.com)

This communication, including any attachments, may contain confidential information and is intended only for the individual or

entity to whom it is addressed. Any review, dissemination, or copying of this communication by anyone other than the intended recipient is strictly prohibited. If you are not the intended recipient, please contact the sender by reply Email, then delete and destroy all copies of the original message.

**From:** J
**To:** AGRECORDSREQ
**Subject:** Public records request
**Date:** Friday, January 2, 2026 9:29:49 AM

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**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Greetings,

Pursuant to the Nevada Public Records Act (NRS Chapter 239), I respectfully request access to the following public records maintained by the Office of the Nevada Attorney General, Constituent Services Unit.

**Requested Records**

For calendar year **January 1, 2025 through December 31, 2025**, please provide an electronic list, table, or export of complaint intake records ("trouble tickets" or equivalent), limited to the following **administrative metadata fields only**, to the extent such fields are maintained:

1. Case or ticket number
2. Date the case/ticket was opened or created
3. Case description title, subject line, or brief categorical label
4. Name of the agency or entity identified in the complaint (if a distinct field exists)
5. Complaint category or type (if coded or categorized)

**Scope Clarifications**

- This request does **not** seek complaint narratives, evidence, investigative notes, staff communications, legal analysis, or dispositions.
- I am requesting only **index-level or intake-level metadata**, comparable to a case log or docket.
- If any individual field is exempt, please provide the remaining non-exempt fields with that field redacted.
- I am willing to accept the records **in the format in which they are ordinarily maintained**, including CSV, Excel, or similar electronic form.

**Legal Basis**

Administrative indexes or logs identifying the existence of records constitute public records under NRS 239.010. This request does not seek investigative or deliberative material and therefore should not implicate law-enforcement or attorney-client exemptions. Redaction, rather than withholding, is appropriate where limited exemptions may apply.

If you contend that any portion of this request is exempt, please identify the specific statutory basis for each exemption as required by NRS 239.0107(1)(d), and release all reasonably segregable non-exempt information.

Please acknowledge receipt of this request and advise of any reasonable costs, if applicable, prior to processing.

Thank you for your attention.

J.Gumz

SIDLEY

June 10, 2024

**By Email: agrecordsreq@ag.nv.gov**

Public Records Coordinator
555 E. Washington Ave., Suite 3900
Las Vegas, NV 89101
Telephone: 702-486-3420
Fax: 702-486-3768

Re: Public Records Requests

Dear Sir/Madam:

Pursuant to N.R.S. 239 et seq., I am requesting copies of the following information:

1. All contracts, retainer agreements, or engagement letters with the Nevada Attorney General's Office and outside counsel, including Hagens Berman Sobol Shapiro LLP ("Hagens Berman"), Cohen Milstein Sellers & Toll PLLC ("Cohen Milstein), Motley Rice LLC ("Motley Rice"), or Lieff Cabraser Heimann & Bernstein, LLP ("Lieff Cabraser"), related to legal services.

2. All communications and records of communications, including contracts, retainer agreements, or engagement letters, with, or concerning, outside counsel, including Hagens Berman, Cohen Milstein, Motley Rice, or Lieff Cabraser, and any member of Nevada Attorney General's Office regarding antitrust, consumer protection, or consumer fraud.

3. All communications and records of communications with, or concerning, outside counsel, including Hagens Berman, Cohen Milstein, Motley Rice, or Lieff Cabraser, and any member of Nevada Attorney General's Office regarding any current or potential litigation that could be brought by outside counsel on behalf of or in concert with the Nevada Attorney General's Office.

4. All records, including communications, regarding any gifts, contributions, or donations from outside counsel, including Hagens Berman, Cohen Milstein, Motley Rice, or Lieff Cabraser, to any member of the Attorney General's Office.

5. All surveys or other consumer research related to signing up or cancelling an online subscription service, membership, or product.

The timeframe for these requests is January 1, 2022 to the present. The term "records" as used in these requests includes, but is not limited to, papers, instruments, data, documents, reports, presentations, memoranda, analyses, studies, tests, surveys, research, communications, agreements, employee notes, meeting notes, transcripts, and other documentary evidence, whether in paper form or stored on audiotape, videotape, computer, electronic, magnetic, or any other

media, and whether or not shared with third parties. The term "communications" as used in the preceding sentence includes, but is not limited to, correspondence, emails, letters, faxes, and messages of any kind, including text, voicemail, video, or other electronic messages, whether or not shared with third parties. The term "outside counsel" as used in these requests, includes, but is not limited to, any lawyer or private law firm retained by the State of Nevada, including Hagens Berman, Cohen Milstein Sellers & Toll PLLC, Motley Rice LLC, Gallagher & Kennedy, P.A., Ruttenberg IP Law, or Lieff Cabraser Heimann & Bernstein, LLP.

This information is not being sought for commercial purposes. If there are any fees for searching or copying these records, please inform me if the cost will exceed $5,000.

Nevada law requires that the custodian of such records respond to this request within five business days. N.R.S. § 239.0107(1). Records should be sent to me via electronic mail at pshaverdian@sidley.com or via regular mail at 350 South Grand Avenue, Los Angeles, CA 90071. If these requests are denied in whole or in part, please justify all denials by reference to specific exemptions under the law.

If you have any questions about these requests, please contact me by email. Thank you for your prompt attention to this matter.

Sincerely,

/s/ Phillip Shaverdian

# OFFICE OF THE ATTORNEY GENERAL
# PUBLIC RECORDS REQUEST FORM

***Please note: this form is intended to request records controlled by the Office of the Nevada Attorney General. Requests for records of other Nevada State agencies must be submitted directly to that State agency.***

| | |
|---|---|
| **Date of Request** | 10/03/2025 |
| **Requestor Contact Information** | |
| Name: | Joseph Ecker |
| Organization: | Steptoe LLP, on behalf of Louis Vuitton Malletier S.A.S. |
| Address: | [redacted] |
| City, State, Zip: | [redacted] |
| Phone: | [redacted] |
| E-mail: | [redacted] |

**Records Requested:**

Records held by the Office of the Nevada Attorney General: ☒ Yes ☐ No

Check one: ☐ Paper copies ☒ Electronic copies ☐ Certified copies ☒ Inspection (in person)

*Please be specific and include as much detail as possible regarding the records you are requesting.*

Steptoe LLP represents Louis Vuitton in a civil trademark counterfeiting lawsuit against Boulevard Mall: Louis Vuitton Malletier S.A.S v. Boulevard Ventures LLC, et al. No. 2:24-cv-02015-RFB-BNW (D. Nev.). We are seeking any evidence related to investigations of Boulevard Mall regarding the sale of counterfeit products from in or around 2022, including a November 1, 2022 raid at Boulevard Mall and subsequent prosecution of individuals associated with La Caballota/ La Farmacia, including Myra Lopez, and All Fish Wear, including Miguel Yuja. Specifically, we are seeking (1) copies of charging documents; (2) copies of any pictures or videos of the Market, Tenants, or goods that were ultimately surrendered to, or seized by, Nevada law enforcement for being counterfeit as part of your investigation; (3) access to, and the opportunity to inspect, any goods that were ultimately surrendered to, or seized by, Nevada law enforcement for being counterfeit as part of your investigation; and (4) copies of any chain of custody documents.

*To complete an estimate, the agency will need the following information:*

| | | | |
|---|---|---|---|
| ☐ I will pick up | ☐ Please FedEx<br>*Fed Ex billing number:* | ☐ Please send USPS | ☒ E-mail (if format allows)<br>[redacted] |

**Statement**

☒ I understand there is a charge for copies of public records. I understand I will receive a written estimate for production of the records indicated above if the estimated cost is expected to be over $25.00, which I will be required to pay in full prior to inspection or reproduction. Materials will be held for 30 days.

**Requester Signature** [redacted] _____ Signature

**Office Use Only**

| **Request status:** | | **Estimate:** | |
|---|---|---|---|
| Date | | | |
| _____ | Request received | Estimate: | $ _____ |
| _____ | Receipt acknowledgement issued | Date deposit received | _____ |
| _____ | Request filled | Actual (if different): | $ _____ |
| _____ | Estimated completion | Date final payment received | _____ |
| _____ | Estimate provided | Completed by | _____ |
| _____ | Request denied in whole | | |
| _____ | Other: | *Retain request form for 90 days following completing of request. RDA 2009047* | |

**Office of the Attorney General**
100 North Carson Street, Carson City, Nevada 89701 - Fax: 775-684-1108
1 State of Nevada Way, Suite 100, Las Vegas, Nevada 89119 - Fax: 702-486-3768
Attention: Public Records Coordinator

COOK & KELESIS
LTD
LAWYERS
[redacted]
Telephone: [redacted]
Facsimile:
E-mail: [redacted]

November 14, 2025

***VIA ELECTRONIC & U.S. MAIL TO:***
***agrecordsreq@ag.nv.gov***

Attorney General Aaron Ford
ATTN Public Records Coordinator
State of Nevada Way, Suite 100
Las Vegas, Nevada 89119

Dear Mr. Ford:

Under the Nevada Open Records Act § 239 et seq., I am requesting an opportunity to inspect or obtain copies of all public records as described below:

1. All communications and documents including electronic communications (text, Signal WhatsApp, Microsoft Teams, et al) exchanged between any US Attorney's office (any staff and/or any location) and any member of the Nevada Attorney General's staff from January 1, 2019 to the present;
2. Any log of phone calls or Microsoft Teams calls on personal or work devices between the US Attorney's Office and any member of the Nevada Attorney General's staff from January 1, 2019 to the present;
3. Any recorded meetings held on Microsoft Teams, Zoom, or other virtual meeting methods between the US Attorney's Office and any member of the Nevada Attorney General's staff from January 1, 2019 to the present;
4. All documents prepared, distributed, or shared between staff of the US Attorney's Office and any staff member of the Nevada Attorney General's office from January 1, 2019 to the present;
5. All documents and communications including electronic communications (text, Signal WhatsApp, Microsoft Teams, et al) discussing electors, presidential delegates, alternates, and/or concerning the 2020, 2022, or 2024 elections from January 1, 2019 to the present;
6. All non-privileged communications between or among the US Attorney and any federal staff to any other federal agency regarding or related to alternate electors, presidential electors, and/or the 2020, 2022, or 2024 elections from January 1, 2019 to the present;

The relevant time period for these requests is January 1, 2019 to present.

