

IN THE SUPREME COURT OF THE STATE OF NEVADA

---

DR. SHERA D. BRADLEY,

Petitioner,

vs.

THE EIGHTH JUDICIAL DISTRICT  
COURT OF THE STATE OF NEVADA, IN  
AND FOR THE COUNTY OF CLARK,  
AND THE HONORABLE DOUGLAS W.  
HERNDON, DISTRICT JUDGE

Respondents,

and

DONTAE HUDSON, AN INDIVIDUAL;  
AND THE STATE OF NEVADA, BY AND  
THROUGH STEVEN B. WOLFSON, IN HIS  
OFFICAL CAPACITY AS DISTRICT  
ATTORNEY FOR THE COUNTY OF  
CLARK,

Real Parties in Interest.

Electronically Filed  
Jul 01 2016 10:13 a.m.  
Tracie K. Lindeman  
Clerk of Supreme Court

CASE NO: 70522

**STATE'S APPENDIX**

KATHLEEN BLISS, ESQ.

Nevada Bar #007606

JASON HICKS, ESQ.

Nevada Bar #013149

Kathleen Bliss Law PLLC

400 S. 4<sup>th</sup> Street, Suite 500

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(702) 793-4202

Counsel for Petitioner

KAREN A. CONNOLLY, ESQ.

Nevada Bar #4240

6600W. Charleston Blvd., Suite 124

Las Vegas, Nevada 89146

(702) 678-6700

Counsel for Real Party in Interest

STEVEN B. WOLFSON

Clark County District Attorney

Nevada Bar #001565

Regional Justice Center

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Post Office Box 552212

Las Vegas, Nevada 89155-2212

(702) 671-2500

State of Nevada

ADAM PAUL LAXALT

Nevada Attorney General

Nevada Bar # 012426

100 North Carson Street

Carson City, Nevada 89701-4717

(775) 684-1265

Counsel for Real Party in Interest

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## **CERTIFICATE OF SERVICE**

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on July 1, 2016. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

ADAM PAUL LAXALT  
Nevada Attorney General

KATHLEEN BLISS, ESQ.  
Counsel for Petitioner

KAREN A. CONNOLLY, ESQ.  
Counsel for Real Party in Interest

OFELIA L. MONJE  
Deputy District Attorney

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage pre-paid, addressed to:

JUDGE DOUGLAS W. HERNDON  
Eighth Judicial District Court, Dept. III  
Regional Justice Center, 16<sup>th</sup> Floor  
200 Lewis Avenue  
Las Vegas, Nevada 89101

BY /s/ j. garcia  
Employee, District Attorney's Office

1 **INFM**  
2 STEVEN B. WOLFSON  
3 Clark County District Attorney  
4 Nevada Bar #001565  
5 SAMUEL S. MARTINEZ  
6 Chief Deputy District Attorney  
7 Nevada Bar #10539  
8 200 Lewis Avenue  
9 Las Vegas, Nevada 89155-2212  
10 (702) 671-2500  
11 Attorney for Plaintiff

**FILED IN OPEN COURT**  
STEVEN D. GRIERSON  
CLERK OF THE COURT

JUN 16 2015

BY,   
ROSHONDA MAYFIELD, DEPUTY

DISTRICT COURT  
CLARK COUNTY, NEVADA

7 I.A. 6/16/15  
8 10:00 AM  
9 K. CONNOLLY

9 THE STATE OF NEVADA,  
10 Plaintiff,

CASE NO: C-15-307301-1

11 -vs-

DEPT NO: III

12 DONTAE HUDSON,  
13 #2778981

14 Defendant.

INFORMATION

15 STATE OF NEVADA }  
16 COUNTY OF CLARK } ss.

17 STEVEN B. WOLFSON, District Attorney within and for the County of Clark, State  
18 of Nevada, in the name and by the authority of the State of Nevada, informs the Court:

19 That DONTAE HUDSON, the Defendant(s) above named, having committed the  
20 crimes of **FIRST DEGREE KIDNAPPING (Category A Felony - NRS 200.310, 200.320 -**  
21 **NOC 50053); SEX TRAFFICKING OF A CHILD UNDER 16 YEARS OF AGE**  
22 **(Category A Felony - NRS 201.300.2a1 - NOC 58003); CHILD ABUSE, NEGLECT, OR**  
23 **ENDANGERMENT (Category B Felony - NRS 200.508(1) - NOC 55226) and LIVING**  
24 **FROM THE EARNINGS OF A PROSTITUTE (Category D Felony - NRS 201.320 -**  
25 **NOC 51006),** on or between February 1, 2015 and February 13, 2015, within the County of  
26 Clark, State of Nevada, contrary to the form, force and effect of statutes in such cases made  
27 and provided, and against the peace and dignity of the State of Nevada,

28 ///

1 COUNT 1 - FIRST DEGREE KIDNAPPING

2 did wilfully, unlawfully, and feloniously, lead, take, entice, carry away or kidnap J.A.,  
3 a minor, with the intent to keep, imprison, or confine said J.A., from her parents, guardians, or  
4 other person or persons having lawful custody of J.A., or with the intent to hold J.A. to  
5 unlawful service, or to perpetrate upon the person of J.A. any unlawful act, to-wit: prostitution.

6 COUNT 2 - SEX TRAFFICKING OF A CHILD UNDER 16 YEARS OF AGE

7 did wilfully, unlawfully, and feloniously induce, cause, and/or recruit, J.A., a child  
8 under sixteen years of age, to engage in prostitution.

9 COUNT 3 - CHILD ABUSE, NEGLECT, OR ENDANGERMENT

10 did wilfully, unlawfully, and feloniously cause a child under the age of 18 years, to-  
11 wit: J.A., being approximately 15 year(s) of age, to suffer unjustifiable physical pain or mental  
12 suffering as a result of abuse or neglect, to wit: sexual exploitation, and/or cause J.A. to be  
13 placed in a situation where she might have suffered unjustifiable physical pain or mental  
14 suffering as a result of abuse or neglect, to wit: sexual exploitation, by forcing and/or allowing  
15 and/or encouraging the said J.A. to be a prostitute.

16 COUNT 4 - LIVING FROM THE EARNINGS OF A PROSTITUTE

17 did then and there wilfully, unlawfully, feloniously, and knowingly accept, receive,  
18 levy, or appropriate money, without consideration, from J.A., the proceeds of prostitution  
19 activity.

20 STEVEN B. WOLFSON  
21 Clark County District Attorney  
22 Nevada Bar #001565

23 BY

24 SAMUEL S. MARTINEZ  
25 Chief Deputy District Attorney  
26 Nevada Bar #10539

27 ///

28 ///

///

Names of witnesses known to the District Attorney's Office at the time of filing this  
Information are as follows:

NAME

ADDRESS

ADMUNDSON, MARK

HPD #1250

A. J.

C/O METRO VICE

CRUZ, MICHAEL

LVMPD #4840

CUSTODIAN OF RECORDS

CCDC

CUSTODIAN OF RECORDS

LVMPD COMMUNICATIONS

CUSTODIAN OF RECORDS

LVMPD RECORDS

GATUS, JUSTINE

LVMPD #9868

HARDSON, ANDRAIL

C/O METRO VICE

HARDSON, KEN

C/O METRO VICE

LEUNG, RICHARD

LVMPD #8556

RUANO, M

Cash America-Super Pawn

VAN CLEEF, WILLIAM

LVMPD #7093

DA#15F05296X/jm/SVU  
LVMPD EV#1502130159  
(TK11)

  
CLERK OF THE COURT

NWEW  
STEVEN B. WOLFSON  
Clark County District Attorney  
Nevada Bar #001565  
SAMUEL S. MARTINEZ  
Chief Deputy District Attorney  
Nevada Bar #10671  
200 Lewis Avenue  
Las Vegas, Nevada 89155-2212  
(702) 671-2500  
Attorney for Plaintiff

DISTRICT COURT  
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

DONTAE HUDSON,  
#2778981

Defendant.

