

FILED

MAR 31 2017

1 Bryan Ferguson # 96803
2 HDSP / P.O. BOX 650
3 INDIAN SPRINGS, NV 89070
4 Appellant in Proper Person

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY [Signature]
DEPUTY CLERK

5
6 IN THE SUPREME COURT OF THE STATE OF NEVADA

7 BRYAN MICHAEL FERGASON

Supreme Court No. 72640

8 Appellant,

Dist Ct. Case No. A537416

9 vs.

10 LAS VEGAS METROPOLITAN POLICE DEPT,

Motion to Waive Filing Fees, Cost

11 Respondent.

Bond and Other Relief

12 Comes Now, Appellant Bryan Ferguson (Ferguson), in Proper Person
13 and Requests this Honorable Court waive any filing fees, cost bond,
14 as well as consider the additional relief set forth below.

15 This motion is based upon the cited to applicable sections of the
16 NRS, NRAP and decisional case law interpreting same, as well as the
17 attached Memorandum of Points and Authorities, and the various
18 filings in the District Court referred to below.

19 Respectfully submitted this 27 day of March, 2017.

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21 Bryan Ferguson # 96803

22 Appellant in Proper Person

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24 Memorandum of Points and Authorities

25 I. Introduction

26 Appellant Ferguson, an inmate at HDSP, has been litigating the
27 issue of funds by LUMPP for almost a decade. The matter was
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RECEIVED
MAR 30 2017
ELIZABETH A. BROWN
CLERK OF SUPREME COURT
DEPUTY CLERK

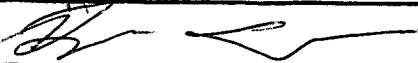
1 Ferguson's financial circumstances have not materially changed (or
2 changed at all) such that his IPP status in this matter (DC or
3 NSC level) should not be denied and his request for waiver granted.
4 Ferguson has submitted a request for a financial certificate, but
5 it takes the NASC 15-45 days to process. He will submit the
6 certificate in support of this motion when received.

7 Finally, this appeal has merit and involves a significant issue
8 of public policy as to the seizure of assets. Counsel is therefore
9 requested, as the issues are as complex and difficult as they
10 were on the 1st appeal, and the integrity of this Court's published
11 opinion is at stake since the Respondents, their counsel, and
12 the district court took unfair advantage of Ferguson and
13 granted Summary Judgment without an evidentiary hearing,
14 allowing discovery, or hearing the matter on the merits, and
15 ignored the law of the case, and also the law of Nevada on
16 forfeiture. Counsel will be needed to adequately prepare, present
17 and litigate these issues in front of this Honorable Court.

18
19 Respectfully submitted this 27 day of March 2017

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22 Bryan Ferguson # 96403

23 Appellant in Pro Per

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25 A copy of this Motion was sent to counsel for LVMPD on this
26 27 day of March 2017 postage prepaid and mailed from HOSP.

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28 Bryan Ferguson # 96403
Appellant in Pro Per

Offender Information

Offender Number 0096803 Institution: HDSP Living Unit: B
 Offender Name: FERGUSON, BRYAN M Housing Facility: U7 Cell: 9
 Account Status: Open Bed: B

Primary Trust Transactions

Date	Transaction Type	Payer / Paid To	Reference Number	Deposit# / Check#	Amount	Balance	Loc Code
02/01/2017						\$779.00	
02/03/2017 05:11:23 AM	Commissary		6209;101121920		(\$7.44)	\$771.56	HDSP
02/13/2017 07:43:25 AM	Commissary		6209;101133696		(\$84.85)	\$686.71	HDSP
02/14/2017 11:01:10 AM	Prison Industries Payroll	7194 - Prison Industries Payroll	02/09/2017	9900007334	\$95.00	\$781.71	HDSP
02/14/2017 11:01:10 AM	Victim of Crime Fund	Victim of Crime Fund	02/09/2017		(\$4.75)	\$776.96	HDSP
02/14/2017 11:01:10 AM	Room and Board	Room and Board	02/09/2017		(\$23.28)	\$753.68	HDSP
02/14/2017 11:01:10 AM	PI Capital Improvement	Capital Improvement	02/09/2017		(\$4.75)	\$748.93	HDSP
02/17/2017 05:04:46 AM	Commissary		6209;101139957		(\$8.62)	\$740.31	HDSP
02/21/2017 12:07:12 PM	Commissary		6209;101145034		(\$43.80)	\$696.51	HDSP
02/24/2017 04:46:55 AM	Commissary		6209;101147075		(\$48.15)	\$648.36	HDSP
02/28/2017 09:04:34 AM	Prison Industries Payroll	7194 - Prison Industries Payroll	02/23/2017	9900007410	\$113.20	\$761.56	HDSP
02/28/2017 09:04:34 AM	Victim of Crime Fund	Victim of Crime Fund	02/23/2017		(\$5.66)	\$755.90	HDSP
02/28/2017 09:04:34 AM	Room and Board	Room and Board	02/23/2017		(\$27.73)	\$728.17	HDSP
02/28/2017 09:04:34 AM	PI Capital Improvement	Capital Improvement	02/23/2017		(\$5.66)	\$722.51	HDSP
02/28/2017						\$722.51	

Trust2

Date	Reference Number	Amount	Balance	Loc Code
02/01/2017			\$0.00	
No Activity				
02/28/2017			\$0.00	

Trust3

Date	Reference Number	Amount	Balance	Loc Code
02/01/2017			\$0.00	
No Activity				
02/28/2017			\$0.00	

Savings

Date	Reference Number	Amount	Balance	Loc Code
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