OFFICE OF THE ATTORNEY GENERAL
LAS VEGAS, NV
NOV 18 2025
ADMINISTRATION

If there are any fees for searching or copying these records, please inform me if the cost will exceed $100. However, I would also like to request a waiver of all fees because the disclosure of the requested information is in the public interest and will contribute significantly to the public's understanding of election integrity and processes for future elections. This information is not being sought for commercial purposes.

If production of the records I am requesting will take longer than 5 business days as specified in NRS 239.0107, please let me know when I will receive copies or the ability to inspect the requested records. But, as I'm sure you understand, time is of the essence with the fast-approaching election.

If you deny any or all of this request, please provide a log citing each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law. Additionally, please notify me if any of the requested material has been lost or destroyed.

Sincerely,
COOK & KELESIS, LTD.

[redacted]

GEORGE P. KELESIS, ESQ.

GPK/sdg

Wed Feb 4th, 2026 12:30 PM Eastern Time

# FAX

Blair [redacted]

**TO:**

Name: Attorney General

Fax Number: Multiple Recipients

# of Pages: 18
(including cover sheet)

**FROM:**

Name: Blair Reich

Fax Number: [redacted]

**Subject:** Records Request

**Message:**

Please find attached Open Records Request

RECEIVED
FEB 04 2026
ATTORNEY GENERAL
MAILROOM

Sent with HumbleFax.com

**Convoluted Federal Supremacy with Friends: Obligatory Public Records Request Letterhead**
*By: Dr. Blair Reich,* [redacted]

February 2, 2026

**Subject: Formal Public Records Request and Demand for Compliance - Phase II Escalation**

Notice to principal is notice to agent and notice to agent is notice to principal.

Dear State Agent,

This serves as official notice that you are a named respondent in my Updated & Expanded Public Records Request and Demand for Compliance: Phase II Escalation, pursuant to applicable federal (FOIA, 5 U.S.C. § 552) and state public records laws (e.g., Pennsylvania RTKL, 65 P.S. § 67.101 et seq., or your state equivalent). As a participant in the Title IV-D program—whether as a judge, commissioner (or equivalent executive/council member), DA, sheriff, DRS director/officer, clerk/prothonotary, accountant/manager overseeing Title IV-D funds in any way whatsoever, attorney general, auditor, compliance officer, inspector general, legal counsel, or other role—you are connected by constitution, code, contract, conspiracy, and crime, bound by oaths, bonds, and federal supremacy (U.S. Const. Art. VI; Cooperative Agreement §9) to fully respond. This demand is not limited to FOIA/RTK officers; all listed roles (judges, executives, enforcers, administrators) must act, regardless of department. Your participation is mandatory under these obligations; denials are unlawful and will be treated as obstruction, triggering personal and professional consequences including fines, disbarment, imprisonment, and civil/criminal liability under 18 U.S.C. § 1505 (obstruction), § 371 (conspiracy), and equivalent state laws.

Attached is the core demand section, including the necessarily thorough list of records requested. This record request is an excerpt from "Convoluted Federal Supremacy with Friends," an exposé detailing the systemic failures and criminal activities in the Title IV-D program. The full list of named government actors (~60 pages) is available in the Convoluted Federal Supremacy with Friends document. For the complete document, including the full preamble, standards, and consequences, visit blackcollarcartel.com. There, you will also find supporting works: "Convoluted Federal Supremacy" and the seminal "Black Collar Crime Spree," which detail the interstate cartel's operations involving child trafficking, property theft, income extortion, and laundering of Title IV-D funds—crimes you are aiding through non-compliance.

Under your oaths and duties (§3.9, §4.1, §4.3 of Cooperative Agreements; 45 C.F.R. § 302.10(a); equivalent provisions), you must immediately read this demand in full and disseminate it to all relevant personnel (supervisors, subordinates, counsel, IGs, auditors, judges, etc.). Each recipient must do the same, documenting via logs/affidavits. Provide proof in your response. To effectuate this via mass communication, forward with instructions for chain of command dissemination; non-compliance constitutes default.

**Failure to read, disseminate, or respond timely (acknowledgment by February 12, 2026; full response by February 26, 2026) constitutes default, estoppel (UCC § 1-308 or equivalent), and admission of complicity in treason (18 U.S.C. § 2381), conspiracy (§371), obstruction (§1505), RICO (§1964), RICO predicate acts (§1961 et seq.), and equivalent state laws, exposing you to personal liability, DOJ referrals, license revocation, and civil/criminal suits.** I intend to sue.

Comply with the mandatory and obligatory records request or face civil and criminal penalties jeopardizing your role, property, income, freedom, health, and security.

Sincerely,
Blair of Columbia with Contractual, Constitutional, and Divine Authority

# Updated & Expanded Public Records Request:

## Phase II Escalation Demand for Compliance

**To the Defaulting Federal Despots, State Bureaucrats, and Individual Enablers of This Treasonous Racket**—including all pilfering operatives at relevant federal, state, and local offices handling Title IV-D programs (e.g., HHS Secretary Robert F. Kennedy Jr., SSA Commissioner Frank J. Bisignano, their counsels/IGs; Pennsylvania DHS staff including Andrea Bankes; Lancaster DRS staff including Gary Kline at garykline@pacses.com, 150 N Queen Street, Lancaster, PA 17603; and equivalent directors, staff, and offices in all other states and counties):

This demand explicitly includes all judges, judicial conduct boards, disciplinary boards, and court administrators involved in Title IV-D or family law matters (including DVROs, PFAs, ROs, custody, support, and divorce). As part of judicial agencies under RTKL § 102 and § 304, you must disclose financial records (e.g., contracts, budgets, incentives under Cooperative Agreements §6, oaths/bonds tied to public funds) and administrative documents without exemption unless justified. Evasion violates your judicial oaths (28 U.S.C. § 1746; PA Const. Art. VI, § 3) and Code of Judicial Conduct Rule 2.15 (requiring response to misconduct allegations). Furthermore, by participating in Title IV-D cooperative agreements (which involve administrative and contractual duties, e.g., enforcement under §2.2(i) and funding under §5-6), judges operate in a quasi-administrative capacity, waiving absolute judicial immunity for such acts (per Forrester v. White, 484 U.S. 219 (1988), where immunity does not apply to administrative functions) and subjecting related records to full disclosure under RTKL as "financial records" tied to public contracts and federal funds. This includes any documents showing implementation (or failure) of federal supremacy in courtrooms, as these are administrative obligations under the agreements.

Your prior failures to comply with my December 24, 2025, FOIA/RTK demands—detailed in Phase I's "Convoluted Federal Supremacy" (pages 122-124)—are not oversights but deliberate obstructions, conspiring to shield the Black Collar Cartel engaged in illegal child trafficking, property theft, income extortion, and laundering of interstate Title IV-D funds. HHS under Robert F. Kennedy Jr. and SSA under Frank J. Bisignano stonewalled entirely, ignoring requests for State Plans, cooperative agreements, financials, contracts, oaths, and bonds—violating 5 U.S.C. § 552 (FOIA) and 45 C.F.R. § 5.1 et seq., exposing you to fines, penalties, and conspiracy charges under 18 U.S.C. § 371. PA DHS issued a partial, evasive "interim" extension via Andrea Bankes on January 5, 2026, lacking substantive documents, a Vaughn index (U.S. Dep't of State v. Ray, 502 U.S. 164 (1991)), and key items like State Plans and incentives—breaching 65 P.S. § 67.101 et seq. (RTKL). Of the 251 respondents, 249 failed utterly, refusing employment agreements, bonds, insurance, or third-party contracts tied to Title IV-D funds, amounting to dereliction under 18 U.S.C. § 4 (misprision) and acquiescence by silence under UCC § 1-308 (estoppel). Lancaster DRS ignored my October 21/November 1, 2025, demands for seized vs. distributed funds in PACSES 8730073 ($240K extorted from Blair J. Reich vs. disbursed to Alene Reich)—violating 5-day contractual mandates (§3.5 "Case Record Standards"), escalating to fraud (§3.3 remittance mismatches) and obstruction. Similar systemic failures are presumed across all states' Title IV-D operations.

This Phase II demand renews, expands, and escalates those requests as a standalone contractual obligation for full disclosure. It serves as notice to all prior, current, and new respondents (including witnesses and entities like state DHS directors across all 50 states). Federal entities (HHS/SSA) are bound by FOIA; Pennsylvania entities (PA DHS) by RTKL; other states by their respective public records laws (detailed below). Individuals are bound by oaths, bonds, and contractual duties (§3.9 in cooperative

agreements), with escalation to DOJ referrals and RICO suits (18 U.S.C. § 1964) for non-compliance. Your default will be construed as intentional aiding and abetting the cartel—conspiring in treason, trafficking, laundering, and fraud—triggering immediate admissions of guilt, fines, penalties, and personal liability.