CASE NO: C307301

DEPT NO: III

NOTICE OF WITNESSES AND/OR EXPERT WITNESSES  
[NRS 174.234]

TO: DONTAE HUDSON, Defendant; and

TO: KAREN CONNOLLY, ESQ., Counsel of Record;

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the STATE OF  
NEVADA intends to call the following witnesses and/or expert witnesses in its case in chief:

A. J.; C/O METRO VICE

AMUNDSON, MARK; HPD #1250

COR; NV DMV

COR; T-MOBILE

CRUZ, MICHAEL; LVMPD #4840

GATUS, JUSTINE; LVMPD #9868

HARDSON, ANDRIL; C/O METRO VICE

HARDSON, KEN; C/O METRO VICE

1 HOIER, DON; Will testify as an expert in the area of pimp and prostitution subculture,  
2 including cultural norms and the nature of the subculture, dynamics of pimp-prostitute  
3 relations, terminology and language, and known behaviors from the pimp and prostitution  
4 subculture.

5 LEUNG, RICHARD; LVMPD #8556

6 RUANO, M; 3270 S Valley View Blvd LVN 89102

7 VAN CLEEF, WILLIAM; LVMPD #7093

8 WEIGARTNER, PETER; 3270 S Valley View Blvd LVN 89102

9 These witnesses are in addition to those witnesses endorsed on the Information or  
10 Indictment and any other witness for which a separate Notice of Witnesses and/or Expert  
11 Witnesses has been filed.

12 The substance of each expert witness' testimony and copy of all reports made by or at  
13 the direction of the expert witness has been provided in discovery.

14 A copy of each expert witness' curriculum vitae, if available, is attached hereto.

16 STEVEN B. WOLFSON  
17 Clark County District Attorney  
18 Nevada Bar #001565

19 BY /s/ SAMUEL S. MARTINEZ  
20 SAMUEL S. MARTINEZ  
21 Chief Deputy District Attorney  
Nevada Bar #10671

22 CERTIFICATE OF FACSIMILE TRANSMISSION

23 I hereby certify that service of Notice of Witnesses and/or Expert Witnesses, was  
24 made this 24th day of June, 2015, by facsimile transmission to:

25 KAREN CONNOLLY, ESQ.  
26 FAX #678-6767

27 BY /s/ J. MOTL  
28 Secretary for the District Attorney's Office



# **CURRICULUM VITAE**

***Sergeant Donald M. Hoier***  
***Las Vegas Metropolitan Police Department***  
***Vice Section, Vice/Narcotics Bureau***  
***Office: 702-828-3455***

## **LAW ENFORCEMENT EXPERIENCE**

06/2012 – 01/2013	Vice Crimes Investigator Supervisor (Innocence Lost Task Force)
01/2010 – 04/2010	Vice Crimes Investigator Supervisor (Innocence Lost Task Force)
09/2009 – Present	Vice Crimes Investigator Supervisor (Trick Roll Investigative Cases Team)
09/2009 – Present	Vice Crimes Investigator Supervisor (Pandering Investigation Team)
05/2001 – 09/2009	Vice Crimes Investigator Supervisor (Enforcement)
02/1999 – 05/2001	Northwest Area Command, Swing Patrol Field Training Sergeant
02/1998 – 02/1999	Northwest Area Command, Graveyard Patrol (Supervisor)
02/28/1998	Promoted to Police Sergeant
07/1996 – 02/1998	Northeast Area Command, Swing Patrol Field Training Officer
01/1996 – 07/1996	Northwest Area Command, Swing Patrol Field Training Officer
10/1993 – 01/1996	Northwest Area Command, Graveyard Patrol (Officer)
07/1992 – 10/1993	Airport Section, Patrol (Officer)
03/03/1992	Date of Hire

## **SPECIAL TRAINING**

<u>TITLE</u>	<u>DATES</u>	<u>HOURS</u>
Interview & Interrogation	06/30/1995	12
Informant Management	05/12/1998	4
Search Warrant Preparation/Execution	05/12/1998 - 05/13/1998	14
Search Warrant Certification (Tactical)	04/13/2004	9