Upon receipt of this demand, you are contractually and legally obligated under your oaths, bonds, and duties (§3.9, §4.1, §4.3 of Cooperative Agreements; 45 C.F.R. § 302.10(a); and equivalent federal, state, and local provisions) to immediately disseminate copies of this full document to all relevant personnel in your department, agency, or office, including but not limited to: supervisors, subordinates, legal counsel, inspectors general, compliance officers, auditors, and inter-agency liaisons. You must further instruct each recipient to similarly disseminate it within their respective chains of command and networks, creating a mandatory chain of disclosure. Upon receipt, federal (HHS/SSA), state (DHS/AGs), and local/county (DRS/courts) entities—including judges—must disseminate this full demand to all family court judges, hearing officers, and administrative staff handling Title IV-D cases. Each recipient must further disseminate to their subordinates and inter-agency contacts (e.g., judicial conduct boards), documenting via logs or affidavits. Provide these dissemination records in your response. Failure constitutes obstruction under 18 U.S.C. § 1505 and RTKL § 1304 (bad faith penalties up to $1,500/record), triggering mandamus actions to compel compliance. Failure to disseminate and document such actions (e.g., via emails, memos, or logs) constitutes non-compliance, triggering penalties under 18 U.S.C. § 371 (conspiracy), § 1505 (obstruction), and equivalent state laws, as well as estoppel under UCC § 1-308. This obligation applies equally to federal (e.g., HHS/SSA staff), state (e.g., DHS directors and AGs), and local/county (e.g., DRS staff, judges, commissioners) entities, ensuring comprehensive spread across all levels of the Title IV-D program.

## Biblical Preamble: Moral Imperative for Disclosure and Justice

In the name of the Lord Jesus Christ, who came to seek and save the lost (Luke 19:10), I address you serpents and scorpions under divine authority: "Behold, I give unto you power to tread on serpents and scorpions, and over all the power of the enemy: and nothing shall by any means hurt me" (Luke 10:19). You pervert justice like Pharaoh's taskmasters (Exodus 5:6-9), oppress the fatherless (Exodus 22:22-23), and pervert judgment (Deuteronomy 24:17). Proverbs 31:8-9 commands: "Open thy mouth for the dumb in the cause of all such as are appointed to destruction. Open thy mouth, judge righteously, and plead the cause of the poor and needy." Your silence mocks this, conspiring against the innocent (Psalm 82:3-4). Repent, disclose fully, or face divine wrath (Romans 6:23): "the wages of sin is death."

## Standards and Obligations You Are Bound to Follow

This demand relies on strong legal, contractual, and moral rules that everyone must follow. These rules are designed to make sure you provide full transparency and stop participating in ignoring higher federal laws, taking away people's rights in court, and wrongly seizing children, property, or money through the Title IV-D child support system.

- **Federal Constitution, Laws, Rules, Court Decisions, and Procedures**: The U.S. Constitution's Article VI (known as the Supremacy Clause) says federal laws are the highest in the land and

everyone must follow them. Amendment I protects your right to ask the government for help or fixes without being punished (as in the court case Hartman v. Moore, 547 U.S. 250 (2006)). Amendment XIV guarantees fair treatment and equal rights under the law (as explained in cases like Mathews v. Eldridge, 424 U.S. 319 (1976), which talks about balancing fairness in procedures, and Goldberg v. Kelly, 397 U.S. 254 (1970)). Key laws include 5 U.S.C. § 552 (FOIA, which gives the public absolute right to government records, per Dep't of Justice v. Tax Analysts, 492 U.S. 136 (1989)); 42 U.S.C. § 654(3) (making State Plans public); and 18 U.S.C. §§ 371 (conspiracy), 1505 (obstruction), 2382 (misprision, or hiding crimes). Rules like 45 C.F.R. § 302.10(a) require plans and agreements to be public. Court decisions include NLRB v. Robbins Tire & Rubber Co., 437 U.S. 214 (1978) (no hiding info without a good reason); EPA v. Mink, 410 U.S. 73 (1973) (release parts that can be shared); and U.S. Dep't of State v. Ray (separation of info). Court procedures: Fed. R. Civ. P. 26 (rules for discovering evidence); Hanna v. Plumer, 380 U.S. 460 (1965) (federal rules control).

- **State Constitutions, Laws, Rules, Court Decisions, and Procedures**: For Pennsylvania, the State Constitution's Article I, § 11 guarantees open courts and the right to seek justice; § 26 prevents discrimination. Laws like 65 P.S. § 67.101 et seq. (Right-to-Know Law, giving absolute access to records) and 23 Pa.C.S. § 4301 (making support info public). Rules such as 55 Pa. Code § 3140.21 (ensuring fair procedures). Court decisions: Curtis v. Kline, 542 Pa. 249 (1995) (equal protection under the law); Com. v. Bolden, 472 Pa. 602 (1977) (required actions). Court procedures: Pa.R.C.P. 1910.27 (discovery rules); Pa.R.C.P. 227.1 (seeking relief). For other states: Equivalent provisions under your state's constitution, public records law (listed below), and codes/regulations/case law for public access, due process, and child support.
- **Commercial Code (Business Rules)**: UCC § 1-308 (or 13 Pa.C.S.A. § 1308 or your state equivalent) (if you stay silent, it can mean you agree, creating a legal block); § 1-304 (or 13 Pa.C.S.A. § 1304 or your state equivalent) (must act in good faith); § 2-302 (or 13 Pa.C.S.A. § 2302 or your state equivalent) (unfair terms in contracts aren't allowed).
- **Contractual Requirements (Agreements You Signed)**: State Plans under 42 U.S.C. § 654 (must be public); Intergovernmental Agreements (§3.13 on cooperative deals); Cooperative Agreements (§9 on federal supremacy being top, §3.9 on bonds and oaths); Third-Party Contracts (§3.13 on legal services); Oaths (28 U.S.C. § 1746 and state versions, promises to follow the law).

# The Records Request: Clear and Contractually Obligated Demands

In support of my private investigation into this interstate racketeering enterprise abusing HHS/SSA funds via state DHS equivalents, provide immediately the following or best-fit equivalents, including all historical versions, amendments, drafts, redlines, unredacted copies, attachments, exhibits, appendices, referenced documents, metadata, audit trails, and any related records in any format (electronic, paper, audio, video, or otherwise). This exhaustive demand is grounded in your legal obligations under FOIA/RTKL equivalents, contractual disclosure mandates (§3.5, §3.6, §3.9, §5.1, §6.1, etc.), and public access rights to ensure accountability for systemic violations. All respondents must act in good faith to dismantle this racket—obstruction ties you to high crimes. To maximize scope and ensure fiduciary compliance while adhering to law and contract, this includes any and all documents you possess, control, or can access through affiliates, contractors, or archives, spanning from program inception to present, with no exemptions claimable without a detailed Vaughn index justifying each.

**General Guidance for All Questions:** Where a specific Pennsylvania law, code, regulation, canon, or rule is mentioned (e.g., 23 Pa.C.S., 55 Pa. Code, Pa. Const., Pa.R.C.P., PA Code of Judicial Conduct), if you are a respondent outside Pennsylvania, substitute and respond based on your state's equivalent provisions (e.g., your state's domestic relations code, due process regulations, constitution, court rules, or judicial conduct code). Failure to substitute and respond fully constitutes acknowledgment that no equivalent basis exists for non-compliance, and you must disclose accordingly.

1. Federal-State "State Plan" between HHS/SSA and your state's DHS (or equivalent) for Title IV-D, including all Phase I specifics such as: (i) the full text of the current State Plan; (ii) all amendments, renewals, and modifications; (iii) approval letters and correspondence from HHS/SSA; (iv) detailed budget projections and allocations; (v) incentive payment structures and formulas; (vi) compliance certification reports; (vii) audit findings and corrective actions; (viii) performance metrics and evaluations; (ix) related federal guidance documents; (x) historical versions from the past 20 years, along with any inter-state comparisons or federal oversight reports.
2. All similar State Plans for every other state, including all Phase I specifics such as: (i) the full text of each state's current State Plan; (ii) all amendments, renewals, and modifications; (iii) approval letters and correspondence from HHS/SSA; (iv) detailed budget projections and allocations; (v) incentive payment structures and formulas; (vi) compliance certification reports; (vii) audit findings and corrective actions; (viii) performance metrics and evaluations; (ix) related federal guidance documents; (x) historical versions from the past 20 years—primarily to federal HHS, but provide copies if held by your agency, along with any inter-state comparisons or federal oversight reports.
3. All Cooperative Agreements between your state's DHS and counties, including all Phase I specifics such as: (i) the full text of each agreement; (ii) all amendments, renewals, and modifications; (iii) approval letters and correspondence; (iv) detailed budget plans (§5.1); (v) incentive structures (§6.1); (vi) compliance reports; (vii) audit findings; (viii) performance evaluations; (ix) dispute resolution records; (x) subcontracts and MOUs, unredacted with attachments/exhibits (§5.1 budgets, §6.1 incentives), including all subcontracts, MOUs, addendums, financial projections, incentive payment calculations, and dispute resolution records.
4. All Cooperative Agreements between each state's DHS and counties, including all Phase I specifics such as: (i) the full text of each agreement; (ii) all amendments, renewals, and modifications; (iii) approval letters and correspondence; (iv) detailed budget plans (§5.1); (v) incentive structures (§6.1); (vi) compliance reports; (vii) audit findings; (viii) performance evaluations; (ix) dispute resolution records; (x) subcontracts and MOUs, including cross-state equivalents—primarily to federal HHS, but provide copies if held, with all funding allocation details, reimbursement claims, and penalty assessments.
5. All IGAs for child support/Title IV-D, including contracts with DAs, AGs, judges, sheriffs, clerks, conference officers, prothonotaries, private collection agencies, credit bureaus, and any other entities, with full disclosure of compensation structures, performance metrics, and conflict-of-interest declarations.
6. All 3rd Party/Private Contracts, including name, oath, bond, insurance, bank account, and contract for any entity/person handling Title IV-D funds (financial/legal advising), plus vendor selection processes, RFP documents, bid evaluations, and termination records.
7. For any person/office touching Title IV-D (judges, staff, contractors, etc.): Identity, addresses, role, job description, banking details (where funds are handled), bond, oath, salary, contract, organizational charts (including hierarchical structures, reporting lines, and inter-agency relationships), resumes, training certifications, disciplinary records, and performance evaluations.

8. List/copy of all my prior filings/notices (chronological), including internal notes, acknowledgments, processing logs, and any responses or denials not previously disclosed.
9. Disclosure of all communications about me (dates, copies/notes), including emails, memos, meetings minutes, phone logs, inter-agency correspondence, and any surveillance or monitoring records related to my case or inquiries.
10. (For Lancaster DRS (applicable to PA DHS) only) For Lancaster DRS (applicable to PA DHS): Total monies seized/garnished from Blair J. Reich (PACSES 8730073) vs. disbursed to Alene Reich—per §3.5/§3.6 records and 5-day mandate; all missing from October 21/November 1, 2025 (§3.3 remittance details, mismatches), plus full transaction ledgers, bank statements, and forensic accounting reports. For other states: Equivalent disclosures for any similar cases or systemic seized vs. disbursed data, including aggregate statistics on discrepancies over the past decade.
11. All financial records related to Title IV-D, including budgets, expenditures, revenue reports, incentive payments received/distributed, federal reimbursements, audits (internal/external), financial statements, grant applications, and any discrepancies or investigations into fund misuse.
12. All policies, procedures, manuals, training materials, guidelines, and directives governing Title IV-D operations, including enforcement protocols, due process checklists, rights notifications, appeal processes, and any updates or revisions over time.
13. All performance metrics, reports, evaluations, and data analytics for Title IV-D programs, including case closure rates, collection efficiencies, error rates, complaint logs, litigation outcomes, and demographic breakdowns of affected litigants.
14. All bonds, insurance policies, fidelity bonds, liability coverage, and indemnity agreements for any individual or entity involved in Title IV-D, including claims history, payout records, and underwriting documents.
15. All oaths of office, affirmations, ethical codes, conflict-of-interest forms, and certification documents for personnel handling Title IV-D matters, with verification of compliance and any violations noted.
16. All inter-agency communications, collaborative agreements, data-sharing protocols, and joint operation plans related to Title IV-D and broader family law enforcement (including DVROs, PFAs, ROs, custody, support, and divorce) across federal, state, and local levels, including privacy impact assessments and data security audits.
17. All complaints, investigations, lawsuits, settlements, and administrative actions related to Title IV-D and broader family law programs (including DVROs, PFAs, ROs, custody, support, and divorce), including whistleblower reports, Inspector General findings, and corrective action plans.
18. All legislative histories, lobbying records, policy advocacy materials, and stakeholder inputs influencing Title IV-D and broader family law implementation (including DVROs, PFAs, ROs, custody, support, and divorce), including communications with Congress, state legislatures, or advocacy groups.
19. All data retention policies, archival records, destruction logs, and backup systems for Title IV-D and broader family law documents (including DVROs, PFAs, ROs, custody, support, and divorce), ensuring no spoliation has occurred, with certifications of completeness.
20. Any other records, in any form, that touch upon, reference, or relate to Title IV-D and broader family law administration, funding, enforcement, or challenges thereto (including DVROs, PFAs, ROs, custody, support, and divorce), to the fullest extent permissible under applicable public records laws and contractual disclosure obligations.
21. Copies of every database report that has been produced or is required to be produced by contract from every County DRS section (or equivalent) in your state, including all reports on case volumes, collections, disbursements, incentives, compliance metrics, demographic data, and any other contractual reporting obligations, spanning the past 20 years.

22. Spot-check records for family law cases in March 2025: For each judge in your jurisdiction, provide the total number of cases handled by type (DVRO/PFA/RO, Custody, Support, Divorce), the full text of all orders issued in those cases, and a count of references to "Mathews Balancing Test" or "Mathews v. Eldridge" within those orders, including any related analyses, citations, or applications.
23. Any and all glossaries, definitions sections, manuals, or documents defining technical words and phrases used in Title IV-D or broader family law operations (including DVROs, PFAs, ROs, custody, support, and divorce), including both public-facing definitions and internal meanings or interpretations that must be substituted for casual usage, to reveal any discrepancies or specialized applications.
24. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that Federal Supremacy under U.S. Const. Art. VI does not apply to your Title IV-D or broader family law actions (including DVROs, PFAs, ROs, custody, support, and divorce proceedings), including any preemption analyses or legal opinions justifying state deviations. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that Federal Supremacy does not apply in these matters.
25. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that the right to care, custody, and control of children, as well as the right to acquire, possess, and protect property, are not fundamental liberties protected under the Constitution in Title IV-D or broader family law proceedings (including DVROs, PFAs, ROs, custody, support, and divorce), including any reclassifications or diminutions of these rights. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that these are not fundamental liberties.
26. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that when abridging fundamental rights and liberties, you are not bound to strict scrutiny review in Title IV-D or broader family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including alternative standards applied and rationales for lesser scrutiny. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that strict scrutiny is not required.
27. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that when operating under strict scrutiny, you are not bound to demonstrate compelling state interests in Title IV-D or broader family law proceedings (including DVROs, PFAs, ROs, custody, support, and divorce), including interest inventories and prioritization documents. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that compelling state interests are not required.
28. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that when operating under strict scrutiny, your goal of interstate fund reimbursement (constituting money laundering when achieved through illegal means) does not need to rise to the "of the highest order" standard in Title IV-D or broader family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including cost-benefit analyses and alternative funding mechanisms considered. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that such reimbursement goals meet the "of the highest order" standard.
29. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that litigants, witnesses, or requesters do not have

free speech rights (U.S. Const. Amend. I) or the right to grieve/petition for redress in Title IV-D or broader family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any restrictions or suppressions justified. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that these rights do not apply.

30. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that you can engage in overbroad actions or restrictions (federally restricted under strict scrutiny and due process standards) in Title IV-D or broader family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any analyses or justifications for broad-sweeping measures. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that overbroad actions are permissible.
31. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that you can intimidate or oppress litigants, witnesses, or requesters in Title IV-D or broader family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any protocols, training, or justifications for coercive tactics. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that intimidation or oppression is permissible.
32. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that you can use gaslighting, ad hominem attacks, or other tactics to chill free speech or suppress grievances in Title IV-D or broader family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any communication strategies or retaliation policies. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that such tactics are permissible.
33. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that you can misapply laws, rules, codes, or caselaw in Title IV-D or broader family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any justifications, training materials, or internal guidance on selective application or deviation. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that misapplication is permissible.
34. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations regarding RICO predicate acts (18 U.S.C. § 1961) and how any individual or entity (including law enforcement) would somehow be immune from liability for enforcing void orders in treasonous plots or conspiracies related to Title IV-D or broader family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any immunity analyses, legal opinions, or justifications for such actions. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for claiming or acting upon any immunity from RICO predicate acts in these contexts.
35. (For state AGs, state DHS heads, or DHS record request liaisons only) Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you (as state AGs, state DHS heads, or DHS record request liaisons) are operating under which lead you to believe that you have no obligation to prosecute or punish fiduciaries in the system—including custody conference officers, support enforcement/intake/conference officers, divorce masters, law enforcement, attorneys, judges, and state superior/supreme/appeal court judges or officials—for bad faith behavior or crimes such as treason, sedition, wire fraud, mail fraud, kidnapping, or other RICO predicate acts in Title IV-D or broader family law matters (including DVROs, PFAs, ROs,

custody, support, and divorce), including any defenses or justifications for non-action. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that you are not obligated to stop or punish such behavior and crimes.