Contemporary Police Leadership	03/23/2006	10
Seizures & Forfeitures	11/15/2006	8
Human Trafficking	02/01/2007	8
Management Development	06/03/2008	40

## **SEMINARS/CONFERENCES**

<u>TITLE</u>	<u>DATES</u>	<u>HOURS</u>
Western States Vice Investigators Conference (Denver, Colorado)	08/27/2001 – 08/31/2001	45
Western States Vice Investigators Conference (Las Vegas, Nevada)	08/29/2005 – 09/02/2005	45
Protecting Victims of Child Prostitution (NCMEC)	02/04/2007 – 02/08/2007	45
Narcotics, Vice & Street Crimes Supervisor Training Seminar	04/14/2008 – 04/18/2008	36
Advanced Vice Investigations Seminar	03/04/2009 - 03/07/2009	40
2012 Innocence Lost Coordinators Conference	07/23/2012 – 07/25/2012	24
Nevada AG's Sex Trafficking Summit	01/09/2013	6

## **TEACHING EXPERIENCE**

### **Las Vegas Municipal Court Alternative Sentencing Division:**

<i>"First Offender Prostitution Program (John School)"</i>	2009 - Present
<i>"Female Prostitution Diversion Program (Jane School)"</i>	2009 - Present

### **Las Vegas Metropolitan Police Department:**

<i>"Vice Laws"</i>	2006 - Present
<i>"Patrol Response to Vice-Related Incidents"</i>	2006 - Present
<i>"The Game – The Pimp/Prostitute Subculture"</i>	2006 - Present

### **LVMPD Citizen's Police Academy:**

<i>"Policing Sex"</i>	2010 – Present
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<b>Clark County District Attorney's Office:</b>	
<i>"The Game – The Pimp/Prostitute Subculture"</i>	12/17/2009
<i>"Vice Section Policy and Investigative Strategies"</i>	12/17/2009
<b>Las Vegas Security Chiefs' Association:</b>	
<i>"Nightclubs, Ultra Lounges, &amp; European Pools"</i>	09/29/2009
<i>"The Game – The Pimp/Prostitute Subculture"</i>	01/07/2010
<i>"Vice-Related Theft: A Security Professional's Guide"</i>	02/16/2010
<b>City Center Hotel Group:</b>	
<i>"Nightclubs, Ultra Lounges, &amp; European Pools"</i>	12/07/2009
<b>Planet Hollywood:</b>	
<i>"Nightclubs, Ultra Lounges, &amp; European Pools"</i>	12/09/2009
<b>Smoking Hot Aces:</b>	
<i>"Nightclubs, Ultra Lounges, &amp; European Pools"</i>	12/17/2009
<b>Hard Rock Hotel:</b>	
<i>"Nightclubs, Ultra Lounges, &amp; European Pools"</i>	12/17/2009
<i>"Nightclubs, Ultra Lounges, &amp; European Pools"</i>	05/16/2012
<b>Cosmopolitan Hotel:</b>	
<i>"Nightclubs, Ultra Lounges, &amp; European Pools"</i>	02/03/2011
<i>"Vice-Related Theft: A Security Professional's Guide"</i>	02/03/2011
<i>"The Game – The Pimp/Prostitute Subculture"</i>	09/21/2011
<b>Enforcement EXPO Conference:</b>	
<i>"Overcoming Challenges with Reluctant Victims of Prostitution"</i>	08/31/2011
<b>Clark County School District Police:</b>	
<i>"The Game – The Pimp/Prostitute Subculture"</i>	08/26/2011
<i>"The Game – The Pimp/Prostitute Subculture"</i>	10/27/2011
<b>Nevada Board of Massage Therapists:</b>	
<i>"The Game – The Pimp/Prostitute Subculture"</i>	09/23/2011
<b>IRS – CI Gaming Symposium:</b>	
<i>"The Game – The Pimp/Prostitute Subculture"</i>	08/25/2011
<b>Boulder Highway Corridor Security Association:</b>	
<i>"The Game – The Pimp/Prostitute Subculture"</i>	09/15/2011
<b>Innocence Lost National Initiative Strategy and Case Coordination Conference:</b>	
<i>"Challenges In Prosecuting Juvenile Sex Trafficking Cases"</i>	07/25/2012