36. (For state AGs, state DHS heads, or DHS record request liaisons only) Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you (as state AGs, state DHS heads, or DHS record request liaisons) are operating under which lead you to believe that you can allow crimes like treason, sedition, wire fraud, mail fraud, kidnapping, or other violations to go unstopped or unprosecuted in Title IV-D or broader family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any policies on prosecutorial discretion or non-enforcement related to family law fiduciaries. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that allowing such crimes is permissible.
37. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations clarifying under your applicable FOIA or public records laws (federal or state-specific) why you believe some or any part of this records request does not apply to you, including detailed exemptions claimed, Vaughn indices for each withholding, and legal bases for non-applicability. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that any part of this request does not apply, and all must be fully disclosed.
38. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations related to proactive disclosures of frequently requested records under FOIA (5 U.S.C. § 552(a)(2)(D)) or state equivalents, including lists of such records and reasons for not proactively releasing Title IV-D or family law-related materials. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for withholding frequently requested records from proactive disclosure.
39. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that you can stonewall requests, be derelict in duties, or fail to respond timely to public records demands or other obligations in Title IV-D or broader family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any policies on delays, non-responses, or extensions. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that stonewalling or dereliction is permissible.
40. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that Mathews Balancing Tests (Mathews v. Eldridge, 424 U.S. 319 (1976)) are not required when abridging fundamental rights and liberties in Title IV-D or broader family law proceedings (including DVROs, PFAs, ROs, custody, support, and divorce), including risk assessments or procedural justifications. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that Mathews Balancing Tests are not required in these matters.
41. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that litigants are not entitled to neutral arbitration, due notice, substantive and procedural due process, and equal protection in Title IV-D or broader family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any waivers, consent forms, or case law citations relied upon. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that litigants are not entitled to these protections.
42. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that the fit parent standard is a low bar and

requires substantial and prolonged failure to provide for the safety and well-being of a child or deliberately putting them in clear and present danger in Title IV-D or broader family law contexts (including DVROs, PFAs, ROs, custody, support, and divorce), including evidentiary thresholds and application guidelines. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon a diminished fit parent standard.

43. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that you can generate or tolerate state-created dangers (prohibited under DeShaney v. Winnebago County, 489 U.S. 189 (1989) and related caselaw) in Title IV-D or broader family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any risk assessments or policies allowing such dangers. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that generating state-created dangers is permissible.
44. (For state supreme courts, judicial conduct boards, or disciplinary boards only) Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you (as state supreme courts, judicial conduct boards, or disciplinary boards) are operating under which lead you to believe that you can ignore federal supremacy under U.S. Const. Art. VI in your supervisory role over family law cases or enable lawbreaking by lower courts or officials in Title IV-D or broader family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any analyses justifying limited review or non-intervention. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that ignoring federal supremacy or enabling lawbreaking is permissible in your supervisory capacity.
45. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations related to your agency's FOIA/public records request handling processes, including denial rates, appeal statistics, average response times, fee waiver decisions, and any internal audits or reviews of compliance with disclosure laws over the past 10 years. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for non-transparent or non-compliant handling of requests.
46. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that federal regulations governing Title IV-D programs (e.g., 45 C.F.R. §§ 302-308) do not preempt or override conflicting state practices in family law proceedings (including DVROs, PFAs, ROs, custody, support, and divorce), including any regulatory impact analyses or compliance checklists. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that federal regulations do not apply or can be ignored.
47. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that federal rules of evidence or procedure (e.g., Fed. R. Evid. 401-403 on relevance and prejudice) do not bind hybrid federal-state proceedings under Title IV-D or broader family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any procedural harmonization memos or deviations justified. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that federal evidentiary or procedural rules do not apply.
48. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that indicate that upon hearing about these matters you're not required to do an internal investigation regarding the extent that the crimes alleged are impacting your organization, with a complete audit and suspension of all interstate Title IV-D funding until resolved, in Title IV-D or broader family law matters (including DVROs, PFAs, ROs, custody, support, and divorce). If no such

documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that such an investigation, audit, and suspension are not required.

49. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that your state's constitution (e.g., for Pennsylvania, Pa. Const. Art. I, §§ 1, 11, 26 on inherent rights, open courts, and no discrimination, or your state equivalent) does not protect litigants' rights to due process, equal protection, or redress in Title IV-D or broader family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any interpretations diminishing these state constitutional protections. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that state constitutional protections do not apply.
50. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that you are not bound by the statutory language in your state's domestic relations code sections (e.g., for Pennsylvania, 23 Pa.C.S. §§ 4301 et seq., or your state equivalent), nor by resulting domestic relations regulations, in Title IV-D or broader family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any justifications for circumvention or misapplication. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that you are not bound by these statutes and regulations.
51. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that you are not bound by case law pertaining to your state's domestic relations code sections and regulations in Title IV-D or broader family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any analyses dismissing or reinterpreting relevant precedents. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that you are not bound by this case law.
52. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that indicate that federal, state, and local court rules do not apply to you in Title IV-D or broader family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any justifications or exemptions claimed. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that court rules do not apply.
53. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that local rules of court (e.g., county-specific family court rules or administrative orders) can override federal or state mandates in Title IV-D or broader family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any preemption analyses or justifications for local deviations. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that local rules supersede higher authority.
54. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that commercial codes (e.g., UCC §§ 1-308 on acquiescence by silence/estoppel (or 13 Pa.C.S.A. § 1308 or your state equivalent), 1-304 on good faith (or 13 Pa.C.S.A. § 1304 or your state equivalent), 2-302 on unconscionable terms (or 13 Pa.C.S.A. § 2302 or your state equivalent)) do not apply to Title IV-D contracts, cooperative agreements, or third-party arrangements in family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any exemptions or alternative commercial standards applied. If no such documents exist or are provided, this constitutes your acknowledgment that

there is no lawful basis for holding or acting upon the view that commercial codes do not govern these arrangements.

55. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that contractual obligations under Title IV-D agreements (e.g., §3.9 on bonds/oaths, §5.1 on budgets, §6.1 on incentives) can be ignored or modified without mutual consent or due process in family law proceedings (including DVROs, PFAs, ROs, custody, support, and divorce), including any amendment processes or waiver justifications. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that these contractual obligations are not binding.
56. Any and all documents regarding communications or actions taken to disseminate this request, including who you contacted to ensure it was spread across relevant entities. If no such documents exist or are provided, this constitutes your acknowledgment that no dissemination efforts were made, exposing you to further liability for obstruction.
57. Any and all documents regarding communications for help putting the answer together, including details of whoever was put in charge of this request and any form of communication they required for help to complete it and the source, time, document, recording, or notes regarding help received, by whom, and in what form. This should be a log with every interaction. If no such documents exist or are provided, this constitutes your acknowledgment that no assistance efforts were made, exposing you to further liability for obstruction.
58. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that the Affirmation of Federal Supremacy in Section 9 of the Cooperative Agreement does not require full compliance with all federal Title IV-D requirements, including due process under Mathews v. Eldridge and strict scrutiny for abridging fundamental rights in family law proceedings (including DVROs, PFAs, ROs, custody, support, and divorce). If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that federal supremacy can be ignored or partially applied.
59. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that federal regulations (45 C.F.R. §§ 302-308) do not require the provision of all enumerated Title IV-D services (e.g., location, paternity establishment, support order establishment, enforcement, medical support) in full compliance with due process and equal protection standards in Title IV-D or broader family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any waivers or deviations justified. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that these services can be provided without full constitutional protections.
60. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that federal case law (e.g., Troxel v. Granville, 530 U.S. 57 (2000) on parental rights; Santosky v. Kramer, 455 U.S. 745 (1982) on clear and convincing evidence for terminating parental rights) does not apply to Title IV-D proceedings or allows for lesser standards in family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any reclassifications of rights. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that federal precedents can be disregarded.
61. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that federal court rules (e.g., Fed. R. Civ. P. 26 on discovery) do not govern discovery or evidence in hybrid federal-state Title IV-D proceedings, including any local overrides justified. If no such documents exist or are provided, this constitutes

your acknowledgment that there is no lawful basis for holding or acting upon the view that federal rules are inapplicable.

62. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that state plans under 42 U.S.C. § 654 do not require full adherence to federal supremacy, due process via Mathews Balancing Tests, strict scrutiny for fundamental rights, or the fit parent standard in Title IV-D or broader family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any state plan provisions allowing deviations. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that state plans supersede or modify federal requirements.
63. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that state codes (e.g., 23 Pa.C.S. §§ 4301 et seq. on child support or your state equivalent) permit non-compliance with federal Title IV-D obligations, such as providing all required services without abridging constitutional rights in family law proceedings (including DVROs, PFAs, ROs, custody, support, and divorce), including any selective applications. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that state codes override federal mandates.
64. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that state regulations (e.g., 55 Pa. Code § 3140.21 on due process or your state equivalent) do not mandate Mathews tests, neutral arbitration, or strict scrutiny when impacting fundamental liberties in Title IV-D or family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any exemptions. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that state regulations allow lesser protections.
65. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that state case law (e.g., Curtis v. Kline on equal protection or your state equivalent) permits deviations from federal due process or equal protection in Title IV-D proceedings, including any reinterpretations in family law contexts (including DVROs, PFAs, ROs, custody, support, and divorce). If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that state precedents conflict with federal law.
66. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that state or local court rules (e.g., Pa.R.C.P. 1910.27 on discovery or your state equivalent) can be applied without ensuring federal supremacy, Mathews compliance, or strict scrutiny in Title IV-D matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any local rule justifications. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that court rules supersede federal obligations.
67. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that Cooperative Agreements (e.g., Section 3.9 on bonds/oaths, Section 5.1 on budgets) do not require suspension of payments for noncompliance under Section 8.5, or allow incentive payments to reward violations of federal supremacy in family law proceedings (including DVROs, PFAs, ROs, custody, support, and divorce), including any performance metric analyses. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that contractual terms permit noncompliance.
68. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that incentive schemes under Section 6 are lawful

even if they incentivize non-compliance with federal due process, strict scrutiny, or fit parent standards by rewarding higher collections without constitutional safeguards in Title IV-D or family law matters (including DVROs, PFAs, ROs, custody, support, and divorce), including any cost-benefit justifications. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that incentives can promote unlawful actions.

69. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that audits under Section 8.1 and corrective action plans under Section 8.4 are not mandatory, or can be ignored without triggering suspension of payments or penalties in cases of noncompliance with federal Title IV-D requirements (including DVROs, PFAs, ROs, custody, support, and divorce), including any discretion policies. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that audits and CAPs are optional.
70. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that suspension of payments under Section 8.5 for noncompliance (e.g., below 80% performance standards) does not apply when violations involve abridging fundamental rights without strict scrutiny or Mathews tests in family law proceedings (including DVROs, PFAs, ROs, custody, support, and divorce), including any exception rationales. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that suspensions can be avoided for constitutional violations.
71. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that administrative duties under Section 3 (e.g., remittance, safeguarding information, record standards, bonding) can be performed without ensuring full due process and equal protection in Title IV-D cases, including any operational guidelines allowing shortcuts. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that these duties override constitutional rights.
72. Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that UCC provisions (e.g., § 1-304 on good faith (or 13 Pa.C.S.A. § 1304 or your state equivalent)) do not apply to Title IV-D cooperative agreements or allow bad faith in incentive distributions or audit enforcements, including any commercial exemptions. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for holding or acting upon the view that commercial good faith is not required.
73. Any and all documents, logs, emails, or affidavits proving dissemination of this demand to all judges and judicial staff in your jurisdiction, including timestamps, recipients, and confirmations of receipt. If none exist, this acknowledges failure to disseminate, violating RTKL § 902 (response duties) and exposing you to penalties.
74. (For judges or judicial agencies only) Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you (as judges or judicial agencies) are operating under which lead you to believe RTKL § 304 (requiring disclosure of financial records) or Pa.R.J.A. 509 (access to judicial financial records or your state equivalent) does not apply to Title IV-D-related documents (e.g., cooperative agreements, incentives, oaths/bonds). If none exist, this acknowledges no basis for exemption and requires full disclosure.
75. (For judges or judicial agencies only) Any and all documents showing why you believe judicial independence (Cooperative Agreement §1.2) allows evasion of RTKL requests for administrative/financial records in Title IV-D matters, including any analyses or court orders. If none exist, this acknowledges that independence does not bar compliance.

76. (For judges or judicial agencies only) Any and all records of judicial training, ethics opinions, or conduct board rulings on judges' duties to respond to public records requests under RTKL (or your state equivalent), including violations of Code of Judicial Conduct Rule 2.5 (competence/diligence, or your state equivalent) for non-response. If none exist, this acknowledges no training excuses evasion.
77. (For judges or judicial agencies only) Any and all documents, contracts, laws, regulations, opinions, memos, or interpretations that you are operating under which lead you to believe that judges, by entering into or administering Title IV-D cooperative agreements (e.g., as fiduciaries enforcing support orders under §2.2), do not waive judicial immunity for administrative acts (per Forrester v. White, 484 U.S. 219 (1988) and Pulliam v. Allen, 466 U.S. 522 (1984)), including any analyses on loss of absolute immunity in contractual/federal-funding contexts. If no such documents exist or are provided, this constitutes your acknowledgment that there is no lawful basis for claiming immunity in these administrative roles, requiring full accountability.
78. (For judges or judicial agencies only) Any and all documents, including spot-checks of judicial orders from the past 5 years, showing implementation of federal supremacy (U.S. Const. Art. VI) in Title IV-D/family law cases (e.g., citations to Mathews v. Eldridge for due process, strict scrutiny for parental rights under Troxel v. Granville, or preemption of state rules conflicting with 45 C.F.R. §§ 302-308). Provide counts of orders referencing these, full texts of 10 sample orders per judge, and any internal guidelines for applying federal law in courtrooms. If none exist, this acknowledges failure to implement federal supremacy, violating Cooperative Agreement §9 and judicial oaths.
79. (For judges or judicial agencies only) Any and all documents, complaints, investigations, or disciplinary records related to judges' failure to apply federal supremacy in Title IV-D proceedings, including referrals to Judicial Conduct Board (or your state equivalent) or Supreme Court for ethics violations (PA Code of Judicial Conduct Rule 2.2 on impartiality/law compliance, or your state equivalent). If none exist, this acknowledges no accountability mechanisms, exposing systemic non-compliance.
80. (For judges or judicial agencies only) Any and all affidavits or personal certifications from each judge handling Title IV-D cases, under penalty of perjury, affirming their courtroom application of federal supremacy (e.g., requiring Mathews tests before abridging rights), or explaining deviations. If none are provided, this constitutes admission of non-compliance, triggering mandamus (42 Pa.C.S. § 8301 or your state equivalent) to compel judicial adherence.
81. **For Court Clerks and Filing Protocols**: Any and all documents, including but not limited to policies, manuals, internal memos, training materials, emails, directives, or legal opinions, that authorize, permit, or provide guidance for court clerks or staff to deviate from standard protocols in the handling of filings, such as intentionally delaying processing, rejecting submissions without standard justification, or introducing errors into records, from January 1, 2006, to the present. In the event the agency defaults on this request by failing to provide responsive documents or a complete response, it shall be construed as an admission that no such authorizations exist and that any such deviations are unauthorized and improper.
82. **For Accountants in the Title IV-D System**: Any and all documents, including but not limited to accounting guidelines, audit procedures, compliance manuals, internal reports, correspondence, or legal interpretations, that allow or instruct accountants or financial personnel within the Title IV-D child support enforcement system to continue operations without corrective action after identifying material defects, discrepancies, or irregularities in processes, accounting records, actual figures versus reported data, or other indicators of systemic issues, from January 1, 2006, to the present. In the event the agency defaults on this request by failing to provide responsive documents or a complete response, it shall be construed as an admission that no such

allowances exist and that continuing operations amid known defects is unauthorized and improper.

83. **For Contract Operators in the System**: Any and all documents, including but not limited to contracts, amendments, addendums, waivers, subcontracts, legal opinions, or exemption clauses, that specifically exempt or relieve operators, vendors, or contractors within the system (such as those involved in Title IV-D administration) from fulfilling duties, obligations, or performance standards outlined in their contracts, from January 1, 2006, to the present. In the event the agency defaults on this request by failing to provide responsive documents or a complete response, it shall be construed as an admission that no such exemptions exist and that any failure to fulfill contractual duties is unauthorized and improper.

## Consequences of Failure

No fees for public documents. Obstruction/default will be deemed intentional aiding and abetting the cartel—conspiracy under 18 U.S.C. § 371, treason under §2381, misprision under §2382—implicating you in trafficking, laundering, and fraud. This triggers admissions of guilt, fines, penalties, personal liability, DOJ referrals, RICO actions, and escalation to higher authorities/courts. Silence constitutes default and estoppel. Non-response by judges triggers immediate appeals to OOR (RTKL § 1101), mandamus petitions to compel disclosure (42 Pa.C.S. § 8301), and complaints to the Judicial Conduct Board for violating Code Rule 2.15 (failure to address misconduct). This includes personal liability under 42 U.S.C. § 1983 for due process violations.

To the legal professionals among you—counsels, inspectors general, attorneys, and judges—you know better than nearly everyone else the extent of lawbreaking here and what you're facilitating willingly or through dereliction of duty. You have a fiduciary and ethical duty to stop it rather than effectuate it; your oaths demand nothing less. If you choose to default on this demand and continue shielding the cartel, be assured: we will pursue you relentlessly in every conceivable way. You will be named as respondents in civil and criminal actions exposing this massive crime spree. We will demand your arrests, prosecutions, and disbarments through citizen-led grand juries, federal investigations, and public accountability campaigns. Your careers, reputations, and freedoms hang in the balance—comply fully, or face the unyielding consequences of your betrayal of justice.

## Timelines and Format

You have 20 days for full response (10 for acknowledgment; 5 for local items). Withholdings require Vaughn index (Ray). Electronic format preferred (email/thumb drive), with searchable PDFs and native files. If no records, state in writing under penalty of perjury (28 U.S.C. § 1746; judges via judicial oath). Judges must personally certify or delegate to their Open Records Officer, with copies to judicial conduct boards.

**The public records laws for each state are as follows:**

**Alabama**'s is the Alabama Public Records Law under Al. Code §§ 36-12-40; 36-12-41.
**Alaska**'s is the Alaska Public Records Act under A.S. §§ 40.25.110 to 40.25.125; 40.25.151.
**Arizona**'s is the Arizona Public Records Law under A.R.S. §§ 39–121.01 to 39–121.03.
**Arkansas**'s is the AK Freedom of Information Act under Ark. Code Ann. §§ 25-19-101 to 25-19-111.