## **SPECIAL PROJECTS**

Served as a member of the Nevada Attorney General's Sex Trafficking Legislation Workgroup which was responsible for crafting AB67. AB67 establishes the crime of sex trafficking of children and adults, makes victims eligible for state assistance, and allows them to sue their traffickers. (2012-Present)

Testified, as an expert in the pimp/prostitute subculture, to a Joint Meeting of the Assembly Committee on Judiciary and Senate Committee on Judiciary of the Nevada State Legislature in support of AB67. (02/20/2013)

Testified, as an expert in the pimp/prostitute subculture, to a meeting of the Assembly Committee on Judiciary of the Nevada State Legislature in support of AB113, AB146 and AB152 (02/27/2013)

## **TASK FORCE MEMBERSHIP**

Southern Nevada Human Trafficking Task Force (SNHTTF) 09/2009 – Present

Innocence Lost Task Force (ILTF) 09/2009 – Present

## **TECHNICAL ADVISOR**

Provided review, input and commentary regarding the, "*Sex Industry and Sex Workers*" chapter of *The Social Health of Nevada* report, prior to it being forwarded to the desk of Governor Guinn. The report was a collaborative effort of the University of Nevada faculty, Clark County professionals, and State of Nevada officials. Its purpose was to identify leading social indicators which would allow elected officials to better prioritize and budget in areas such as health and human services, education and the environment.

Provided technical assistance and on-camera interviews regarding the pimp/prostitute subculture and prostitution in Las Vegas, Nevada for Part III of the Oxygen Network's *Who Cares About Girls Documentary Series* entitled, "*Sex Workers or Victims?*" This story aired March 30, 2008 on the Oxygen Network.

Provided technical assistance to Writers/Producers David Weddle and Bradley Thompson, of the CBS Television Series, *CSI: Crime Scene Investigation* regarding the pimp/prostitute subculture and prostitution in Las Vegas, Nevada for the Season 10 episode, entitled "*The Lost Girl.*" This episode aired 11/12/2009.

## **DOCUMENTARIES/LITERATURE VIEWED**

"Pimpology: *The 48 Laws of the Game*"

"Prostitution and Trafficking In Nevada: *Making the Connection*"

"Pimps Up, Ho's Down"

"American Pimp"

Pimpin' Ken Ivy

Melissa Farley

Brent Owens

The Hughes Brothers

## **SUMMARY**

Sergeant Donald Hoier has been a police officer with the Las Vegas Metropolitan Police Department for twenty (21) years. The first nine (9) years of his career were spent in the Patrol Division, where he served as a first responder. During this time period, he served for two (2) years as a Field Training Officer - responsible for mentoring, training and evaluating newly graduated Police Officers; became a Nevada POST certified Defensive Tactics Instructor; and served for a year as a Field Training Sergeant – responsible for supervising, mentoring, training and evaluating a squad of Field Training Officers and their newly graduated trainees. He was promoted to his current rank on February 28, 1998.

Sergeant Hoier transferred to the Vice Section, Vice/Narcotics Bureau in 2001. His vice experience and training spans nearly twelve (12) years, and includes operations in the areas of enforcement, investigations and intelligence gathering involving pimps, prostitutes, their clientele, and others in the illegal adult entertainment/sex industry. Sergeant Hoier currently supervises the Pandering Investigations Team (PIT), which is responsible for identifying, targeting and apprehending individuals involved in pandering-related crimes and the Trick Roll Investigative Cases Team (TRIC), which is responsible for investigating vice-related theft. He has been involved in hundreds of pandering investigations, involving both juvenile and adult victims of prostitution, and has conducted thousands of hours of interviews with pimps, prostitutes and their clientele. Sergeant Hoier continues to expand his knowledge of the pimp/prostitute subculture, vice-related issues, and the adult entertainment/sex industry through independent study, to include: the reading of books, specialized publications and research papers; viewing related documentaries; internet research; and by attending related seminars and conferences. This has given him a unique insight to and understanding of the pimp/prostitute subculture and sex industry, to include its language, customs, rules, regulations, networks, operational strategies, methods of recruitment and discipline.