**California**'s is the California Public Records Act under Gov't Code §§ 7920.000 to 7931.000.
**Colorado**'s is the Colorado Open Records Act under C.R.S. §§ 24-72-200.1 to 24-72-205.5.
**Connecticut**'s is the Connecticut Freedom of Information Act under Connecticut General Statutes Chapter 14 §§ 1–200 to 1-242.
**Delaware**'s is the Delaware Freedom of Information Act under Tit. 29, §§ 10001 to 10007; 10112.
**District of Columbia**'s is the Freedom of Information Act under DC Official Code §§ 2–531 to 2-540.
**Florida**'s is the Florida Sunshine Law under Fla. Stat. §§ 119.01 to 119.19.
**Georgia**'s is the Georgia Open Records Act under O.C.G.A. §§ 50-18-70 to 50-18-103.
**Hawaii**'s is the Uniform Information Practices Act (Modified) under Haw. Rev. Stat. §§ 92F-1 to 92F-43.
**Idaho**'s is the Idaho Public Records Act under Idaho Code §§ 74–101 to 74-126.
**Illinois**'s is the Illinois Freedom of Information Act under ILCS 5 §§ 140/1 to 140/11.6.
**Indiana**'s is the Access to Public Records Act under IN Code §§ 5-14-3-1 to 5-14-3-10.
**Iowa**'s is the Iowa Open Records Law under Iowa Code §§ 22.1 to 22.16.
**Kansas**'s is the Kansas Open Records Act under KSA §§ 45–215 to 45-524.
**Kentucky**'s is the KY Open Records Act under Kentucky Revised Statute Chapter §§ 61.870 to 61.884.
**Louisiana**'s is the Louisiana Public Records Law under La.R.S. §§ 44:31 to 44:41.
**Maine**'s is the Maine Freedom of Access Act under Tit. 1, §§ 400 to 434.
**Maryland**'s is the Maryland Public Information Act under Gen. Provis. §§ 4–101 to 4-601.
**Massachusetts**'s is the Massachusetts Public Records Law under Mass. Gen. Laws ch. 66, §§ 1 to 21.
**Michigan**'s is the Freedom of Information Act under Mich. Comp. Laws Ann. §§ 15.231 to 15.246.
**Minnesota**'s is the Data Practices Act under Minn. Statutes §§ 13.01 to 13.99 Ch. 13 Appendix.
**Mississippi**'s is the Mississippi Public Records Act under Miss. Code Ann. §§ 25-61-1 to 25-61-19.
**Missouri**'s is the Missouri Public Records Act under Mo. Code §§ 109.180; 610.010 to 610.225.
**Montana**'s is the Montana Public Records Act under Montana Code §§ 2-6-101 to 2-6-1020.
**Nebraska**'s is the Nebraska Public Records Law under Nebraska Statutes §§ 84–712 to 84-712.09.
**Nevada**'s is the Nevada Open Records Act under N.R.S. §§ 239.010-239.340.
**New Hampshire**'s is the Right to Know Law under R.S.A. Ch. 91-A:1 to 91-A:10.
**New Jersey**'s is the New Jersey Open Public Records Act under N.J.S.A. §§ 47:1A-1 to 47:1A-13.
**New Mexico**'s is the Inspection of Public Records Act under NMSA §§ 14-2-1 to 14-2-12.
**New York**'s is the New York Freedom of Information Law under Pub. Off. §§ 84 to 90.
**North Carolina**'s is the North Carolina Public Records Law under NCGS Chapter 132–1 to 132-11.
**North Dakota**'s is the Open Records Statute under NDCC §§ 44-04-18 to 44-04-32.
**Ohio**'s is the Ohio Open Records Law under Ohio Rev. Code §§ 149.43 to 149.45; 2743.75.
**Oklahoma**'s is the Oklahoma Open Records Act under Title 51 Oklahoma Statutes §§ 24A.1 to 24A.32.
**Oregon**'s is the Oregon Public Records Law under O.R.S. §§ 192.311 to 192.513.
**Pennsylvania**'s is the Right-to-Know Law under 65 Pennsylvania Statute §§ 67.101 to 67.1310.
**Rhode Island**'s is the Rhode Island Access to Public Records Act under P.L. §§ 38-2-1 to 38-2-16.
**South Carolina**'s is the SC Freedom of Information Act under S.C. Code Ann. §§ 30-4-10 to 30-4-165.
**South Dakota**'s is the South Dakota Sunshine Law under SDCL Chapter 1-27-1 to 1-27-48.
**Tennessee**'s is the Tennessee Open Records Act under Tenn. Code Ann. §§ 10-7-503 to 10-7-508.
**Texas**'s is the Texas Public Information Act under Gov't §§ 552.001 to 552.376.
**Utah**'s is the Gov Records Access and Management Act under Utah Code Title 63G-2-101 to 63G-2-804.
**Vermont**'s is the Vermont Open Records Law under Vermont Statute Tit. 1, §§ 315 to 320.
**Virginia**'s is the Virginia Freedom of Information Act under Code of Virginia §§ 2.2-3700 to 2.2-3715.
**Washington**'s is the Washington Public Records Act under RCW §§ 42.56.001 to 42.56.904.
**West Virginia**'s is the WV Freedom of Information Act under W.Va. Code §§ 29B-1-1 to 29B-1-7.
**Wisconsin**'s is the Wisconsin Open Records Law under Wisconsin Statute §§ 19.21 to 19.39.
**Wyoming**'s is the Wyoming Sunshine Law under Wyo. Stat. §§ 16-4-201 to 16-4-205.

# Fax Cover Page

| | |
|---|---|
| Recipient: | +1 (702) 486-3768<br>NEVADA ATTORNEY GENERAL PIO |
| Date Sent: | 07/16/2026 |
| Number of Pages: | 11 (including cover page) |
| Sender: | John - |
| Reply-to Email: | |
| Reply-to Phone: | +1 [redacted] |
| Reply-to Fax: | |
| Subject: | NRS 239 PUBLIC RECORDS REQUEST |

Message:

Sent with Mobile Fax

# OFFICE OF THE ATTORNEY GENERAL
# PUBLIC RECORDS REQUEST FORM

*Please note: this form is intended to request records controlled by the Office of the Nevada Attorney General. Requests for records of other Nevada State agencies must be submitted directly to that State agency.*

| **Date of Request** | |
|---|---|
| **Requestor Contact Information** | |
| Name: | John Quintero |
| Organization: | CITIZENS FOR PARTICIPATORY JUSTICE |
| Address: | [redacted] |
| City, State, Zip: | |
| Phone: | |
| E-mail: | |

**Records Requested:**

Records held by the Office of the Nevada Attorney General: ☒ Yes ☐ No

Check one: ☒ Paper copies ☒ Electronic copies ☐ Certified copies ☐ Inspection (in person)

*Please be specific and include as much detail as possible regarding the records you are requesting.*

SEE ATTACHMENT "A" 9 PAGES

*To complete an estimate, the agency will need the following information:*

| ☐ I will pick up | ☐ Please FedEx<br>*Fed Ex billing number:* | ☐ Please send USPS | ☒ E-mail (if format allows) |
|---|---|---|---|

**Statement**

☒ I understand there is a charge for copies of public records. I understand I will receive a written estimate for production of the records indicated above if the estimated cost is expected to be over $25.00, which I will be required to pay in full prior to inspection or reproduction. Materials will be held for 30 days.

**Requester Signature** _____ [redacted] _____

**Office Use Only**

| **Request status:** | | **Estimate:** | |
|---|---|---|---|
| Date | | | |
| _____ | Request received | Estimate: | $ _____ |
| _____ | Receipt acknowledgement issued | Date deposit received | _____ |
| _____ | Request filled | Actual (if different): | $ _____ |
| _____ | Estimated completion | Date final payment received | _____ |
| _____ | Estimate provided | Completed by | _____ |
| _____ | Request denied in whole | | |
| _____ | Other: | *Retain request form for 90 days following completing of request. RDA 2009047* | |

**Office of the Attorney General**
100 North Carson Street, Carson City, Nevada 89701 - Fax: 775-684-1108
1 State of Nevada Way, Suite 100, Las Vegas, Nevada 89119 - Fax: 702-486-3768
Attention: Public Records Coordinator

# ATTACHMENT A

## DESCRIPTION OF RECORDS REQUESTED

**Requester:** John Randall Quintero
**Organization:** Citizens for Participatory Justice
**Date:** July 16 2026

**Subject: Attorney General Cost Allocation Plan and Legal Services Provided to the Nevada Department of Corrections**

Pursuant to the Nevada Public Records Act, NRS Chapter 239, I request electronic copies of the public records described below that are maintained, possessed or controlled by the Office of the Nevada Attorney General.

**Time period**

This request covers the period **July 1, 2015, through the date the Office conducts its search**, unless a particular item expressly states otherwise.

**Purpose and scope**

The purpose of this request is to determine:

1. How the Office calculates the portion of the Attorney General Cost Allocation Plan attributable to the Nevada Department of Corrections;
2. What amounts have been assessed, transferred, drawn, billed, paid or received for legal services provided to NDOC;
3. Whether civil litigation services, including motion practice, discovery, trial preparation, trials and appeals, are included in AGCAP or are separately billed;
4. What additional litigation expenses are charged directly to NDOC; and
5. The overall public cost of representing NDOC in civil actions filed by incarcerated or formerly incarcerated persons.

This request seeks fiscal, accounting and administrative records. It does not seek confidential legal advice, litigation strategy, attorney-client communications or substantive attorney work product.

**I. AGCAP plans, calculations and methodology**

Please produce:

1. Every Attorney General Cost Allocation Plan, allocation schedule, supporting spreadsheet and calculation applicable to NDOC for the requested period.
2. Every policy, manual, memorandum, instruction, accounting procedure or written explanation describing:

   a. How the AGCAP cost pool is established;
   b. Which Attorney General expenditures are included or excluded;
   c. How attorney and legal-support hours are recorded;
   d. How NDOC's percentage or share is calculated;
   e. How the allocation is distributed among NDOC budget accounts and funding sources; and
   f. How adjustments or reconciliations are made between estimated, budgeted and actual hours.
3. Records showing, for each fiscal year or biennium:

   a. The total recoverable AGCAP cost pool;
   b. The total attorney hours used in the statewide calculation;
   c. The total hours attributed to NDOC;
   d. NDOC's percentage share of the total hours or costs;
   e. The resulting amount allocated to NDOC; and
   f. Any effective hourly rate, blended rate or equivalent rate used or calculated in preparing the allocation.
4. All records showing adjustments, true-ups, credits, carry-forwards or reconciliations based upon differences between:

   a. Hours originally estimated or budgeted for NDOC; and
   b. Hours actually spent providing services to NDOC.
5. Any federal submission, approval, review, audit or correspondence concerning the treatment of NDOC within AGCAP, to the extent maintained by the Attorney General's Office.

**II. Actual assessments, transfers and receipts**

Please produce records showing every amount assessed, drawn, transferred, billed, paid, reimbursed or otherwise received from NDOC for Attorney General services during the requested period, including:

1. AGCAP assessments and receipts recorded in **Category 89**, under **General Ledger 7391**, or under any predecessor or

successor category or object code.

2. Notices, schedules, invoices, assessment statements or other records informing NDOC of the amount it was required to budget or pay.
3. Interagency transfer records, journal vouchers, payment vouchers, draw records, fiscal reports and accounting entries showing, to the extent maintained:
   a. Transaction date;
   b. Amount;
   c. Fiscal year;
   d. NDOC paying budget account;
   e. Attorney General receiving budget account;
   f. Category and general-ledger or object code;
   g. Funding source;
   h. Document, voucher or transaction number; and
   i. Transaction description.
4. Records of any reversal, correction, refund, credit or adjustment involving an NDOC payment or AGCAP assessment.
5. Existing annual or biennial reports summarizing the total amount received from NDOC by the Attorney General's Office.

**III. Attorney and legal-support time attributed to NDOC**

Please produce existing reports, summaries, spreadsheets or database exports showing attorney and legal-support time attributed to NDOC during each fiscal year.

To the extent that the information is maintained by category, please include hours attributed to:

1. Prisoner civil-rights litigation,
2. Medical and dental-care litigation;
3. Americans with Disabilities Act or Rehabilitation Act litigation;
4. Employment litigation;
5. Motion and dispositive-motion practice;
6. Discovery and depositions;
7. Settlement conferences and mediation;
8. Trial preparation and trial;
9. Post-trial motions;
10. Appeals;

11. Administrative proceedings;
12. Advice concerning administrative regulations, medical directives, policies or operating procedures;
13. Contract review;
14. Investigative services; and
15. Other legal services.

Aggregate fiscal information is sufficient. Narrative descriptions revealing privileged legal advice or litigation strategy may be redacted while producing the date, hours, broad service category, matter identifier and other nonprivileged fiscal information.

Please also produce records showing:

1. The number and classification of attorneys, investigators, paralegals and legal-support personnel whose costs were assigned or attributed to NDOC; and
2. The division, unit or section responsible for those services, including the **Bureau of Litigation, Public Safety Division**, where applicable.

**IV. Litigation included in or excluded from AGCAP**

Please produce every policy, accounting instruction, memorandum or other record explaining:

1. Whether attorney time spent representing NDOC in civil litigation is included in AGCAP;
2. Whether AGCAP includes time spent on:
   a. Reviewing complaints;
   b. Preparing answers;
   c. Motions to dismiss;
   d. Summary-judgment motions;
   e. Discovery;
   f. Depositions;
   g. Settlement proceedings;
   h. Trial preparation;
   i. Jury or bench trials;
   j. Post-trial proceedings; and
   k. Appeals;
3. Which litigation services or expenses are excluded from AGCAP and billed or charged separately; and
4. Which office, agency, budget account or fund is responsible for separately billed litigation expenses.

**V. Direct and case-specific litigation expenses**

Please produce records controlled by the Attorney General's Office showing amounts charged to, paid by or reimbursed by NDOC outside the ordinary AGCAP assessment for:

1. Expert witnesses and consultants;
2. Depositions and deposition transcripts;
3. Court reporters and transcripts;
4. Medical or other records;
5. Investigators;
6. Process servers;
7. Attorney, witness or staff travel;
8. Outside counsel;
9. Electronic discovery or litigation-support services;
10. Trial exhibits and demonstrative evidence;
11. Filing fees and court costs;
12. Witness fees;
13. Copying and document-production expenses; and
14. Any other directly billed litigation expense.

Please include records coded under General Ledger codes **7080 through 7086**, or any predecessor or successor code used for legal or court expenses, and records under any code used for expert-witness or litigation-support expenses.

For each transaction, please provide, to the extent maintained:

- Date;
- Amount;
- Vendor or payee;
- Case or matter number;
- General-ledger or object code;
- NDOC budget account;
- Attorney General budget account;
- Funding source; and
- Voucher or transaction number.

**VI. Existing prisoner-litigation reports and matter lists**

Please produce any existing matter list, report, spreadsheet or database export identifying civil actions handled by the Attorney General's Office on behalf of NDOC during the requested

period that were filed by incarcerated or formerly incarcerated persons.

To the extent maintained, please include:

1. Case name;
2. Court case number;
3. Attorney General matter number;
4. General subject category;
5. Date opened and closed;
6. Disposition;
7. Fiscal year;
8. Total attorney or legal-support hours;
9. Direct litigation expenses; and
10. Whether the legal work was included in AGCAP or directly billed.

I am not requesting copies of the pleadings or complete litigation files through this paragraph.

**Specifically identified case**

Please produce existing fiscal, accounting and timekeeping records concerning the representation of NDOC defendants in:

**Nicolai Mork v. Perry Russell, et al., United States District Court for the District of Nevada, Case No. 3:21-cv-00077.**

For that action, please produce existing records showing:

1. Total attorney and legal-support hours by fiscal year;
2. Whether those hours were included in AGCAP or separately billed;
3. Aggregate hours attributed to discovery, motion practice, trial preparation, trial, post-trial proceedings and appeal, if maintained by such categories;
4. Expert-witness, deposition, transcript, travel, investigation and trial expenses;
5. Payments or reimbursements received from NDOC;
6. The budget accounts and accounting codes used; and
7. Any record identifying which state account or fund was responsible for paying the judgment, litigation expenses or related costs.

Narrative attorney time descriptions may be redacted where legally necessary, but I request the reasonably segregable fiscal information, including dates, hours, amounts, matter identifiers

and general accounting categories.

**VII. Agreements and administrative arrangements**

Please produce:

1. Any memorandum of understanding, interagency agreement, service agreement or similar record between the Attorney General's Office and NDOC concerning legal representation, cost allocation, litigation expenses or reimbursement;
2. Any agreement describing services supplied by the Public Safety Division to NDOC;
3. Records identifying the Attorney General budget account into which NDOC payments are deposited; and
4. Records identifying the NDOC budget accounts from which the Attorney General's Office draws or receives payments.

**VIII. Accounting definitions and record structure**

Please produce:

1. The chart-of-accounts provisions, code definitions, data dictionaries and written instructions used by the Attorney General's Office for AGCAP and NDOC legal expenses;
2. Definitions for all categories, general-ledger codes, object codes, revenue codes and transaction types appearing in responsive records; and
3. Applicable records-retention schedules for AGCAP, attorney timekeeping, interagency transfers, direct billings and litigation-expense records.

## Form of production

I request electronic production by email or electronic transfer.

Please provide:

- Spreadsheets and database records in their native Excel or CSV format where reasonably available;
- Documents in searchable PDF format;
- Electronic records with existing column headings, field definitions and formulas preserved; and
- Records on a rolling basis as they become available rather than withholding all production until the entire request has been completed.

Where a requested calculation or total is not maintained as an

existing record. I am not asking the Office to create a new analysis. Please instead produce the existing reports, spreadsheets, exports or underlying fiscal records from which the requested information may be determined.

## Redactions and withheld records

This request does not seek privileged communications or substantive litigation strategy.

If the Office determines that any responsive record contains confidential information, please:

1. Produce all reasonably segregable nonconfidential portions;
2. Redact only the information made confidential by law;
3. Identify the general nature of the information withheld;
4. Cite the specific statute or other legal authority supporting each withholding or redaction; and
5. State whether the record is withheld in whole or produced with redactions.

The presence of attorney-client communications or work product within a record should not prevent disclosure of segregable fiscal information such as dates, hours, amounts, account codes, transaction numbers, budget accounts or aggregate expenditures.

## Custody of records

If the Attorney General's Office does not have legal custody or control of a requested record, please identify the name and address of the governmental entity believed to possess it, if known, as contemplated by NRS 239.0107.

## Fees

Please provide records electronically to minimize reproduction expense.

I request that no charge exceeding **$25** be incurred without first providing a written, itemized estimate and obtaining my authorization. If fees may be reduced or waived because the records concern governmental expenditures and matters of substantial public interest, I request such reduction or waiver.

## Prioritization

If the Office determines that the request must be processed in stages, please produce the records in this order:

1. AGCAP plans, allocation schedules and methodology;

2. Annual NDOC attorney-hour totals and allocation calculations;
3. Records of assessments, transfers, draws and receipts;
4. Policies distinguishing AGCAP from directly billed litigation;
5. Direct litigation expenses;
6. Prisoner-litigation matter reports; and
7. Records concerning *Mork v. Russell*.

Please respond within the period prescribed by NRS 239.0107. If the records cannot be produced within that period, please provide the required written response identifying the earliest date and time when the records are reasonably expected to be available.

Respectfully submitted,

**John Randall Quintero**

Signature: [redacted]

Date: 07/16/2026

Email: [redacted]

Telephone: [redacted]

Address: [redacted]

NRS 239.0107 requires the governmental entity to act on a written or oral request by the end of the fifth business day by producing the record, identifying another custodian, giving an availability date, or denying the request with the applicable legal authority.