While assigned to the Vice Section, Sergeant Hoier has, and continues to, develop and provide vice-related training to law enforcement and security professionals throughout Clark County, Nevada. He assisted in the development of, and currently instructs, the pimp/prostitute subculture portions of the First Offender Prostitution Program and Female Prostitution Diversion Program offered by the Las Vegas Municipal Court Alternative Sentencing Division. In 2005, Dr. Dimitri Shalin, Director of the UNLV Center for Democratic Culture, contacted the Las Vegas Metropolitan Police Department seeking input to and review of the "*Sex Industry and Sex Workers*" chapter of *The Social Health of Nevada Report*, prior to it being forwarded on to Governor Guinn. Sergeant Hoier was selected to represent the Las Vegas Metropolitan Police Department in this endeavor.

Sergeant Hoier has testified multiple times in the 8<sup>th</sup> Judicial District Court, Clark County Justice Court, and Las Vegas Municipal Court trials regarding vice-related cases, including pandering-related crimes.

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Felony/Gross Misdemeanor**

**COURT MINUTES**

**June 02, 2016**

C-15-307301-1      State of Nevada  
vs  
Dontae Hudson

**June 02, 2016      9:00 AM      All Pending Motions**

**HEARD BY:** Herndon, Douglas W.      **COURTROOM:** RJC Courtroom 16C

**COURT CLERK:** Deborah Miller

**RECORDER:** Sara Richardson

**PARTIES**      Sam Martinez, Deputy District Attorney, present on behalf of the State.

**PRESENT:**      Defendant Hudson present, in custody, represented by Karen Connolly, Esq.

**JOURNAL ENTRIES**

Also present: Kathleen Bliss, Esq. Attorney for Shera Bradley, PH.D.

MOVANT/REAL PARTY IN INTEREST DR SHERA D. BRADLEY. PH.D'S MOTION TO VACATE AMENDED ORDER REQUIRING DISCLOSURE OF CONFIDENTIAL TREATMENT RECORDS TO COURT AND TO FURTHER SEAL ALL PLEADINGS RELATED TO CHILD VICTIM...DEFENDANT'S MOTION TO COMPEL AND FOR SHERA BRADLEY TO BE HELD IN CONTEMPT.

Arguments by Ms. Bliss, noting NRS 49.209 and NRS 49.211. Ms. Connolly argued issue has already been ruled on by the Court. Further, Ms. Connolly argued information should be reviewed and turned over if exculpatory. Further arguments by counsel. Court stated FINDINGS and ORDERED, Defendant's Motion to Compel and for Shera Bradley to be Held in Contempt, GRANTED IN PART, Records to be submitted for in-camera review. Ms. Bliss requested order be stayed for fourteen days to determine if a writ will be filed. Based on trial date, COURT FURTHER ORDERED, order to compel STANDS for seven days. Ms. Connolly advised she will be out of the country, however, Mr. Bond will appear on her behalf. COURT ORDERED, matter CONTINUED; Status Check SET.

PRINT DATE: 06/08/2016

Page 1 of 2

Minutes Date: June 02, 2016

1 SA 000011

As to Movant/ Real Party in Interest Dr. Shera D. Bradley, PH.D's Motion to Vacate Amended Order Requiring Disclosure of Confidential Treatment Records to Court and to Further Seal All Pleadings Related to Child Victim, COURT ORDERED, motion DENIED.

NIC (COC-NDC)

6/09/16 9:00 AM STATUS CHECK: FILING OF WRIT.....MOTION TO COMPEL